

ANSI National Accreditation Board (ANAB) offers the following comments.

In reviewing the CMMC Program we believe it is important to understand where our comments are coming from.

The international third-party accredited conformity assessment industry has a multi-level structure in place to manage impartiality, independence, and competence. This structure allows for recognition around the world; not only formally but by reputation.

It is imperative that the CMMC program includes a similar structure and rigor in order to produce the intended results for the DOD CMMC program. It is important to design a program to have the necessary competence, independence, integrity and rigor from the start, in order to not dilute the outcomes nor the program's reputation.

While ANAB offers further comment, below, we would welcome the opportunity to work with the DoD and/or the CMMC AB to assist in developing such a program as we describe above and below.

Structure - Scheme Owner and Accreditation Body Roles:

The international third-party accredited conformity assessment industry (referred to as accreditation industry), that ANAB is a part of, is made up of various programs; based on international standards, national standards and/or scheme specific standards.

Only through the third-party accreditation process can programs truly achieve a global approach; even when based on national or scheme specific requirements.

The accreditation industry has various levels of rigor that together make up the competence, credibility, and integrity necessary to achieve the intended results for the marketplace.

The industry starts with the International Accreditation Forum (IAF) and International Laboratory Accreditation Cooperation (ILAC) which are the two international cooperations responsible for oversight of the **accrediting bodies** or accreditation bodies (ABs). IAF and ILAC oversight the accreditation activity through multilateral recognition arrangements (MLAs). Depending on the scope of operations, the accreditation body could be a signatory to one or both MLAs. ANAB is a signatory to both IAF and ILAC MLAs including multiple programs.

Accreditation bodies (e.g. ANAB) that are signatories to IAF and/or ILAC MLAs are subject to initial and ongoing stringent evaluation of their operations to ISO/IEC 17011 and applicable to the AB's scope of operations IAF or ILAC requirements.

Accreditation bodies offer accreditation to multiple standards. Accreditation is the independent evaluation of an organization against recognized standards to ensure their impartiality and competence. The accreditation process relies on a structure with a uniform approach to determine specific competence of an organization – an approach that has been accepted, recognized, and implemented around the world. An approach that has resulted in valuable recognition and recognized integrity.

Many programs within the third-party accredited conformity assessment industry are oversighted (and owned) by either government entities or industry groups.

Industries and regulatory authorities or otherwise known as **scheme owners**, are increasingly relying on internationally recognized independent assessments to support their enforcement and monitoring activities as they demonstrate compliance with legislation, conformance with requirements, and performance against industry benchmarks and key indicators.

Requirements for acceptability of an accreditation body to deliver programs vary among scheme owners. One approach is recognition of any accreditation body solely on its signatory status to the IAF or ILAC MLAs. Another, more common approach used by many scheme owners is using the IAF or ILAC MLA signatory status as a base for recognition with additional requirements established by the program or scheme owner, such as additional unique competence, additional oversight, etc. Additionally, many scheme owners will also place on-going oversight over the accreditation body; whereby the scheme owners will monitor the accreditation body's activities to verify conformance and performance.

Scheme owner oversight of accreditation bodies could be all or a combination of the below at a frequency that's decided by the scheme owner.

- Require application and re-application for recognition or approval
- On-site evaluation of the Accreditation Body by a Scheme Owner
- Scheme owner's participation in assessments
- Sharing of the assessment reports by the accreditation body with the scheme owner
- Face to face meetings
- Requirements for the use of databases, assessor training, communication
- Reporting Metrics; such as,
 - Assessment Data
 - Assessor Resources
 - Types of nonconformities identified, analyzed by requirement or process

The next level, Conformity Assessment Bodies (CABs), adhere to various requirement documents (including standards) and may gain accreditation by accreditation bodies. This accreditation and the subsequent accredited conformity assessment activity (by the CAB) is built on the same values and achieves the same intended results as above.

ANAB proposes that we discuss this either in person or over a virtual meeting. We believe this is the best way to convey our thoughts and would like to share the specific ideas for options to structure the program. Please contact Roger Muse at 414-501-5455 or Rmuse@anab.org.