

THE APPROVAL PROCESS IN STEP-BY-STEP DETAIL FOR WORKING GROUP CHAIRS

Now that the draft has been completed and approved by the working group, here are the anticipated next steps to complete the approval process:

A preliminary review of the draft should be conducted by the managing subcommittee but may be skipped if the subcommittee chair does not feel that there is any benefit to the review. Flexibility exists in how subcommittee reviews and comment resolutions are handled to maximize benefit while completing the review process efficiently. If held, a review period of 45 days is typically set, possibly more for a new standard of significant size. Subcommittee reviews are issued by ANS staff through ANS Collaborate. ANS staff will format the draft and add the subcommittee roster to the foreword prior to issuing the subcommittee ballot. In parallel to the subcommittee ballot, the draft may be reviewed by other ANS non-developing consensus committees (NDCCs) with overlapping scopes, the Risk-informed, Performance-based Principles and Policy Committee (RP3C), and the Subcommittee on Risk Application (SCoRA). At this time, the working group chair is asked to complete the Disclosure of Copyrighted Material in ANS Standards form to

- 1) identify excerpts/material from other sources (i.e., material not from the previous version of the standard or created by the working group for the standard) and
- 2) identify any definitions new to ANS standards (those not in the ANS glossary available in the toolkit at <https://www.ans.org/standards/toolkit/>).

As soon as the subcommittee (NDCC, RP3C, and SCoRA if applicable) review closes, comments will be posted by ANS staff to the working group's site on ANS Collaborate and a notification will be issued. The working group is asked to consider all comments and provide a response to each. When the comment is accepted, the response can simply be "accepted." When the comment is not accepted, a brief explanation is required. In addition to preparing comment responses, the draft should be revised to incorporate accepted comments if appropriate. Revisions to the draft should be made in track mode so that the commenter can easily review the draft to confirm acceptance. More detailed instructions will be provided at the time the comments are uploaded to the group's site.

Completed comment responses and the revised draft should be returned to ANS staff for posting, distribution, and tracking. When all comments have been satisfactorily addressed or attempts at compromise have been exhausted, ANS staff will check with the subcommittee chair for direction on issuing the draft to the consensus committee. ANS staff will include the subcommittee and working group chairs on distribution to keep them informed throughout this process.

With subcommittee chair approval, the draft is prepared for the formal consensus committee ballot. ANS staff will accept any track changes from the subcommittee review and add or update the consensus committee roster in the foreword at this time.

The consensus committee ballot is issued by ANS staff in ANS Collaborate. The ballot shall be issued for 30 days but may be longer at the discretion of the consensus committee chair if necessary. An extended ballot period is likely for new or large standards. The consensus committee ballot is issued in parallel with a public review through the American National Standards Institute (ANSI).

As soon as the consensus committee ballot closes, comments from consensus committee members will be posted by ANS staff to the working group's site and working group members will be notified. A copy of the draft as submitted to the consensus committee will also be posted. The working group is asked to

provide a response to each comment within 60 days. (*Occasionally less time is needed when there are not significant comments*). When the comment is accepted, the response can simply be “accepted.” When the comment is not accepted, a brief explanation is required. In addition to preparing comment responses, the draft should be revised to incorporate accepted comments as appropriate. A good faith attempt should be made to address all comments and resolve all negatives. Revisions to the draft must be made in track mode so that commenters can easily review the draft to confirm that their comments were accepted as well as for the review of the consensus committee chair. It is extremely important that the working group uses the draft as issued to the consensus committee as a starting point for any changes. Full instructions will be provided when the comments are posted to your group’s site.

Completed comment responses and the revised draft should be provided to ANS staff for posting, distribution, and tracking. Consensus committee members that submit a negative vote are requested to review the resolution and consider upgrading their vote to approved or approved with comments (if they have additional comments). Negative voters are given 30 days to decide if the response is satisfactory and let us know. We cannot upgrade their vote without their consent for any reason.

If public comments are received, responses must be prepared for each comment. The working group chair should provide ANS staff the comment responses (and the revised draft – if not already provided) for distribution to the public commenter(s). Public commenters will be informed that they must let us know within two weeks if they are not satisfied or we will consider the resolution satisfactory.

While unanimous approval is not required, it should always be the goal. If any commenters are not satisfied, additional attempts at resolution should be made. It can be helpful for the working group chair to personally speak to the commenter to find a compromise. Additional comment responses or resolutions reached via discussion must be documented and provided to ANS staff. ANS staff will follow up with the commenter to confirm and document satisfaction. Please keep your subcommittee chair and vice chair, as well as ANS staff, informed of any challenges throughout this process.

ANSI requires that all substantive changes made to the draft after the consensus committee ballot be approved by the consensus committee and serve an additional public review (NA for subcommittee reviews). The ANSI definition of substantive change is copied below:

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

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

It is the consensus committee chair’s responsibility, with assistance from the subcommittee and working group chairs if needed, to review the draft to determine if any substantive changes have been made to the draft since the previous consensus committee ballot. If substantive changes are found, another ballot, called a recirculation ballot, and second public review will be needed. It is our practice to identify substantive changes in the revised draft when issued for recirculation ballot. Committee members and the public are requested to focus comments on substantive changes. This practice has greatly reduced the review time of commenters and the amount of comments that the working group must address/resolve. Should there be a considerable amount of substantive changes or extended time resolving comments (>12 months), the draft will need to be issued for a second, full ballot.

If any negative votes are maintained from committee members or any objections filed by a member of the public, a recirculation ballot (occasionally called a reconsideration ballot) must be conducted. A recirculation ballot announces the objection to the consensus committee and provides full details (comments and responses). Members are directed to consider the objection and determine if they are in

agreement with the objector. Should they side with the objector, they are permitted to change their approved vote to negative, or if they were a nonresponse on the previous ballot, they may submit a vote.

When possible, recirculation ballots for substantive changes and for maintained objections are combined. Some draft standards require more than one recirculation ballot.

The results from the recirculation ballot are reviewed by the consensus committee chair. If the approval is 66.7% or over, consensus is declared provided that the vote response reflects a reasonable balance of interest. Any objectors, if applicable, must be notified of the ballot results in writing and given an opportunity to appeal a decision to move forward. If the approval is less than 66.7% but more than a simple majority, the consensus committee chair may declare consensus if deemed justified. Alternately, the working group may be given specific direction to resolve the issue based on the recirculation ballot results and member comments.

Once all ballots have been completed, the consensus committee chair reviews the ballot results (possibly the draft) and submits a release to ANS staff confirming that there are no substantive changes and approval meets with the criteria for declaring consensus. ANS staff then issues a ballot to the Standards Board seeking their certification that approval has been reached in compliance with our rules, policies, and procedures. Materials on the ballot process, voting record, balance of interest of the consensus committee, objections, appeals, etc., are provided. The Standards Board does not perform a review of the draft. The review period for this ballot is 15 days.

With Standards Board certification achieved, documents are submitted to ANSI for approval of the standard as an American National Standard. Essentially, the same paperwork submitted to the Standards Board is submitted to ANSI. Like the Standards Board, ANSI does not perform a review of the draft. When there are no negatives, ANSI approval is usually granted in one or two weeks. When submitting requests for approvals involving negatives and appeals, the approval can take much longer.

As soon as we have been granted ANSI approval, the manuscript for the approved standard is edited for punctuation, grammar, format, and consistency. During this time, the working group chair is called upon to respond to editor queries. The standard is not published until the working group chair is satisfied with the standard and gives their permission. The publication may take two to four months depending on the workload of the ANS editor and the length of the standard.

Once the standard is published, the working group is sent a complimentary hard copy. A MS Word doc of the formatted standard is maintained at ANS headquarters for use on the next revision.