

National Association of Architectural Metal Manufacturers Accredited NAAMM ANSI Operating Procedures

December 21, 2016

1. GENERAL

These *Operating Procedures* describe the National Association of Architectural Metal Manufacturer's (NAAMM) procedures for developing and maintaining American National Standards ("Standards"). Where these *Operating Procedures* are silent on an issue, the *ANSI Essential Requirements: Due process requirements for American National Standards* shall serve as the precedent document.

2. ORGANIZATION

NAAMM's organizational structure currently includes six NAAMM Operating Divisions. Members of each Division are manufacturers of specific products used primarily in commercial and industrial construction applications. NAAMM is the legal entity, the designated ASD and Secretariat for ANSI activities and provides staffing and coordinates the operations of each Operating Division.

2.1. Committees

2.1.1. Each Division Panel (DP), established by a NAAMM Operating Division, shall be responsible for developing and maintaining Standards that fall within the scope of these procedures. The membership of the Division Panels shall consist of representatives of member companies of the NAAMM Operating Division, but may be supplemented with representatives of another Division to assist with the project. When necessary, Division Panels may form subgroups (subcommittees, working groups, and ad hoc committees) to work on the project and report back to the Division Panel.

Each NAAMM Operating Division shall be responsible for initiating ANSI standards projects by formal motion at a duly constituted meeting and shall be responsible for approving the standard submission to the Consensus Committee for the project. Each NAAMM/ANSI standard shall be considered for review annually. Consideration shall be given to the length of time that a revision or new standard development takes in order that standards development and/or review can be initiated in a timely manner.

2.1.2. For each standards project, a properly constituted and balanced Consensus Committee shall be established in accordance with paragraph 2.3 of the *ANSI Essential Requirements*.

2.2 Secretariat – NAAMM shall be the Secretariat for all ANSI standards projects operating in accordance with these procedures. The Secretariat shall:

- a. Organize the Consensus Committees and maintain their rosters.
- b. Oversee compliance with these procedures, including legal review as necessary.
- c. Maintain rosters of all Division Panels, subcommittees, and task force groups.
- d. Maintain all records pertaining to the panels and committees.
- e. Provide administrative support, including secretarial services for the panels and committees.
- f. Publish approved standards and revisions thereto.

- g. Perform other functions as required.
- h. Review the Internal Guidelines for Implementation of NAAMM/ANSI Procedures for ANSI Standards periodically with NAAMM staff

2.3. NAAMM Operating Divisions –Each NAAMM Operating Division manages and coordinates its specific standards projects and oversees the work of the Division Panel. This group performs the final review and approval of standards, materials, and/or reports prior to their being put before the Consensus Committee and, when finalized, submitted to ANSI.

2.4 Records – Material associated with the development and revision of a standard, including drafts, ballots, and appeals, shall be retained in accordance with the NAAMM records retention policy.

2.5 Consensus Committees

2.5.1 Definition - Consensus committees are standing committees that provide an evaluation of standards following their initiation or revision by Division Panels. Consensus Committees do not meet, but independently review and vote on proposed standards.

2.5.2 Membership - Membership on Consensus Committees shall be open to any person materially or directly affected by the standardization activity in question. Participation shall not be conditional upon membership in any organization nor unreasonably restricted on the basis of technical qualifications or other such requirements. NAAMM membership is not a prerequisite to participation. Unless it is claimed by a directly and materially affected person that a single interest category dominated a consensus committee, no test for dominance is required. NAAMM, however, strives to assure that no single interest category constitutes a majority of the membership of a consensus committee. The Secretariat shall consider and may recommend reasonable limits on the size of Consensus Committees.

A solicitation for Consensus Committee members shall be made on the NAAMM website, ANSI Standards Action and in appropriate trade publications (if publications appropriate for the relevant division are available). This solicitation shall be made at the start of the consensus committee review cycle for the standard being initiated or revised, but need not be done more than once a year.

Individuals wishing to present their candidacy for service on the consensus body shall present an application for membership to the Secretariat as directed. This application will be available on the NAAMM website. A definition of interest categories to accompany the application shall be posted on the website and be available on request. Candidates must convey their direct and material interest in the Consensus Committee's work and must indicate their affiliation and interest category. The applicant must also indicate his/her qualifications and willingness to participate. Applications will be reviewed by the Division Technical Committee or their designated representatives from the committee prior to the approval of an appointment to the consensus committee.

Consensus Committees are formed for the standards of one Division and shall serve for a term of up to one year. After that time, or prior to the initiation or revision of a Division standard, their interest shall be reconfirmed by the process for their participation outlined above.

2.6 Interest Categories – All members of NAAMM Consensus Committees shall be classified in one of three categories of participants, Producers, Users or General Interest in accordance with the following definitions:

2.6.1 Producers: An individual or entity that manufactures architectural metal products. This category typically includes representatives from hollow metal door, metal bar grating, expanded metal, miscellaneous and ornamental metal products companies, products represented by the NAAMM Operating Divisions.

2.6.2 Users: Both individuals and representatives of organized groups that purchase, use, or specify architectural metal products. This category includes, but is not limited to, consulting engineers, architects, specifiers, government agencies, owners, and contractors in accordance with *ANSI Essential Requirements*, Section 2.3.

2.6.3 General Interest: General Interest members are neither Producers nor Users. This category includes, but is not limited to, inspectors, technical societies, regulatory agencies (state and federal), researchers, and educators. However, if the members of such organizations and/or associations are Producers and/or Users, the organization and/or association shall be classified in accordance with the classification of its members.

An individual in professional practice or a consultant, retained under an indefinitely continuing agreement with an organization, shall be classified in accordance with the classification of the organization retaining the individual and shall be so identified. There shall be a limit of one voting member from each entity, company, or organization.

2.7 Membership Roster – The Secretariat shall prepare and maintain a membership roster documenting the classification of each Consensus Committee member.

2.8 Termination of Membership – The Secretariat shall be authorized to terminate the membership of an individual of a Consensus Committee for cause, including inactivity (unless a waiver by the committee is approved). A Consensus Committee member shall be considered inactive for failure to return at least 75 percent of the letter ballots issued during a calendar year. Committee members shall notify the Secretariat of any changes in employment affecting representation and shall submit a new application if continued membership on the committee is desired.

3. NOTIFICATION OF STANDARDS DEVELOPMENT

Notification of standards activity shall be announced on the NAAMM web site and in suitable media as appropriate to demonstrate provision of opportunity for participation by all directly and materially affected persons. At the initiation of a project to develop or revise a Standard, notification shall be transmitted to ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for listing in Standards Action. This PINS form will be submitted within 30 days or as soon as possible thereafter, of the Division motion to initiate or revise a standard. Comments resulting from publication of PINS will be handled in accordance with Section 2.5 of the ANSI Essential Requirements.

4. CHANGE

4.1 Substantive Change

A substantive change in a Standard is one that directly and materially affects the use of the Standard. Examples of substantive changes are below:

- a. “shall” to “should” or “should” to “shall”;
- b. the addition, deletion or revision of requirements, regardless of the number of changes; and/or
- c. the addition of mandatory compliance with referenced standards.

4.2 Editorial Change

An editorial change is one that is non-substantive and corrects errors or inconsistencies in a manuscript.

5. VOTING PROCEDURES

5.1 Letter Ballots – New Standards, reaffirmation and revision of Standards, and the withdrawal of Standards shall be approved by letter ballot of the Consensus Committee. Substantive changes to and interpretations of all Standards shall be approved by letter ballot of the Consensus Committee.

Editorial changes to Standards may be decided by a majority of the members present at a scheduled meeting of a Division Panel.

5.2 Voting – Each member shall vote one of the following positions on letter ballots:

- a. Affirmative.
- b. Affirmative with comment.
- c. Negative, with reasons.
- d. Abstain.

5.3 Voting Period – The closure date for electronic ballots shall be 30 days from the date of the distribution of the ballots. The Secretariat shall be authorized to grant an extension of the voting period if deemed necessary.

5.4 Approved Actions – All electronic ballots shall be considered approved when all of the following conditions have been met:

- a. Approval by at least a majority of the Consensus Committee.
- b. At least two-thirds of the votes cast, excluding abstentions and negatives without reasons, are affirmative.
- c. All negative votes with reasons have been addressed in accordance with 6.7.

5.5 Reporting Votes – The results of each vote on all Standards shall be reported as follows:

- a. Number of members.
- b. Number of members voting affirmatively.
- c. Number of members voting negatively with reasons.

- d. Number of members voting negatively without reasons.
- e. Number of members abstaining.
- f. Number of members not returning ballots.

5.6 Negative Votes – A negative ballot shall be required to be accompanied by a reason and, if possible, shall include specific actions that will resolve the objection.

In accordance with the *ANSI Essential Requirements, paragraph 2.7.3*, a negative ballot not supported by a reason is not required to be re-circulated but shall be recorded as a negative without comment on the BSR-9 form. The ballot shall be counted as returned for the purpose of establishing a quorum.

A negative ballot with a reason that the Division Panel determines is not directly related to the document will be recorded as a negative without comment on the BSR-9 form as submitted to ANSI. Comments received with a negative vote that is not relevant to the standard under consideration shall be documented and kept as a proposal for future new work on the standard under consideration.

5.7 Consideration of Negative Votes – The Division Panel or Secretariat will endeavor to resolve all negative comments. The Division Panel or Secretariat shall use the following procedures in attempting to resolve negative votes:

- a. All negative ballots and comments will be forwarded to the Division Panel responsible for the proposed Standard for response. The Division Panel chairman (with other Division Panel members, as necessary) will draft the response on behalf of the Division Panel. Negative ballots may be judged as valid or nongermane. All objectors will receive a written disposition with reasons therefore.. Unresolved objections along with attempts at resolution will be provided to the Consensus Committee in order to afford them the opportunity to respond, reaffirm or change their vote.
- b. All substantive changes shall be submitted to ANSI via the BSR-8 for further public review and re-circulated to the Consensus Committee for re-balloting in order to afford the Consensus Committee members the opportunity to respond, reaffirm or change their vote.
- c. Voting members or public review participants who have unresolved negative votes (comments) shall *be notified in writing (by letter or in electronic format) of their right to appeal and of the appeals process.*
- d. Negative votes which are not accompanied by reasons shall be recorded as “negative without reasons” and no further action shall be required.
- e. Previously-considered negative votes. If the reasons for a negative vote have been previously considered by the Division Panel or Secretariat, the voter whose reasons have been previously considered by the Division Panel shall be provided the full previous decision. It shall not be necessary to reconsider the vote unless new information has been submitted. If no new information is submitted, the previous decision of the ~~DP~~ shall stand, and the negative voter shall be so advised.

Previously proposed Section 5.8 has been deleted.

6. PUBLIC REVIEW AND COMMENT

Proposals for new Standards or reaffirmation, revision, or withdrawal of existing Standards shall be transmitted to ANSI for listing in *Standards Action* for comment. When possible, public review will be initiated concurrently with the onset of the Consensus Committee balloting process. Follow-up e-mails shall be sent requesting immediate return of the ballot to all members whose votes have not been received ten calendar days before the ballot closes.

All public and Consensus Committee comments that are received shall be considered concurrently by the Division Panel, and the commenter shall be notified, in writing, of the Division Panel's decision/response and the reasons therefore.

7. APPEALS

7.1 Complaint – Persons who have been or may be affected by any Division Panel action or inaction shall have the right to appeal such action or inaction. The appellant shall file a written complaint with the Secretariat within 30 days after the date of notification of any action or at any time with respect to inaction. The complaint shall state the nature of the objection, the procedures or the sections of the Standards that are at issue, the action or inaction at issue, and the specific remedial action(s) that would satisfy the appellant's concerns. Previous efforts to resolve the objections and the outcome of each shall be noted. Appeals are allowed for procedural matters only. Technical appeals are not permitted.

7.2 Response – Within 30 days after the receipt of the complaint, the Secretariat shall respond in writing to the appellant, specifically addressing each allegation in the complaint to the extent possible. The Secretariat shall attempt to resolve, informally, the complaint of the appellant.

7.3 Appeals Panel and Hearing – If the Secretariat is unable to informally resolve the complaint, it shall be sent to the appropriate Division Panel for resolution. The Division Panel will hold a hearing on a date agreeable to all participants, with at least 15 working days notice. The hearing may be held with the participants in person, by teleconference, or in another agreed upon method.

7.4 Conduct of the Hearing – The appellant has the responsibility of demonstrating improper action or inaction, the adverse effects there from, and the efficacy of the requested remedial action. The Secretariat has the responsibility to demonstrate that the Division Panel took all actions in question in compliance with these procedures.

7.5 Decision – The Division Panel shall render its decision in writing within 30 days of the hearing, based upon a preponderance of the evidence, stating its findings of fact and conclusions, with reasons therefore and citing the evidence. The Secretariat shall notify the appellant of the decision of the Division Panel, which shall be binding and final on all concerned.

8. INTERPRETATIONS

8.1 Request -Any request for interpretation or clarification, whether written or oral, must be answered in writing that the standard speaks for itself.

8.2 Response - Where an interpretation requires a substantive response, the request for interpretation must be addressed to NAAMM in writing. The Secretariat will forward the request through the appropriate NAAMM Operating Division to its Division Panel for consideration. Within 30 days of receipt, a response to the interpretation shall be forwarded to the requester.

8.3 Records - All correspondence related to the request for interpretation will be retained in the project file for the standard and be available for review if and when that standard is audited.

9. CONSIDERATION OF INTERNATIONAL STANDARDS

Division Panels shall take international standards into consideration, if available and appropriate, when developing or revising ANSI standards under their purview.

10. NAAMM RECORD RETENTION POLICY FOR ANSI STANDARDS

All documents, including but not limited to ANSI forms (PINS, BSR8, BSR9), pre-project interest letters and responses, Consensus Committee correspondence and ballots, resolution of negatives, Consensus Committee rosters, and all pertinent correspondence and records concerning new, revised, or reaffirmed American National Standards, shall be retained for one complete standards cycle, or until the standard is revised, approved, and published. Records concerning withdrawn standards shall be retained for at least five years from the date of withdrawal.

11. METRIC POLICY

NAAMM will incorporate soft metric conversions in all of its manuals, guide specifications, and standards, including American National Standards, as they are revised. When any of the industries represented in NAAMM require hard metric values for their use, it is anticipated that the appropriate NAAMM publications will be revised accordingly or new documents issued.

12. PATENT POLICY

NAAMM has adopted the Patent Policy as outlined in the *ANSI Essential Requirements* for ANS development.

13. COMMERCIAL TERMS AND CONDITIONS POLICY

NAAMM has adopted the Commercial Terms and Conditions Policy as outlined in the *ANSI Essential Requirements* for ANS development.

14. DISCONTINUANCE OF A STANDARDS PROJECT

NAAMM may choose to abandon the processing of a proposed new or revised American National Standard or portion thereof. In such cases, the appropriate NAAMM Operating Division will do so by motion at a duly constituted meeting. A copy of the motion will be sent to ANSI along with a notification for publication in ANSI Standards Action.

15. REVISIONS TO PROCEDURES

Proposed revisions to these *NAAMM ANSI Operating Procedures for ANSI Standards* should be written and submitted to ANSI along with rationale supporting the requested change. In addition, the Secretariat shall review the *ANSI Essential Requirements* when they are published each year and will cause these *Operating Procedures* to be updated to keep them consistent with ANSI policy and procedures. The updated documents will be posted on the NAAMM web site and reviewed with NAAMM Operating Divisions and the NAAMM staff.

16. ANTITRUST POLICY

NAAMM has adopted the Antitrust Policy as outlined in the *ANSI Essential Requirements for ANS* development.