

March 19, 2021

**Comments from the ANSI National Accreditation Board (ANAB) on Rule 61G20-6.002-
Commission Approval and Accreditation of Advanced Building Code Training Courses**

Thomas Campbell
Executive Director
Florida Building Commission

Dear Mr. Campbell,

The ANSI National Accreditation Board (ANAB) welcomes the opportunity to provide its input to support the Florida Building Commission in its rule development for rule 61G20-6.002 Commission Approval and Accreditation of Advanced Building Code Training Courses.

ANAB comments are focused on the rule 61G20-6.002 that it designates “persons” as accreditors and not an independent accreditation bodies.

ANAB recommends that the rule 61G20-6.002 include requirements for accreditation of training programs by an independent accreditation body. More specifically the training provider and their programs should be required to be accredited under an American National Standard, ANSI/ASTM E2659-18, Standard Practice for Certificate Programs to assure that certificate holders have undergone rigorous training and evaluation of learning outcomes. This program is discussed in more detail below.

It is important for all stakeholders to know that the accreditation activities are performed by a competent body that is impartial and independent. For that reason, there is an increasing demand for impartial attestation of their competence. Accreditation bodies normally operate in a non-profit distributing manner and conduct regular assessments of certificate issuer to ensure compliance with relevant national/international standards and regulations. Such a system to accredit is intended to provide for a consistent application of standards in order to benefit public health, safety, environment and welfare and support regulators and end users. For this reason, an individual serving as an accreditor does not provide sufficient safeguards to support decision making in a fair, independent, and impartial manner.

The industry accepted best practice, ISO/IEC 17011, general requirements for accreditation bodies accrediting conformity assessment bodies, requires the separation between the individuals who would assess program(s) and make recognition:

ISO/IEC 17011: 2017- 7.7.2 The accreditation body shall ensure that each decision on granting, maintaining, extending, reducing, suspending and withdrawing accreditation is taken by competent person(s) or committee(s) different from those who carried out the assessment.

ANAB has a qualified pool of assessors who conduct the assessments. The recognition decisions are made by ANAB's Certificate Accreditation Program Accreditation Committee (CAPAC). An individual who serves as an assessor cannot be a member of the CAPAC. Likewise, a member of the CAPAC cannot be an assessor. ANAB follows an established process to determine the required assessor competencies based on applicable standards and requirements. All assessors are required to undergo initial and ongoing training to maintain competence requirements. ANAB has an established procedure to monitor the performance of all qualified assessors on an ongoing basis. The metrics for assessor performance monitoring includes (a) evaluation of reports (b) client feedback (c) field evaluations (d) participation in annual training (e) competencies required under ISO/IEC 17011 and IAD MD 20.

Additionally, ANAB's accreditation under ANSI/ASTM E2659-18 provides an added layer of legal defensibility against invalid claims for "Advanced Building Code Training Courses". ANAB accreditation will assure the training content is based on industry-accepted best practices and approved and monitored by an expert oversight group; the scoring of the learner assessment is based on a passing standard established through a criterion-referenced method. Therefore, validity of content and validity and reliability of the training assessment, more generally, the training program will be defensible in a court of law, because ANAB accreditation itself would serve as proof of the scientific evidence that is acceptable in the court of law.

Furthermore, Florida Building Commission recognized only accredited certification bodies under Florida Statute 553.842 Product Evaluation and Approval, clauses (3), (5)(a)3., and (5)(b)1, which are all accredited by ANAB under ISO/IEC 17065 along with ISO/IEC 17020 standard. Therefore, recognizing an accreditation process under ANSI/ASTM E2659-18 standard would align with the Florida Statute 553.842 and Florida Building Commission's practice.

About ANSI National Accreditation Board (ANAB)

ANAB is an ANSI affiliate organization. The ANAB accreditation process – itself based on an international standard (ISO/IEC 17011) – is extremely rigorous and ensures that only those organizations that meet the stringent requirements under the standard are accredited. An independent third-party accreditation is an "accountability mechanism" to ensure the quality and legitimacy of organizations offering credentials. ANAB accreditation provides an added layer of legal defensibility against invalid claims. The accountability and transparency built into the ANAB process support conformity assessment attestations, and can result in reduced liability insurance. ANAB offers Certificate Accreditation Program (CAP) under ANSI/ASTM E2659-18, Standard Practice for Certificate Programs.

About American National Standards Institute (ANSI)

ANSI is a federation whose members are government agencies, trade associations, standards developing organizations, professional societies, companies, academic and international bodies, and consumer organizations. ANSI represents the interests of more than 270,000 companies and 30 million professionals. As the voice of the U.S. standards and conformity assessment system, ANSI empowers its members and constituents to strengthen the U.S. marketplace position in the global economy while helping to assure the safety and health of consumers and the protection of the environment.

The Institute promotes the use of U.S. standards internationally, advocates U.S. policy and technical positions in international and regional standards organizations, and encourages the adoption of international standards as national standards where they meet the needs of the user community. ANSI

is the sole U.S. representative and dues-paying member of the two major non-treaty international standards organizations, the International Organization for Standardization (ISO), and, via the U.S. National Committee (USNC), the International Electrotechnical Commission (IEC). As a founding member of ISO, ANSI plays a strong leadership role in its governing body while U.S. participation, via the USNC, is equally strong in the IEC.

Voluntary consensus standards for products, processes, and services are at the foundation of the U.S. economy and society. The United States has a proud tradition of developing and using voluntary standards to support the needs of our citizens and the competitiveness of U.S. industry in world markets.

ANSI oversees the creation, promulgation, and use of thousands of norms and guidelines that directly impact businesses in nearly every sector: from acoustical devices to construction equipment, from dairy and livestock production to energy distribution, and many more. Through its affiliate, the ANSI National Accreditation Board (ANAB), the Institute is also actively engaged in accreditation – assessing the competence of organizations determining conformance to standards.

Benefits of Reliance on ANSI/ASTM E2659-18, Standard Practice for Certificate Programs

This standard was developed in response to growing concerns relating to the quality of training programs. The standard provides a framework to provide competency based high quality training and educational programs. It requires that a certificate program meet predefined industry requirements for content, employs a criterion referenced examination, and includes a mechanism for constant feedback for quality improvement. The main provisions of the ASTM 2659 standard include the following requirements.

- **Validated Content:** Content of the training program must be based on industry accepted practices. An oversight group consists with subject matter experts ensure that the content is aligned with what employers are seeking.
- **Learning Process:** The instructional delivery must include appropriate instructional design, and must be flexible to the needs of the individual learner.
- **Learning outcomes assessment:** Assessment is the process of measuring an individual's competencies to perform a required job. The standard requires a criterion referenced examination to measure intended learning outcomes.
- **Continuous improvement process:** The standard requires the training provider to institutionalize an ongoing systematic process to ensure that the training curriculum is updated and remains market relevant as skill-set changes. Quality improvement processes should be embedded throughout the training program.

To ensure that the credentials they promote meet industry and quality standards, many federal and state agencies rely on these ANAB accreditation for certificate programs. Some of these examples include:

- Department of Education (DoE) has selected ANSI National Accreditation Board (ANAB) to join its higher education initiative, entitled Educational Quality through Innovative Partnerships (EQUIP).
- Department of Defense (DOD) Recognitions: DoD Instruction 1322.29 Job Training, Employment Skills Training, Apprenticeships and Internships that requires ANAB's Certificate Accreditation Program.
- Accredited and DoD Organizations:
U.S. Army Combat Readiness/Safety Center
Department of the Army Career Program 32 (CP-32)
Department of the Army, Civilian Logistics Career Management Office (CLCMO)
- Department of Labor (DOL) Recognition: ANSI National Accreditation Board (ANAB) has been approved by the U.S. Department of Labor's Office of Apprenticeship as a Standards Recognition Entity (SRE).
- States requiring ANAB-CAP accreditation for Food Safety Training: California, Illinois (additionally for Food Allergen Training programs), Texas, Arizona, New Mexico, West Virginia, Hawaii, Georgia

Conclusion

ANAB commends Florida Building Commission for its commitment to improving regulations, including its commitment to regulations that are straightforward, clear, and designed to minimize burdens. Ongoing reviews of regulations to ensure that they continue to meet the needs for which they originally were designed. ANAB welcomes Florida Building Commission's initiative to improve professional practice and public safety by instituting a robust process to assess the quality and competence of training providers. With ANAB comments, rule 61G20-6.002 should make a significant contribution to assuring professional practice and safety for all.

Sincerely,

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