

**Conference for Food Protection
2012 Issue Form**

**Internal Number: 087
Issue: 2012 II-031**

Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

All information above the line is for conference use only.

Title:

Adoption of ISO/IEC 17024 Standard for Personnel Certification Programs

Issue you would like the Conference to consider:

The Conference should consider adopting ISO/IEC 17024 - Conformity Assessment: General Requirements for Bodies Operating Certification of Persons as a Standard that is equivalent to the Conference for Food Protection Standard for Accreditation of Food Protection Manager Certification Program.

The American National Standard has deemed the two standards to be equivalent. Based on the equivalence of the standards, the Conference should consider accepting Certification Organizations who are accredited to ISO/IEC 17024 by the American National Standards Institute as also meeting the Conference's Standard.

Attached to this issue are three files that should be reviewed in consideration of this issue. The first is the application for accreditation. This file is attached because it contains the language of the ISO/IEC 17024 standard. Because the standard is a copyrighted standard, it is not allowed to be placed in this issue for presentation to the entire conference. However the text of the standard does appear in the application so the conference may review the clauses of the standard by reviewing the application. The second file that is attached is a letter from the American National Standards Institute attesting to the comparability of the two standards. The third file attached is the language from the introduction of ISO/IEC 17024 that describes the purpose of the standard to illustrate that the standard has the same purpose as the Conference's standard (a standard of best practice for certification programs).

Public Health Significance:

The safety of food in the United States is dependent upon Food Managers who understand and implement basic food safety concepts. The Conference has established a standard and an accreditation process against that standard to ensure that Food Manager Certification Programs attesting to the knowledge and skills of Food Managers are valid, reliable and legally defensible. When the Conference standard was developed, no equivalent standard was available for use by the Conference. Since that time, the International Organization for Standardization (ISO) has developed a standard that is not only equivalent, but is of higher quality than the Conference standard. This standard is ISO/IEC 17024 - Conformity Assessment - General Requirements for bodies operating

certification of persons and certification bodies are accredited by the American National Standards Institute (ANSI) against this standard. Certification Organizations seeking accreditation by ANSI against ISO/IEC 17024 must also submit for accreditation by ANSI against the Conference Standard. This results in a duplication of effort. ANSI must send out auditors to audit the same Certification Organization Food Manager program against two similar standards and the Certification Organization must pay twice. This results in an increase cost to the industry. If costs to verify the knowledge of Food Managers increase, the risk to the public is that Food Managers will not seek certification.

Recommended Solution: The Conference recommends...:

adoption of ISO/IEC 17024 "Conformity Assessment: General Requirements for Bodies Operating Certification of Persons" as an equivalent standard to the "Conference for Food Protection Standard for the Accreditation of Food Protection Manager Certification Program" and grant immediate reciprocal accreditation acceptance of a certification organization accredited by the American National Standards Institute (ANSI) against ISO/IEC 17024 as meeting the Conference standard. Thus an organization achieving accreditation by ANSI against ISO/IEC 17024 would also simultaneously receive accreditation against the Conference Standard.

Submitter Information:

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Attachments:

- "ANSI Application for Accreditation (contains 17024 language)"
- "ANSI Letter Stating Equivalence of the ISO Standard to the CFP Standard"
- "Introduction to ISO/IEC 17024 Which describes the Purpose of the Standard"

It is the policy of the Conference for Food Protection to not accept Issues that would endorse a brand name or a commercial proprietary process.



Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

INTRODUCTION TO ANSI PERSONNEL CERTIFICATION ACCREDITATION PROGRAM

Over the past decade, technology has improved the flow of information and provided the world with a tremendous financial market expansion. While this had led to the growth of a more inclusive global economy, the expansion of our world through data exchange has also provided us with challenges. Some of these challenges include the security of information over the Internet, government trade agreements being changed to accommodate the electronic transfer of knowledge, and a world wide industry skill shortage due to lack people trained in this new world of work.

These factors have forced the growth of a rapid transfer of knowledge through education and training. It is important for the consumer to know whether they are receiving a quality knowledge product. To that end, products are regulated and standardized for the protection of the public. Organizations such as ANSI, the International Organization for Standardization (ISO), and the International Electrotechnical Commission (IEC) develop standards, which protect the integrity of a product or service. Organizations apply for and obtain a stamp of approval only after going through a rigorous quality review of not only their product or service, but also their organization as a whole based on globally accepted standards.

Over the past two years, ISO/IEC committees made up of over 22 countries have been developing a standard, ISO/IEC/FDIS 17024, which addresses the general requirements for bodies operating certification schemes for persons. This standard shows how the world can exchange quality programs through the standardization of skills and knowledge, which lead to a certification of a person. ISO/IEC/FDIS 17024 requirements set the standard for all countries' personnel certification programs, through rigorous requirements using quality objectives.

Overview of Draft International Standard of ISO/IEC/FDIS 17024 Standard for bodies operating certification of persons

ISO/IEC/FDIS 17024 specifies requirements which ensure that certification bodies operating certification systems for persons operate the certification of persons in a consistent, comparable, and reliable manner. The standard is broken up into fourteen clauses. Each clause has several sub-components. The clauses are as follows:

Certification body	Organizational structure
Development and maintenance	Management system
Outsourcing	Records
Confidentiality	Personnel requirements
Examiners	Application
Evaluation	Decision on certification
Surveillance and re-certification	Use of certificates and logos

Since its inception in 1918, ANSI has been creating the benchmark of excellence in U.S. voluntary standardization and conformity assessment systems. ANSI is responsible for the integrity of this audit process. Organizations applying for accreditation understand that throughout the process of compliance they will be treated according to ANSI's cornerstone principles of openness, consensus, due process, and balance.

ANSI is the sole United States representative and dues-paying member of the two major non-treaty international standards organizations, ISO and IEC. ANSI possesses the in-depth knowledge of the global standards arena and is in the unique position of creating the first personnel certification accreditation program for U.S. organizations.

By completing this application, you will have begun the first step to compliance with this international standard. In addition you will receive a quality review, tailored for your organization, using your input.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 2 of 34

All application questions must be submitted in writing or via e-mail.

Applications and questions should be directed to:

American National Standards Institute (ANSI)
Attn: Dr. Roy Swift
Senior Director, Personnel Credentialing Accreditation Programs
1899 L Street, NW
11th Floor
Washington, DC 20036
Rswift@ansi.org

All applications will be the sole property of ANSI.

GENERAL INFORMATION FOR SUBMISSION

Process

To facilitate the process of review, please submit one application for each review. One application will be acceptable for a multiple scheme (certification construct/credential) review. Please review each question carefully and when appropriate, respond to questions separately for each individual scheme. Be consistent in your responses, Clause 4.3.2, Item B Scheme 1, Scheme 2 etc. Fill out the application completely. You may attach supporting documentation that further clarifies your answer. Applications must be in 11 or 12-point font size. Submit three copies of the application and supporting documentation.

Application Overview

The application is divided into two sections.

Part 1 is an organizational questionnaire.

Part 2 is a questionnaire based on the ANSI/ISO/IEC 17024 standard. This portion is divided by clauses. Attachments may be added to supplement your answer. Documentation attached may assist in several clause areas. When using an attachment to supplement an answer, note the attachment number on the question. Every attachment must have a cover sheet stating the relevant clause, responding question and where the answer/explanation can be found in the document.

Sample	Attachment A	Policy Manual	
	Clause 4.2.4	Question A	Reference found on Page 3, paragraphs 5-10
	Clause 4.4.3	Question C	Section (b) Reference Page 20, paragraphs 1-3

Multiple Schemes

Again, when submitting the application for a multiple scheme review, you will need to clarify your relative answers as individual schemes. Be consistent in your responses, Scheme 1, Scheme 2 etc.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 3 of 34

Accreditation Assessment

After applications are received, a ten (10) day review period begins. At this time, ANSI will determine whether the material submitted is complete. If necessary, applicants may be asked to provide additional information for clarification. Requested information must be received within ninety (90) days of request. When it is determined that the application is complete, assessors will be assigned to your organization. You will be advised of the assessors' names and given five (5) days to accept or provide information relating to conflict of interest regarding the assessor(s). Assessors will be assigned to your organization from your acceptance of them until the final determination of compliance.

Accepted assessors will review your application and determine an audit plan. The audit plan will be submitted to you for review and comment. Once the plan is agreed upon, an on-site audit will ensue. Your organization will be evaluated using the attached requirements. Please review attachments for all requirements and be ready to supply applicable documentation to the assessors as requested. The length of the audit will depend on the size of the organization and programs being reviewed.

Fees

Application fee	\$3000.00
On-site audit and preparation	\$1250.00 per day, each assessor, plus expenses. Includes: Review of documentation and preparation, on-site audit, oral report at end of audit, written report with commendations, opportunities for improvement, and non-conformity statements.
Corrective actions	<u>All non-conforming items must be corrected before organization is approved for accreditation.</u> Organizations will be given statements describing the rationale for every non-conforming item. You will discuss and determine a timeline with assessors to correct the non-conforming items. Fees associated with reviewing corrective actions are billed at \$1,250 per day or fraction thereafter.

Annexes

- A Application Milestones
- B Documentation that may assist you in completing application
- C Declaration Statement (this must be returned with application)
- D Definitions of terminology common to ISO/IEC/DIS standards



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 4 of 34

APPLICATION FOR ANSI ACCREDITATION

Part 1: Applicant Information

Date:

Certification Body:

Address:

City, State, Zip:

Contact Person:

Title:

E-Mail:

Phone:

Fax:

Web Site:

1. What is the legal structure of your organization?

- Corporate Entity (Not Tax Exempt)
 Corporate Entity (Tax Exempt)
 Part of Parent Organization (includes wholly owned subsidiary)
 Other Please specify:

2. How long has your organization been in existence?

3. How long has your organization been offering personnel certification?

4. How many active certificates are in your database?

- | | | |
|-----------------------------------|--------------------------------------|-----------------------------------------|
| <input type="checkbox"/> 50-100 | <input type="checkbox"/> 1001-3000 | <input type="checkbox"/> 10,001-50,000 |
| <input type="checkbox"/> 101-500 | <input type="checkbox"/> 3001-5000 | <input type="checkbox"/> 50,001-100,000 |
| <input type="checkbox"/> 501-1000 | <input type="checkbox"/> 5001-10,000 | <input type="checkbox"/> 100,001 and up |

5. How many applications are received each year?

- | | | |
|------------------------------------|----------------------------------------|----------------------------------------|
| <input type="checkbox"/> 0-500 | <input type="checkbox"/> 3001-5000 | <input type="checkbox"/> 20,001 and up |
| <input type="checkbox"/> 501-1000 | <input type="checkbox"/> 5001-10,000 | |
| <input type="checkbox"/> 1001-3000 | <input type="checkbox"/> 10,001-20,000 | |

6. How many applicants are tested each year?



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 5 of 34

- 0-500
- 501-1000
- 1001-3000
- 3001-5000
- 5001-10,000
- 10,001-20,000
- 20,001 and up

7. How many tests are administered each year?

- 0-500
- 501-1000
- 1001-3000
- 3001-5000
- 5001-10,000
- 10,001-20,000
- 20,001 and up

8. How many applicants are certified each year?

- 0-500
- 501-1000
- 1001-3000
- 3001-5000
- 5001-10,000
- 10,001-20,000
- 20,001 and up

9. Is your program open to international applicants who are trained/educated outside the United States?

- Yes No

10. If yes, does your organization have any reciprocity agreements in place?

- Yes No

If yes, please explain.

11. Is your certification program necessary for personnel to obtain employment in your industry?

- Yes No

If yes, please explain why.

12. Does your organization outsource components of your personnel certification program?

- Yes No

If yes, what is outsourced?



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 6 of 34

Questions related to certification scheme

13. List the certification schemes within the scope for which you are applying for accreditation.
Name(s)

14. How are your candidates assessed? Check all that apply:

- Written paper and pencil examination
- Oral examination
- Combination of written and oral examinations
- Performance based (directly observed)
- Portfolio (representative sample of work)
- Computer based testing
- Computer adaptive testing
- Other Please specify:

15. Where is your assessment given? Check all that apply.

- Industry setting
- Commercial Testing center
- Educational Institution
- Other Please specify:

16. How often is the examination given, if applicable?

- on demand
 - one time per year
 - two times per year
 - three times per year
 - four times per year
 - greater than four times per year
-



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 7 of 34

Part 2: Compliance with Requirements of ANSI/ISO/IEC 17024

4 Requirements for certification bodies

4.1 Certification body

4.1.1 The policies and procedures of the certification body and their administration shall be related to the criteria in which certification is sought, shall be fair and equitable among all candidates, and shall comply with all applicable regulations and statutory requirements. The certification body shall not use procedures to impede or inhibit access by applicants and candidates, except as provided for in this International Standard.

Clause 4.1.1

Using your policies and procedures, describe how your certification body ensures fair and equitable treatment of candidates throughout all phases of your certification program.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

List laws and regulations applicable to your certification body in the certification process.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.1.2 The certification body shall define policies and procedures for granting, maintaining, renewing, expanding and reducing the scope of the desired certification, and suspending or withdrawing the certification.

Clause 4.1.2

Describe your certification body's policies and procedures for granting, maintaining, and renewing an individual's certificate.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe your certification body's policies and procedures for suspending or withdrawing an individual's certificate.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 8 of 34

Describe and cite the policies and procedures whereby your organization would expand or reduce the scope of its certification scheme(s).

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.1.3 The certification body shall confine its requirements, evaluation and decision on certification to those matters specifically related to the scope of the desired certification.

Clause 4.1.3

Define the scope and parameters of your certification scheme(s). Provide relevant portions of your published documents.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.2 Organizational structure

4.2.1 The certification body shall be structured so as to give confidence to interested parties in its competence, impartiality and integrity. In particular, the certification body:

- a) shall be independent and impartial in relation to its applicants, candidates and certified persons, including their employers and their customers, and shall take all possible steps to assure ethical operations;
- b) shall be responsible for its decisions relating to the granting, maintaining, renewing, expanding and reducing the scope, or suspending and withdrawing the certification;
- c) shall identify the management [group(s) or person(s)] which shall have overall responsibility for
 - 1) evaluation, certification and surveillance as defined in this International Standard, the applicable competence standards and other relevant documents,
 - 2) the formulation of policies relating to the operation of the certification body, with regard to certification of persons
 - 3) decisions on certification,
 - 4) the implementation of its policies and procedures,
 - 5) the finances of the certification body, and
 - 6) the delegation of authority to any committees or individuals to undertake defined activities on its behalf;
- d) shall have documents establishing it as a legal entity or part of a legal entity.

Clause 4.2.1

Describe and provide documentation of how your certification body is independent and impartial.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 9 of 34

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe your ethics policy for staff, consultants, and volunteers.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Provide a description or chart of your organization's structure and the responsibilities of each component.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe how the components of your organization relate to each other and how decisions are made.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Identify your body's management and describe their qualifications.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe the financial controls in place to ensure the independence of the certification body.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Provide documentation establishing your organization as a legal entity or part of a legal entity.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.2.2 The certification body shall have a documented structure which safeguards impartiality, including provisions to assure the impartiality of the operations of the certification body. This structure shall enable the participation of all parties significantly concerned in the development of policies and principles regarding the content and functioning of the certification system, without any particular interest predominating.

Clause 4.2.2



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 10 of 34

Demonstrate how the structure provides for balancing stakeholder interests without any particular interest predominating.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe how changes in the organizational structure are made and approved by the certification body. Cite any policies and procedures used to implement these changes.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.2.3 The certification body shall appoint a scheme committee, which shall be responsible for the development and maintenance of the certification scheme for each type of certification being considered. The scheme committee shall fairly and equitably represent the interests of all parties significantly concerned with the certification scheme, without any particular interest predominating. Where a certification scheme is developed by organizations other than the certification body, the respective developer of the scheme shall adhere to the same principles.

Clause 4.2.3

- a) Describe the structure and functions of your scheme committee and the qualifications of its members. (Refer to definition of scheme committee in ISO/IEC FDIS 17024)

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) Describe the structure and functions of other advisory bodies in relation to the scheme committee.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- c) Describe relationships, functions, and qualifications of any technical support for the scheme committee.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.2.4 The certification body

- a) shall have the financial resources necessary for the operation of a certification system and to cover associated liabilities, b) shall have policies and procedures that distinguish between the certification of persons and any other activities, and c) shall assure that the activities of bodies related to it do not compromise the confidentiality and impartiality of its certification.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 11 of 34

Clause 4.2.4

- a) List and describe the sources of funds used for the operation of your certification system and associated liabilities.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Attach current and the previous three-year audited financial statements. Indicate the level of funding of all activities.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- c) What activities other than certification services does your certification body conduct? Explain how your certification body distinguishes these activities from certification services.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- d) Explain how your policies and procedures maintain confidentiality, objectivity, and impartiality of the certification with respect to your relationships with other bodies.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.2.5 The certification body shall not offer or provide training, or aid others in the preparation of such services, unless it demonstrates how training is independent of the evaluation and certification of persons to ensure that confidentiality and impartiality are not compromised.

Clause 4.2.5

If the certification body provides or aids others in the preparation of training services, demonstrate how training is independent of the evaluation and certification of persons to ensure that confidentiality and impartiality are not compromised.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

Describe the training and how it relates to the certification process.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 12 of 34

4.2.6 The certification body shall define policies and procedures (e.g. code of conduct) for the resolution of appeals and complaints received from applicants, candidates, certified persons and their employers, and other parties about the certification process and criteria, as well as policies and procedures for the performance of certified persons. These policies and procedures shall ensure that appeals and complaints are resolved independently, in an unbiased manner.

Clause 4.2.6

Describe the process for appeals and complaints. Using examples of resolved issues over the past three years, describe how the policies and procedures were applied in an unbiased manner.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

Provide written policies and procedures for appeals and complaints.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- c) Provide policies and procedures that define the performance of certified persons (e.g. codes of conduct/ethics).

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.2.7 The certification body shall employ or contract enough people with the necessary education, training, technical knowledge and experience to perform certification functions relating to the type, range and volume of work performed, under a responsible management.

Clause 4.2.7

- a) Identify any certification functions for which your organization contracts and document how they are monitored. Show the job responsibilities and qualifications of contractors' personnel.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Identify personnel with functions related to the certification. Show their job responsibilities, qualifications, and ways of monitoring performance.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- c) Provide justification that the number of people employed and contracted is adequate.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 13 of 34

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.3 Development and maintenance of a certification scheme

4.3.1 The certification body shall define the methods and mechanisms to be used to evaluate the competence of candidates, and shall establish appropriate policies and procedures for the initial development and continued maintenance of these methods and mechanisms.

Clause 4.3.1

- a) Describe methods and mechanisms used to evaluate candidates.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) Describe the policies and procedures for continually evaluating and updating the methods and mechanisms used to evaluate the competence of candidates.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.3.2 The certification body shall define a process for the development and maintenance of certification schemes that includes the review and validation of the scheme by the scheme committee.

Clause 4.3.2

- a) Describe the development of the certification process for specific scheme(s).

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) How is(are) each scheme(s) reviewed and updated as needed?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.3.3 The certification body shall, where applicable, give due notice to representatives of the scheme committee of any changes in its requirements for certification. The certification body shall take into account the views expressed by the scheme committee before deciding on the precise form and effective date of the changes. Following decision on, and



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 14 of 34

publication of, the changed requirements, the certification body shall, where applicable, inform the interested parties and the certified persons appropriately. The certification body shall verify that each certified person complies with the changed requirements within such a period of time as is reasonable for the certification body in consultation with the scheme committee.

Clause 4.3.3

How does the certification body notify the scheme committee of proposed changes in requirements for certification?
How does the certification body take scheme committee views into account?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

What are the policies and procedures for making a change to a scheme?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

How are stakeholders notified of a change in certification requirements?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

How does the certification body ensure compliance with the change?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.3.4 The criteria against which the competence of a person is evaluated shall be those defined by the certification body in accordance with this International Standard and other relevant documents. If explanation is required as to the application of these documents to a specific certification scheme, it shall be developed by experts, endorsed by the scheme committee, and published by the certification body.

Clause 4.3.4

What documents did your certification body use in developing the criteria against which the competency of a person is evaluated?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

How did experts in your field contribute to the development of the criteria for competence? What are the qualifications of the experts?



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 15 of 34

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.3.5 Certification shall not be restricted on the grounds of undue financial or other limiting conditions, such as membership of an association or group. Successful completion of an approved training course may be a requirement of a certification scheme, but recognition/approval of training courses by the certification body shall not compromise impartiality, or reduce the demands of the evaluation and certification requirements.

Clause 4.3.5

Describe the rationale upon which certification requirements are based and the data supporting the rationale. Justify fees and requirements.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe how any recognition/approval of training programs relates to how certification decisions are made.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.3.6 The certification body shall evaluate the methods for examination of candidates. Examinations shall be fair, valid and reliable. Appropriate methodology and procedures (such as collecting and maintaining statistical data) shall be defined to reaffirm, at least annually, the fairness, validity, reliability and general performance of each examination and all identified deficiencies corrected.

Clause 4.3.6

Describe the procedures to evaluate the examinations. Include content reviews, psychometric analyses, cut score studies and other methodology applied to evaluate the instruments/procedures used to determine certification.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe any validity, reliability, adverse impact or other studies conducted regarding your examination(s).

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Cite the standards that you use to develop the criteria against which you evaluate your examination processes, procedures and instrument(s).



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 16 of 34

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.4 Management system

4.4.1 The certification body shall operate a management system which is documented and covers all the requirements of this International Standard, and ensures the effective application of these requirements.

Clause 4.4.1

Provide documentation of your management system and indicate how it ensures the effective application of the requirements of ISO/IEC/FDIS 17024. (Cite responses to other sections of this application as needed).

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.4.2 The certification body shall ensure that a) a management system is established and maintained in accordance with this International Standard, and b) its management system is understood and implemented at all levels of the organization.

Clause 4.4.2

Describe how your certification body established and how it maintains its management system.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

How does your organization ensure that your management system is understood and implemented on all levels of the organization?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

4.4.3 The certification body shall have document control and internal audit and management review systems in place, including provisions for continual improvement, corrective and preventive actions.

Clause 4.4.3

a) Provide documentation of your document control procedures.

Name of supporting Document:
Attachment numbers(s):



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 17 of 34

Page/paragraph:

- b) Provide documentation of your internal audit and management review systems, including continuous improvement processes and procedures for taking corrective and preventive action.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.5 Subcontracting

4.5.1 When a certification body decides to subcontract work related to certification (e.g. examination) to an external body or person, a properly documented agreement covering the arrangement, including confidentiality and prevention of a conflict of interest, shall be drawn up. The decision on certification shall not be subcontracted.

Clause 4.5.1

- a) Show documentation of the agreement and a detailed description of all certification-related work that is contracted to individuals and/or organizations.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Attach samples of your confidentiality and conflict of interest statements and agreements.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- c) Provide documentation that the organization does not contract for decisions on certification.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.5.2 The certification body

- a) shall take full responsibility for such subcontracted work and maintain its responsibility for granting, maintaining, renewing, expanding and reducing the scope, and suspending or withdrawing certification;
- b) shall ensure that the subcontractor is competent and complies with the applicable provisions of this International Standard and is not involved, either directly or through their employer, with training or the maintenance of the certification of persons in such a way that confidentiality and impartiality could be compromised, and
- c) shall maintain a list of its subcontractors, and assess and monitor their performance in accordance with documented procedures.

Clause 4.5.2



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 18 of 34

- a) Describe how your certification body monitors work for which it contracts. Include processes and procedures that ensure that corrective actions are taken when needed.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Describe how your certification body determines that its contractor(s) is(are) competent to perform their work for the organization.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- c) Describe how your certification body ensures that its contractor(s) are not involved with the training or maintenance of the certification in such a way that confidentiality and impartiality could be compromised.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- d) Describe your organization assesses and monitors the work of its contractor(s).

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.6 Records

4.6.1 The certification body shall maintain a record system appropriate to its particular circumstances and to comply with regulations, including a means to confirm the status of a certified person. The records shall demonstrate that the certification process has been effectively fulfilled, particularly with respect to application forms, evaluation reports, surveillance activities and other documents relating to granting, maintaining, renewing, expanding and reducing the scope, and suspending or withdrawing certification.

Clause 4.6.1

- a) Describe in detail your certification record system and demonstrate how it meets the requirement of the standard.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.6.2 The records shall be identified, managed and disposed of in such a way as to ensure the integrity of the process and the confidentiality of the information. The records shall be kept for an appropriate period of time to demonstrate continued confidence for at least one full certification cycle, or as required by recognition arrangements, contractual, legal or other obligations.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 19 of 34

Clause 4.6.2

- a) Describe how your organization's certification records are managed and show how these procedures meet the requirements of the standard.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Give the rationale for how long your certification records are maintained.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.7 Confidentiality

The certification body shall, through legally enforceable commitments, keep confidential all information obtained in the process of its activities. These commitments shall cover all individuals working within the body, including committee members, and external bodies or individuals acting on its behalf. Such information shall not be disclosed to an unauthorized party without the written consent of the organization or individual from whom the information was obtained, except where the law requires such information to be disclosed. When the certification body is required by law to release such information, the organization or individual concerned shall be informed beforehand of what information will be provided.

- a) Provide your confidentiality policies and documentation of your procedures for maintaining confidentiality of all information obtained through certification activities. (Refer to responses given in other sections of this application as needed.)

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) If applicable, provide evidence of a denial for a request for information.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

4.8 Security

All examinations and related items shall be maintained in a secure environment by the certification body, or its subcontractors, to protect the confidentiality of these items throughout their useful life.

- a) Describe in detail the policies and procedures by which you and your contractor(s) protect the security and confidentiality of examinations and related items.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 20 of 34

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

5 Requirements for certification body personnel

5.1.1 The certification process shall define the competence requirements for employed or contracted persons involved in the certification process.

Clause 5.1.1

- a) List the personnel, including contract personnel directly involved in the certification process. Identify their qualifications for performing their assigned tasks.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) Describe and cite the process for approving the required qualifications of personnel or contractor positions/individuals.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

5.1.2 The certification body shall require its employed or contracted persons to sign a document by which they commit themselves to comply with the rules defined by the certification body, including those relating to confidentiality and those relating to independence from commercial and other interests, and from any prior and/or present link with the persons to be examined that would compromise impartiality.

Clause 5.1.2

- a) Attach samples of confidentiality forms/agreements/declaration statements used by personnel and volunteers that declare they are committed to the certification bodies' rules. (Refer to other responses to this application as appropriate.)

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) Describe and cite the policies and procedures associated with these forms.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 21 of 34

5.1.3 Clearly documented instructions shall be available to the employed or contracted persons describing their duties and responsibilities. These instructions shall be kept up to date. All personnel involved in any aspect of certification activities shall possess appropriate education, experience and technical expertise which satisfies defined competence criteria for the tasks identified. They shall be trained for their specific responsibilities and made aware of the significance of the certification offered.

Clause 5.1.3

- a) Provide descriptions of personnel (employed or contracted) duties and responsibilities. List and describe all training and orientation programs and the personnel who have attended.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

5.1.4 The certification body shall establish and maintain current documentation on the relevant qualification, training and experience of each individual. The information shall be accessible to the individual(s) concerned and shall include the following:

- a) name and address;
- b) organization affiliation and position held;
- c) education and professional status;
- d) experience and training in the relevant;
- e) their specific responsibilities and obligations within the certification body;
- f) performance appraisals;
- g) date of most recent updating of records.

Clause 5.1.4

- a) How, where, and by whom are personnel records maintained?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) What type of information is placed in personnel files? Provide an example of any standard forms utilized for all personnel.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

5.2 Requirements for examiners

5.2.1 Examiners shall meet the requirements of the certification body based upon applicable competence standards and other relevant documents. The selection process shall ensure that examiners assigned to an examination or part of an examination at least

- a) are familiar with the relevant certification scheme,
- b) have a thorough knowledge of the relevant examination methods and examination documents,



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 22 of 34

- c) have appropriate competence in the field to be examined,
- d) are fluent both in writing and orally in the language of examination, and
- e) are free from any interest so that they can make impartial and non-discriminatory judgments (assessments).

Clause 5.2.1

- a) Describe and cite the selection criteria, qualifications, and responsibilities of examiners. (This would include scorers for performance/product assessment.)

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) How are examiners selected and trained, and how is their performance monitored, evaluated, and adjusted as needed?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

5.2.2 If an examiner has a potential conflict of interest in the examination of a candidate, the certification body shall undertake measures to ensure that confidentiality and impartiality of the examination is not compromised (see 4.2.5). These measures shall be recorded.

Clause 5.2.2

If a trainer/instructor is(was) used in the evaluation process, present the the rationale and justification for this practice.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

Provide evidence that objectivity and impartiality is(was) maintained under these circumstances.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6 Certification process

6.1.1 The certification body shall provide on request a current detailed description of the certification process, appropriate to each certification scheme (including fees), and the documents containing the requirements for certification, the applicants' rights, and the duties of a certified person which includes a code of conduct, if applicable (see 6.6.2).

Clause 6.1.1

- a) Provide a sample of the descriptive documentation that is given to candidates.

Name of supporting Document:



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 23 of 34

Attachment numbers(s):

Page/paragraph:

6.1.2 The certification body shall require the completion of an application, signed by the applicant seeking certification, which includes

- a) the scope of the desired certification,
- b) a statement that the person agrees to comply with the requirements for certification and to supply any information needed for the evaluation,
- c) details of relevant qualifications, confirmed and supported by evidence, and
- d) general information on the applicant, for example name, address and other information required to identify the person.

Clause 6.1.2

- a) Describe the application process. Attach a sample application.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Provide a rationale for information requested on the application.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- c) If an electronic signature is accepted, how is the signature verified?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- d) What policies and procedures are in place to verify application information?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.2 Evaluation

6.2.1 The certification body shall review the application to confirm that

- a) the certification body has the capability to deliver the requested certification,
- b) the certification body is aware of and can, within reason, accommodate any special needs of applicants, such as language and/or disabilities, and
- c) the applicant has the required education, experience and training specified by the scheme.

Clause 6.2.1



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 24 of 34

- a) Identify what documents are required from candidates, how applications are reviewed, and how documentation submitted and statements made by applicants are verified.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Provide documentation of your policy and procedures for determining and providing accommodations for candidates who indicate that they have special needs.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- c) How does the certification body address language issues indicated by applicants? (This includes exams given in foreign languages as well as disability-related language issues.)

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- d) What are the qualifications of the individuals who review applications? How is the performance of their functions monitored, evaluated, and corrected if needed?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.2.2 The certification body shall examine competence, based on the requirements of the scheme, by written, oral, practical, observational or other means.

Clause 6.2.2

- a) Describe how relevant knowledge, skills, and abilities are examined in the certification process.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Describe studies performed to ensure that all appropriate competence criteria are objectively and systematically evaluated?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.2.3 Examinations shall be planned and structured in a manner which ensures that all scheme requirements are objectively and systematically verified, with sufficient documented evidence produced to confirm the competence of the candidate.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 25 of 34

Clause 6.2.3

- a) What method(s) is(are) used to evaluate specific knowledge, skills, and abilities?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) For each scheme, provide a rationale for specific assessment mechanism(s) used.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.2.4 The certification body shall adopt reporting procedures that ensure the performance and results of the evaluation are documented in an appropriate and comprehensible manner, including the performance and results of examinations.

Clause 6.2.4

Describe how examination results are recorded.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

Describe how examination results are reported and maintained.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

Describe any regulations or requirements for reporting results outside your organization, how you comply with them, and how you maintain confidentiality of individual results in accordance with your policies.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.3 Decision on certification

6.3.1 The decision on certification of a candidate shall be made solely by the certification body on the basis of the information gathered during the certification process. Those who make the certification decision shall not have participated in the examination or training of the candidate.

Clause 6.3.1



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 26 of 34

- a) Describe the process by which certification decisions are reached.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) What body makes the decision on certification?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- c) Describe the policies and procedures in place to prevent an error regarding the decision of certification of a candidate.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

6.3.2 The certification body shall provide a certificate to all certified persons. The certification body shall maintain sole ownership of the certificates. The certificate may take the form of a letter, card or other medium, signed or authorized by a responsible officer of the certification body.

Clause 6.3.2 (See Clause 6.3.3 for requirements)

Provide a model of the certificate, letter, card, or other medium issued to all successful candidates notifying them of their certification.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

Describe how your certification body protects the integrity of its certification from unauthorized use.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

6.3.3 These certificates shall contain, as a minimum, the following information:

- a) the name of the certified person and a unique certification number;
- b) the name of the certification body;
- c) a reference to the competence standard or other relevant documents, including issue, on which the certification is based;
- d) the scope of the certification, including validity conditions and limitations;
- e) the effective date of certification and date of expiry.

Clause 6.3.3 (See 6.3.2)



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 27 of 34

6.4 Surveillance and recertification procedure

6.4.1 The certification body shall define a pro-active surveillance process to monitor certificants' compliance with relevant provisions of the certification scheme.

Clause 6.4.1

- a) Describe the surveillance methods used to monitor certificate holders.

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) How is it determined that certificate holders are compliant with current certification requirements?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

6.4.2 The certification body shall have procedures and conditions for the maintenance of certification in accordance with the certification scheme. These conditions, including the frequency and content of surveillance activities, shall be endorsed by the scheme committee. The conditions shall be adequate to ensure that there is impartial evaluation to confirm the continuing competence of the certified person.

Clause 6.4.2

- a) How often does the committee charged with surveillance review their procedures?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

- b) What surveillance techniques are used to ensure impartiality in the evaluation of certified persons?

Name of supporting Document:
Attachment numbers(s):
Page/paragraph:

6.5 Recertification

6.5.1 The certification body shall define recertification requirements according to the competence standard and other relevant documents, to ensure that the certified person continues to comply with the current certification requirements.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 28 of 34

6.5.2 The certification body shall have procedures and conditions for the maintenance of certification in accordance with the certification scheme. These conditions, including the frequency and content of recertification activities, shall be endorsed by the scheme committee. The conditions shall be adequate to ensure that there is impartial evaluation to confirm the continuing competence of the certified person.

Clauses 6.5.1 and 6.5.2

- a) Describe recertification requirements.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) Describe the recertification program and how it is implemented. Include documentation of how there is impartial evaluation to confirm the continuing competence of the certificant.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.6 Use of certificates and logos/marks

6.6.1 A certification body that provides a certification mark or logo shall document the conditions for use and shall appropriately manage the rights for usage and representation.

Clause 6.6.1

- a) Describe the use of the certification mark. Attach the certification mark and describe its use.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

- b) How is the certification mark protected from misuse?

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.6.2 The certification body shall require that a certified person sign an agreement

- to comply with the relevant provisions of the certification scheme,
- to make claims regarding certification only with respect to the scope for which certification has been granted,
- not to use the certification in such a manner as to bring the certification body into disrepute, and not to make any statement regarding the certification which the certification body may consider misleading or unauthorized,
- to discontinue the use of all claims to certification that contains any reference to the certification body or certification upon suspension or withdrawal of certification, and to return any certificates issued by the certification body, and
- not to use the certificate in a misleading manner.



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 29 of 34

Clause 6.6.2

- a) Provide a copy of the agreement that includes all of the elements in clause 6.5.2.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:

6.6.3 Inappropriate references to the certification or misleading use of certificates and marks or logos in publications, catalogues, etc. shall be addressed with corrective measures, such as the suspension or withdrawal of certification, publication of the infraction and, if appropriate, additional legal action.

Clause 6.6.3

Describe how any inappropriate references to certification and its corresponding marks have been addressed.

Name of supporting Document:

Attachment numbers(s):

Page/paragraph:



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Date Issued: 2009-05-01 **PUBLIC FORM PCAC-FR-504**
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Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Annex A: Personnel Certification Accreditation — Application Milestones

Application	Date
<input type="checkbox"/> Received application materials	_____
<input type="checkbox"/> Reviewed materials, if necessary send questions to ANSI	_____
<input type="checkbox"/> Sent in application and fee	_____
<input type="checkbox"/> Received acknowledgement from ANSI	_____
<i>Ten-day review period begins.</i>	
<input type="checkbox"/> Received assessor names	_____
<input type="checkbox"/> Sent back response card accepting/declining assessor(s)	_____
<i>Once assessors are approved by organization, they will conduct a paper review of application.</i>	
<input type="checkbox"/> Quality evaluations complete	_____
<input type="checkbox"/> Information requested, (90) days to resubmit without further fees	_____
<input type="checkbox"/> 90 day deadline	_____
<input type="checkbox"/> Audit plan determined by assessors, sent to organization for approval and discussion.	_____
<input type="checkbox"/> Audit plan accepted.	_____
On-site Audit	
<input type="checkbox"/> Assessors arrive	_____
<input type="checkbox"/> Audit conducted	_____
<input type="checkbox"/> Oral and summary report received	_____
<input type="checkbox"/> Written report received	_____
Non-conforming item(s)	
<input type="checkbox"/> Plan drawn up with assessors for correction	_____
<input type="checkbox"/> Corrective actions approved	_____
<input type="checkbox"/> All non-conformities corrective actions approved	_____
<input type="checkbox"/> Corrective actions taken and sent in for review	_____
<input type="checkbox"/> Acknowledgment received	_____
<input type="checkbox"/> Non-conformities accepted as corrected	_____



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Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 31 of 34

OR

Further corrective action required

Accreditation awarded



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 32 of 34

Annex B: List of possible documents to assist you in filling out application materials

1. Accommodations Policy & Procedures
2. Annual Report
3. Audits
4. Board Minutes
5. Bylaws
6. Candidate Handbook
7. Certification Handbook
8. Committee Minutes
9. Confidentiality Agreements
10. Contracts
11. Disclaimer Statement
12. Ethics Policy
13. Financial Statements and Audits
14. Insurance
15. Job Descriptions
16. Job/practice Analysis
17. Management Manual
18. Mission Statement
19. Personnel



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 33 of 34

Attachment C: Declaration Statement

Applicant agrees to meet the following conditions:

1. Applicant shall provide ANSI with all information requested for the process of assessing competency of a personnel certification body;
2. Applicant agrees to pay all fees charged for assessment of competence; including all subsequent fees once competence is recognized;
3. Applicant is familiar with the requirements for assessment of competency for personnel certification bodies;
4. The certification body can demonstrate it:
 - Is an independent third-party as a certifier of services provided to individuals;
 - Is a legal entity or part of a legal entity; and
 - Has a clearly defined scope of certification.

ANSI requires each applicant to adhere to the following:

- a) make all necessary arrangements for the conduct of assessments, including provisions for examining documentation, and access to records (including internal assessment reports) and personnel for the purpose of surveillance, re-assessment and resolution of complaints;
- b) make claims only regarding activities defined in the scope of the accreditation granted;
- c) not use the accreditation in such a manner as to bring the Personnel Certification Accreditation Program into disrepute and not make any statement regarding the accreditation which Personnel Certification Accreditation Program may consider misleading or unauthorized;
- d) upon withdrawal of the Personnel Certification Accreditation Program accreditation, discontinue use of all advertising material which references the Personnel Certification Accreditation Program accreditation and return all accreditation documents including the certificate to ANSI;
- e) not allow the Personnel Certification Accreditation Program accreditation to imply that a person's competencies are approved by the Personnel Certification Accreditation Program;
- f) ensure that no Personnel Certification Accreditation Program document, logo, or report nor any part thereof is used in a misleading manner; and
- g) comply with Personnel Certification Accreditation Program requirements when referencing the status of Personnel Certification Accreditation Program accreditation in communication media such as documents, brochures, or advertising.

I accept the conditions aforementioned and attach said completed application for accreditation review by the American National Standards Institute.

Please sign below.

Name

Approving Authority Title

Date



Date Issued: 2009-05-01

PUBLIC FORM PCAC-FR-504

Approved by: Lane Hallenbeck (2009-05-01)

Revision: 2

Application for ANSI Accreditation Under ANSI/ISO/IEC 17024

Page 34 of 34

Attachment D: Terms and Definitions

Certification Scheme: Certification scheme (body of knowledge) relating to a specific certification of an occupation, specialty, role, or skill.

Certification System: Management system for carrying out certification process.

Examiner: An individual who actually evaluates a candidate or the candidate's performance or product (not a proctor.)

Internal Audit: An evaluation conducted by an individual within the organization.

Surveillance: Surveillance is a process by which certificants are monitored to determine whether the certification body should initiate any action to suspend or revoke the certification.

Acronyms

ANSI American National Standards Institute

ISO International Organization for Standardization

IEC International Electrotechnical Commission

ANSI/ISO/IEC 17024:2003, General requirements for bodies operating certification of persons. This international standard specifies requirements which ensure that certification bodies operating certification schemes for persons operate in a consistent, comparable, and reliable manner.¹

PCAC Personnel Certification Accreditation Committee

¹ ANSI/ISO/IEC 17024, page v



January 24, 2012

To Whom It May Concern:

I have been requested by Dr. Cynthia Woodley to make a statement about the comparability of the Conference for Food Protection: Standards for Accreditation of Food Protection Manager Certification Programs and ANSI/ISO/IEC 17024 Conformity Assessment – General requirements for bodies operating certification of persons.

As the purveyor of accreditation service for both standards, our professional staff believe the Standards are similar and ANSI/ISO/IEC 17024 is equal or higher than the CFP Standards for Accreditation of Food Protection Manager Certification Program.

Lane Hallenbeck
Vice President
Accreditation Services

Introduction

ISO/IEC 17024 has been drawn up with the objective of achieving and promoting a globally accepted benchmark for organizations operating certification of persons. Certification of persons is one means of providing assurance that the certified person meets the requirements of the certification scheme. Confidence in the respective certification schemes is achieved by means of a globally accepted process of assessment, subsequent surveillance and periodic re-assessments of the competence of certified persons.

However, it is necessary to distinguish between situations where certification schemes for persons are justified and situations where other forms of qualification are more appropriate. The development of new certification schemes for persons, in response to the ever increasing velocity of technological innovation and growing specialization of personnel, may compensate for variations in education and training and thus facilitate the global job market. Alternatives to certification may still be necessary in positions where public services, official or governmental operations are concerned.

In contrast to other types of conformity assessment bodies, such as management system certification/ registration bodies, one of the characteristic functions of the personnel certification body is to conduct an examination, which uses objective criteria for competence and scoring. While it is recognized that such an examination, if well planned and structured by the certification body, can substantially serve to ensure impartiality of operations and reduce the risk of a conflict of interest, alternative requirements have been included in ISO/IEC 17024.

In either case, ISO/IEC should be the basis for the recognition of the certification bodies and their certification schemes, in order to facilitate their acceptance at the national and international levels. Only the harmonization of the system for developing and maintaining certification schemes for persons can establish the environment for mutual recognition and the global exchange of personnel.

ISO/IEC 17024 specifies requirements which ensure that certification bodies operating certification schemes for persons operate in a consistent, comparable and reliable manner. The requirements in this International Standard are to be considered as general requirements for bodies operating certification schemes for persons and therefore may have to be supplemented in response to additional demonstrated market need/desire (i.e. improvement of the profession) or specific government requirements (i.e. protection of the public).