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July 15, 2019

**TO: IAS-APPLICANT/ACCREDITED FIELD EVALUATION BODIES AND OTHER INTERESTED PARTIES**

**SUBJECT:** Information presented to the committee regarding issues arising in the Electrical Field Evaluations, covered under the IAS Field Evaluation Body (FEB) accreditation program, Subject AC354-0919-0919-R1 (DS/RN)

**Hearing Information:**

IAS Accreditation Committee  
Monday, September 16, 2019  
8:00 a.m.

**Fullerton Marriott at California State University**

2701 Nutwood Avenue  
Fullerton, CA 92831  
(714) 738-7800

Dear Madam or Sir:

This purpose of this memo is to inform the Accreditation Committee regarding certain issues identified during the electrical field evaluations, covered under the IAS Field Evaluation Body (FEB) accreditation program.

IAS is not proposing any changes to the current IAS Accreditation Criteria for Field Evaluation of Unlisted Electrical Equipment, AC354, dated April 2017.

**Introduction**

This criterium relies on the following documents:

- NFPA 790, Standard for Competency of Third-Party Field Evaluation Bodies (2018)
- NFPA 791, Recommended Practice and Procedures for Unlabeled Electrical Equipment Evaluation (2018)
- ISO/IEC Standard 17020, Conformity assessment – Requirements for the operation of various types of bodies performing inspection (2012)
- IAS Rules of Procedure for Field Evaluation Body Accreditation

Note 1: AC354 Cl. 4.3: “Recommended practices and procedures in NFPA 791 are mandatory requirements for the purposes of the IAS accreditation.”

Note 2: Requirements stipulated by NFPA standards for this program are only for the United States.

### Requirements

The following requirements in NFPA 790 and 791 require field labeling at the final installation site, including knowledge of the requirements of the AHJ.

#### NFPA 790

- 10.2 Evaluation Locations.
- 10.2.1 The field evaluation process shall be completed at the final installation site.
- 10.2.2 A preliminary evaluation for the field evaluation, if conducted, shall be permitted to be conducted at the point of manufacturing, at interim points of distribution, in the evaluating company’s facilities, or at the final installation site.

#### NFPA 791

- 4.4 Jurisdictional Notification. The FEB should notify the electrical AHJ in writing when an evaluation is initiated and about to commence.
- 7.2 Discrepancies and Nonconformities
- 7.2.3 Discrepancies and nonconformities brought to the client’s attention, per Section 7.2, should be brought to the AHJ’s attention.
- 7.2.4 A copy of the report, per Section 7.1, should also be provided to the AHJ.
- 7.3 Engineering Report Documentation. The title page should include the following items:
  - (section 3) The identity and location of the site where the evaluated equipment is or will be installed
  - (section 4) The identity and location of the AHJ where the evaluated equipment is or will be installed

### Issues/Concerns

- (1) Field labeling equipment before the final installation site, and not knowing the AHJ and without identifying/informing the AHJ.

Our past assessments of IAS FEB clients and their responses to findings indicated many of our clients often applied FE labels before the final installation site and without identifying/informing the AHJ and did not always know the AHJ. On April 6, 2018, IAS wrote to our clients asking them to indicate situations and reasons why this would happen. Those reasons include:

- Installation site is highly secured area such as government facility
- Customer needs FE for own reasons, not due to AHJ request
- Equipment is not disassembled to ship
- Equipment is cord connected or internally powered

Note: In Canada CSA Standard SPE-1000 covers Field Evaluations (also called Special Inspections in Canada). SPE-1000 allows equipment to be evaluated and labeled in any location, as long as there is not significant disassembly of electrical systems. SPE-1000 has a limit on production of 500 pieces per year.

It is important to note that Field Evaluated equipment is intended to be distinguishable from Listing of equipment. Our client survey and assessment data indicate that non-USA based FEBs are using the FE program more for cord connected products through distributors, to differing degrees.

A common practice among some of our FEB clients is to field label cord connected equipment at a distributor at times for both U.S. and Canada, without knowing the final installation site nor the AHJ. Equipment labeled this way has generally been installed and accepted with or often without AHJ involvement.

Many FEBs put disclaimers in their reports that the AHJ has final approval and may not accept equipment labeled before the final site.

(2) Customer and market reasons for completing field evaluations before the final site.

Procurement contracts for limited production quantities of equipment are requiring equipment to be field labeled prior to delivery to distributors, primarily catering to industries such as pharmacy, medical, laboratory, education and food service.

Field evaluations are no longer occurring for the typical reason that non-listed/labeled equipment is being red tagged by AHJs involved during 'permit' applications.

For existing buildings requiring new custom or limited production equipment permits are not required as AHJs are not involved.

(3) NFPA EEE Committee Action

Client feedback indicates these issues had been discussed by the NFPA EEE Committee in the past, and no changes to the standards in the past 3 editions, 2012, 2014 and 2018, have occurred regarding the above-mentioned issues.

Requests by one of our FEB clients, through the public comment phase, to change wording in the standards related to these issues, in both 2016 and 2018 were rejected by the NFPA EEE committee. Some reasons given included:

- 2016 - "This requirement is one item that differentiates a field evaluation from a full certification (listing). If the evaluation and labeling is to occur at the point of manufacturing, that project is to follow a certification process with full investigation, testing, including any required destructive testing, and listing as defined in the applicable standards for testing and certification bodies. It is also statutorily required that field evaluations be completed at the final installation site by a number of jurisdictions across the United States."

- 2018 - "The proposed requirement would change the basis of evaluation in this standard and the submitter failed to provide adequate technical substantiation."

Another request has been made by an FEB recently through public comment to allow equipment to be labeled prior to the installation site if cord connected or assembled per instructions at another site.

(4) Limited Production Certification

Many FEBs also offer a Limited Production Certification service. This service is similar to the FE program, except a different type of certification mark is applied and usually full conformance to standards with full testing is required on one unit, and the manufacturing facility must be ISO 9001 registered, already having surveillance audits, or requiring a one-time audit.

### IAS PLANS

To date IAS has gathered information on industry practice and asked FEB clients to document their FE process. We have encouraged FEBs to discuss and submit comments to the NFPA committee and have followed this process.

IAS is considering adding wording to client FEB certificates that the IAS FEB Accreditation only applies for equipment that is labeled at the final installation site. This would be in addition to the current wording "Approval is subject to Authorities Having Jurisdiction (AHJ)".

IAS is also considering covering Limited Production Certification programs under the Accreditation Program for Product Certification Agencies (PCA), AC370.

You are cordially invited to submit written comments, or to attend the committee hearing and present verbal comments. Written comments will be forwarded to the committee, **prior to the hearing**, if received by **August 28, 2019**. Please use the comment form link found on the Accreditation Committee meeting page on the IAS website, [www.iasonline.org](http://www.iasonline.org). Comments may be postal mailed to the address above or emailed to [iasinfo@iasonline.org](mailto:iasinfo@iasonline.org).

Any written material submitted for committee consideration will be available for public distribution as set forth in Section 4.0 of the Rules of Procedure for Accreditation Committee Meetings (copy enclosed).

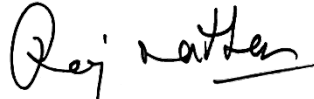
Visual aids (including, but not limited to, charts, slides, videos, or presentation software) for viewing at meetings will be permitted only if the presenter provides to IAS, before the presentation, a copy of the visual aid(s) in a medium that can be retained by IAS with its record of the meeting, and that can also be provided to interested parties.

Your cooperation is requested in forwarding to the **Brea** office, as noted above, all material directed to the committee. Prior to the hearing, parties interested in the

deliberations of the committee should refrain from communicating, whether in writing or verbally, with committee members regarding agenda items. The committee reserves the right to refuse communications that do not comply with this request.

If you have any questions, please contact Doug Sickles, accreditation officer, at 562-364-8201, extension 3309, or the undersigned at 562-364-8201. You may also reach us by e-mail at [iasinfo@iasonline.org](mailto:iasinfo@iasonline.org).

Yours very truly,

A handwritten signature in black ink that reads "Raj Nathan". The signature is written in a cursive style with a horizontal line underlining the name.

Raj Nathan  
President

RN/nl

Enclosure

cc: Accreditation Committee



## RULES OF PROCEDURE FOR ACCREDITATION COMMITTEE MEETINGS

### 1 1.0 PURPOSE

2 The purpose of the Accreditation Committee and its meetings is to safeguard IAS' impartiality to monitor the work of and  
3 to approve accreditation criteria for International Accreditation Service, Inc. (IAS).

4 The committee meetings, which are open public hearings, provide an opportunity for effective involvement by all  
5 interested parties.

### 6 2.0 MEETINGS

7 2.1 The Accreditation Committee shall schedule meetings that are open to the public in discharging its duties under  
8 Section 1, subject to Section 5.0 of these rules.

9 2.2 To properly discharge its responsibilities with respect to monitoring of IAS accreditation activities, the committee shall  
10 have a standing item on its meeting agenda for a presentation by staff on the status of its accredited programs and information  
11 on any pending appeals.

12 2.3 All scheduled meetings shall be publicly announced.

13 2.4 A majority of the voting Accreditation Committee members shall constitute a quorum. A majority vote of members  
14 present is required on any action.

15 2.5 If a specific interest group is not represented, votes by the committee on subjects related to that interest group will be  
16 held in abeyance. IAS staff shall make pertinent information available to absentee committee members, and ballot the  
17 members at a later stage. Records of such ballots shall be made available upon request.

18 2.6 In the absence of the nonvoting Chair-Moderator, Accreditation Committee members present shall elect an alternate  
19 Chairman from the committee for that meeting. The alternate Chairman shall be counted as a voting committee member for  
20 purposes of maintaining a committee quorum and to cast a tie-breaking vote of the committee.

21 2.7 Minutes of the meetings shall be kept.

### 22 3.0 MEMBER COMPETENCE CRITERIA

23 Members of the Accreditation Committee shall be familiar with conformity assessment and the implementation of  
24 regulatory requirements within their industry sector. They shall possess:

- 25 • A Baccalaureate degree from an accredited institution or a minimum of ten years equivalent experience as determined by  
26 IAS;
- 27 • Current employment within the conformity assessment, regulatory field, academia, industry, or IAS accredited CAB; and
- 28 • Demonstrated expertise in one or more accreditation programs offered by IAS.

29 **4.0 MEETING RECORDS**

30 Official meeting records shall be kept by IAS; no other audio, video, electronic or stenographic recordings of the meetings  
31 will be permitted. Visual aids (including, but not limited to, charts, slides, videos, or presentation software) viewed at meetings  
32 shall be permitted only if the presenter provides IAS before presentation with a copy of the visual aid in a medium which can  
33 be retained by IAS with its record of the meeting and which can also be provided to interested parties requesting a copy. A  
34 copy of the IAS minutes of the meeting and such visual aids, if any, will be available to interested parties upon written request  
35 made to IAS together with a payment as required by IAS to cover costs of preparation and duplication of the copy. These  
36 materials will be available shortly after the conclusion of the meeting but will no longer be available after 60 days have elapsed  
37 from the conclusion of the meeting.

38 **5.0 WRITTEN COMMUNICATIONS AND SUBMISSIONS**

39 Parties interested in the deliberations of the committee should refrain from communicating, whether in writing or verbally,  
40 with committee members regarding agenda items. All written communications and submissions regarding agenda items  
41 should be delivered to IAS. All such written communications and submissions shall be considered nonconfidential and  
42 available for discussion in open session of an Accreditation Committee meeting, and shall be delivered *at least twenty days*  
43 before the scheduled Accreditation Committee meeting if they are to be forwarded to the Committee. Correspondence  
44 received by IAS will not be released to any party, except to the Accreditation Committee, prior to the meeting without  
45 permission of the author. The committee reserves the right to refuse recognition of communications which do not comply with  
46 the provisions of this section. All such communications and submissions will be available from IAS upon written request and  
47 payment of costs associated with duplication. The materials will be available shortly after the conclusion of the meeting but will  
48 no longer be available after 60 days have elapsed from the conclusion of the meeting.

49 **6.0 CLOSED SESSIONS**

50 Meetings shall be open except that the chairman may call for a closed session to seek advice of counsel.

51 **7.0 ACCREDITATION CRITERIA**

52 Criteria are established by the committee to provide a basis for International Accreditation Service, Inc., accreditations.  
53 Consideration of accreditation criteria must be in conjunction with a current and valid application for an IAS accreditation listing  
54 or as otherwise determined by the Accreditation Committee.

55 **7.1 Procedure**

56 **7.1.1 New Criteria**

57 **7.1.1.1** Proposed accreditation criteria may be submitted by interested parties to IAS, and/or shall be developed by the  
58 IAS staff and discussed in open session with the Accreditation Committee during a scheduled meeting

59 **7.1.1.2** Proposed accreditation criteria shall be available to interested parties approximately 60 days before discussion  
60 at the committee meeting, unless determined by IAS management that extraordinary consideration and electronic balloting are  
61 needed.

62 **7.1.1.3** The committee shall be informed of all pertinent written communications received by IAS. Parties interested in  
63 proposed new criteria may deliver communications and submissions regarding such proposed criteria to IAS within 40 days of  
64 the posting of the public notice on the IAS website. Such communications and submissions will otherwise be subject to the  
65 provisions of Section 4.0 of these rules.

66 **7.1.1.4** Attendees at Accreditation Committee meetings shall have the opportunity to speak on accreditation criteria  
67 listed on the meeting agenda, to provide information to committee members.

68 **7.1.2 Existing Criteria**

69 **7.1.2.1** Changes to existing accreditation criteria may be submitted by interested parties to IAS, and/or shall be  
70 changed by the IAS staff. Existing accreditation criteria may be revised by the committee either (i) at a public meeting pursuant  
71 to the procedures set forth herein, or (ii) by electronic ballot, provided public notice is provided as stipulated I Section 7.1.1.2.

72 **7.1.2.2** The committee shall be informed of all pertinent written communications received by IAS. Parties interested in  
73 the proposed revisions to accreditation criteria may deliver communications and submissions regarding such proposed  
74 revisions to IAS within the following timelines:

75

Type	Dates
Public Meeting	40 Days after posting of proposed criteria
Electronic Balloting Process	30 Days after posting of proposed criteria

76

77 Such communications and submissions will otherwise be subject to the provisions of Section 4.0 of these rules.

78 **7.1.3 ELECTRONIC BALLOTING**

79 **7.1.3.1** IAS management shall provide written rationale and seek permission and documented approval from the IAS  
80 Accreditation Committee chair to propose new criteria or to revise existing criteria for extraordinary consideration and  
81 electronic balloting by the committee.

82 **7.1.3.2** Proposed accreditation criteria shall be available to interested parties approximately 30 days before  
83 consideration by the committee. All pertinent written communications received by IAS relating to the proposed criteria shall be  
84 received no later than 30 days after the posting of the criteria. Ballots, along with comments received and staff  
85 recommendations, will be submitted to the committee for consideration. The committee shall return their ballots with their  
86 recommendations within 10 days from the date ballots are sent. The results of the balloting will be compiled and forwarded to  
87 the chair of the committee for validation and decision.

88 **7.1.3.3** The electronically balloted criteria shall be brought back to the next regularly scheduled accreditation  
89 committee hearing as per Section 7.1.2 of these rules,

90 **7.1.4 Effective Date of Published Criteria**

91 **7.1.4.1** The effective date of approved accreditation criteria or approved revisions to existing accreditation criteria shall  
92 be no earlier than 30 days following the public meeting.

93 **7.1.4.2** Approved criteria using electronic balloting shall be effective the date of posting of the criteria on the IAS  
94 website.

95 **7.2 Approval**

96 Approval of accreditation criteria shall be as specified in Section 2.4 of these rules.

97



98 **8.0 ACCREDITATION COMMITTEE MEMBERS**

99 **8.1** The IAS Accreditation Committee members are appointed or reappointed annually by the IAS Board of Directors in  
100 consultation with the IAS President.

101  
102 **8.2** Committee members are selected from senior management positions within accredited organizations, users of  
103 accreditation, industry groups and governmental or regulatory organizations. The individuals appointed to the committee shall  
104 have knowledge of regulatory codes within their industry sector and international conformity assessment process and  
105 practices. ■