



Americas Committee

3942 North Upland Street

Arlington, VA 22207

Email: ifianac@aol.com

Phone: 703-533-9539

www.ifia-federation.org

April 30, 2012

Hon. Cass R. Sunstein, Administrator
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

Re: Request for Information 2012-7602, 77 FR 19357

Dear Mr. Sunstein:

The IFIA (International Federation of Inspection Agencies) is pleased to submit comments on OMB's Request for Information (RFI) on current issues regarding Federal agencies' standards and conformity assessment related activities and whether and how to supplement OMB Circular A-119 (Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities).

IFIA is the trade association for conformity assessment organizations that provide inspection, testing, and certification services internationally. Upholding the integrity of this service sector is core to the Federation's mission. IFIA was founded in 1982 and members include the leading testing and certification companies from around the world. They cover every field of inspection and related testing and certification making IFIA's work and views truly representative of the profession. IFIA is a non-profit organization. Its objectives are to review and, where possible, to improve the methods, standards, safety procedures and rules used and observed by Members for the benefit of Members and their clients.

Thank you for the opportunity to offer the following comments. If you have any additional questions regarding our submission please feel free to contact the Chairperson of our IFIA Americas Consumer and Industrial Products Committee, Joan Sterling, at 202-265-2278.

Sincerely,

Roger Brockway
Director General

COMMENT

INTERNATIONAL FEDERATION OF INSPECTION AGENCIES (IFIA)

ON OFFICE OF MANAGEMENT AND BUDGET (OMB)

REQUEST FOR INFORMATION (RFI)

FR 2012-7062 Citation 77FR19357

ON FEDERAL PARTICIPATION IN THE DEVELOPMENT AND USE OF VOLUNTARY CONSENSUS STANDARDS AND IN CONFORMITY ASSESSMENT ACTIVITIES

APRIL 30, 2012

The IFIA (International Federation of Inspection Agencies) is pleased to submit comments on OMB's Request for Information (RFI) on current issues regarding Federal agencies' standards and conformity assessment related activities and whether and how to supplement OMB Circular A-119 (Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities).

IFIA is the trade association for conformity assessment organizations that provide inspection, testing, and certification services internationally. Upholding the integrity of this service sector is core to the Federation's mission. IFIA was founded in 1982 and members include the leading testing and certification companies from around the world. They cover every field of inspection and related testing and certification making IFIA's work and views truly representative of the profession. IFIA is a non-profit organization. Its objectives are to review and, where possible, to improve the methods, standards, safety procedures and rules used and observed by Members for the benefit of Members and their clients.

On February 19, 1998, OMB revised Circular A-119 to make the terminology of the Circular consistent with the National Technology Transfer and Advancement Act of 1995 (NTTAA), to issue guidance to the agencies on making their reports to OMB, to direct the Secretary of Commerce to issue policy guidance for conformity assessment, and to make changes for clarity. The NTTAA directed NIST to coordinate conformity assessment activities of Federal, state and local entities with private sector technical standards activities with the goal of eliminating any unnecessary duplication of conformity assessment activities. On August 10, 2000, the National Institute of Standards and Technology (NIST) issued policy guidance on Federal agency use of conformity assessment activities.

Since the 2000 Guidance was issued, market and regulatory developments merit OMB issuance of revised guidance for conformity assessment, in the same vein as for the standards. NIST should return to a coordination role and to help provide oversight in the ongoing assessment of agencies' efforts to implement that guidance. IFIA is concerned that NIST has struggled to meet its mandate under the NTTAA because it has wandered out of a *coordination* role and into a *policy*

role and in some instances has advocated specific methods of conformity. IFIA believes that OMB is in the best position to issue a set of high-level conformity assessment principles that parallel the same set of standards principles existing within the current OMB A-119.

Our responses to the questions that are posed in this FRN will focus primarily on the conformity assessment aspects, rather than the standards aspects, because, with few exceptions, IFIA members are largely standards users. We commit significant resources and participate fully in the consensus standards development process globally.

Conformity Assessment Principles

IFIA supports the following principles:

- (1) reliance on private sector where capabilities and capacity align with needs
 - (2) systems that rewards manufacturers for utilizing third parties, even if the conformity mechanism does not require it
 - (3) compliance with OMB A-76 with respect to government not competing with the private sector
 - (4) restraint in establishing structures that create de facto monopolies
 - (5) minimum accreditation requirements to level the playing field
 - (6) Reciprocity provisions that respect trade commitments while ensuring the competitiveness of the US testing, inspection, and certification industry.
- **Factors Agencies should use in selecting the appropriate conformity assessment procedure, including product/sector specific issues and the level of risk of the non-fulfillment of legitimate regulatory, procurement, or other mission-related activities.**

Conformity assessment is the process used to demonstrate that a product, process, service, or person meets specific requirements. It may include testing, inspection, evaluation, certification, auditing, and surveillance. Conformity assessment may be in the form of 1st party (organization that provides the product such as a manufacturer), 2nd party (organization that uses the product - such as a customer, or that acts in the interests of the user – such as a distributor, retailer, or regulator), or 3rd party (organization that is independent of supplier or user of the product, such as a conformity assessment body).

It is the responsibility of the Agency or Regulator to determine the level of risk in regard to health, safety, and environment in regard to the non-compliance of a product, process, or service. Once the determination is made as to which type of conformity assessment is needed to provide the appropriate level of assurance, the regulators should leverage the private sector's capabilities in providing these conformity assessment services, wherever practicable.

The Agency must balance goals of the program against what level of confidence is needed. That confidence need is based on the risk of non-compliance and what market-driven mechanisms exist as mitigation tools for non-compliance. Part of a full analysis would include the pre-market or post-market structure that would be required. The choice of that structure has implications for costs of related government infrastructure, costs of compliance to all, costs of establishing and sustaining technical competency levels, and capacity of those providing the service.

The principals of 1st party conformity assessment, sometimes referred to as Supplier's Declaration of Conformity, (SDoC), is where the supplier or manufacturer demonstrates product fulfill specified requirements. Manufacturers may perform their own testing on the product as well as assessment of their quality system under which the product is manufactured. Supplier's Declaration of Conformity is typically used in areas where there is a lower level of risk or in non-regulated product areas. It should also be noted that for this type of conformity assessment (1st party) accreditation may or may not be required and there may be no independent assessment of their systems.

The principals of 2nd party conformity assessment is similar to 1st party except that the end user (or entity acting in the interests of the end user) demonstrates for itself that specified requirements are fulfilled. The 2nd Party may assess the manufacturer's process by inspecting the production line and manufacturing process and perform sampling on batches of manufactured product. 2nd party conformity assessment is also used in regulated and non-regulated areas. Unlike 1st party conformity assessment, accreditation is almost never utilized since the entity needing confidence about fulfillment of specified requirements (or its delegate) is performing the conformity assessment activities for itself.

Independent 3rd party conformity assessment provides an independent demonstration to the supply and demand chain such as consumers, manufacturers, and regulators that a product fulfills specified requirements. This type of conformity assessment is much different than 1st or 2nd conformity assessment. 3rd party conformity assessment is used in regulated and non-regulated product areas where there may be a higher risk associated with the installation or use of the product and 2nd Party conformity assessment is not feasible. Many Federal, State, and Municipal regulatory authorities require completion of 3rd Party conformity assessment for products sold or installed within their jurisdiction.

With an independent 3rd party conformity assessment there is assurance that concerns regarding safety, health or environment is not left up to the manufacturer nor a burden for the user. 3rd party conformity assessment can include full laboratory testing and product certification as part of the process. Other critical parts of the process can be factory inspection and market surveillance, to ensure that the manufactured products still complies with the original testing and certification requirements. Independent 3rd party conformity assessment bodies are commonly accredited and regularly assessed by accrediting bodies to perform their requirements under various international ISO/CASCO standards such as; testing (ISO/IEC 17025), inspection (ISO/IEC 17020) and certification (ISO/IEC

Guide 65). This accreditation also includes an in depth review of their documented management systems used to assure ongoing compliance with these international standards. The accrediting bodies may be either Government regulatory bodies, recognized accrediting bodies operating under international guides, or a combination of both.

- **Guidance for regulatory agencies on compliance with relevant international obligations pertaining to conformity assessment and accreditation activities;**

Regulatory agencies should establish baseline requirements for acceptance of accreditation bodies to determine if they have the necessary abilities and technical expertise to assess 3rd parties to US regulatory requirements and the appropriate standards. Participation in an international accreditation body scheme (such as ILAC or IAF) does not guarantee that an accreditation body has sufficient knowledge or competence in the U.S. system of standards and regulations. It is therefore the responsibility of the Regulatory Agency to investigate, review, and verify the qualifications of each accreditation body prior to acceptance.

If the Regulatory Agency chooses to use private sector accreditation bodies to help them implement their conformity assessment program IFIA supports the option to have a choice of multiple qualified accreditation bodies designated by the Regulatory Agency.

While we recognize the mission of Regulatory Agencies does not include trade policy issues, we believe that the Guidance should be developed in accordance with identified United States international trade objectives for parallel treatment of national and international conformity assessment and accreditation activities.

It is necessary for regulatory agencies to take into account when, accepting conformity assessment results from non-domestic conformity assessment bodies, whether there is a system of recognition in their country for the acceptance of the work of accredited US based conformity assessment bodies. This principle of mutual recognition will help insure the equal treatment for manufactures in the US to export with equal treatment as the manufacturers in the non-domestic economy can export to the US. This will help support the US manufacturers, the conformity assessment suppliers, and the jobs they create in the US.

When a Regulatory Agency chooses not to take this into account it sets up a one way system for conformity assessment service providers, and non-domestic manufacturers to enter the US system without any equal opportunity or mechanism for U.S. based conformity assessment providers and manufacturers to gain equal access to other national systems. Failure to do so undermines the stability of a sector that currently is growing in the U.S. and providing thousands of high-skill, high-paying jobs.

An International system of standards and guides (ISO/IEC/CASCO) exists and is in use for the establishment and maintenance of conformity assessment and accreditation activities. It is the position of IFIA that such systems should be relied upon whenever possible.

A specific goal of this process should be to bring other national systems around the world up to the level of protection that the US public enjoys, and not lower those protections of safety, health, and environment down to the lowest common denominator of those systems.

- **Factors agencies should consider in determining whether to recognize the results of conformity assessment and accreditation activities conducted by private sector bodies in support of regulation;**

There are two aspects to this question:

1. Should regulatory agencies use the private sector conformity assessment providers when designing a regulatory compliance program?
2. Should regulatory agencies recognize programs that already exist in the private sector whose results can satisfy the requirements of the regulation?

Agencies are **required** to consider and use conformity assessment services provided by the **private sector** unless they can provide justification as to why this is not adequate. This detailed analysis should be: (a) transparent and (b) undertaken prior to a decision by an agency to establish a program using government provided conformity assessment services.

Regulatory agencies should establish baseline requirements for acceptance of accreditation bodies to determine if they have the necessary abilities and technical expertise to assess 3rd parties to US regulatory requirements and the appropriate standards. Participation in an international accreditation body scheme (such as ILAC or IAF) does not guarantee that an accreditation body has sufficient knowledge or competence in the U.S. system of standards and regulations. Assessments should be based on the use of the same technical requirements. It is therefore the responsibility of the Regulatory Agency to investigate, review, and verify the qualifications of each accreditation body prior to acceptance.

If the Regulatory Agency chooses to use private sector accreditation bodies to help them implement their conformity assessment program IFIA supports the option to have a choice of multiple qualified accreditation bodies designated by the Regulatory Agency.

Both OMB Circular A-76 and OMB Circular A-119 require that the Federal Government **not compete** with the private sector unless extensive justification is provided. Currently there are many conformity assessment programs in which Agencies require manufacturers to use a single government only option. Virtually all of these programs do not require the government provider to demonstrate competence through the accreditation process. In fact there have been a number of recent examples of where the government provider has been investigated and exposed as not being qualified to provide the services for which they are responsible.

It is the position of IFIA that there is significant expertise, capacity, and experience in the private sector to provide conformity assessment services in support of virtually all regulatory requirements. The most recent market analysis of Laboratory Testing Services in the US provided by IBIS World Industry Report 54138, May 2011 shows that there are approximately 8,800 testing laboratories, providing high tech jobs with the average wage of \$70,000. The industry size is 16.3 billion dollars. This data only captures the testing industry, and not the full spectrum of conformity assessment services provided in the private sector.

The breadth of the service providers clearly demonstrates that there is a large, diverse, and extremely competitive industry to provide these services in the US. There is no need for the government to endeavor to compete with the private sector and therefore should leverage programs that exist in the private sector.

An example of how the Regulatory Agencies can leverage this private sector conformity assessment infrastructure is reflected in the existing federal system for recognition of testing and certification bodies administered within the OSHA Nationally Recognized Testing Laboratory Program. The cost to the agency to administer this program is minimal, and achieves its goal of insuring workplace safety by leveraging the extensive private sector service providers. It has a robust accreditation process and maintains the principle of reciprocity.

Agencies should take into account the source of accreditations as well as the scope of accreditation of the conformity assessment body. Agencies should examine the number of participants, the internal governance structure, and the viability of the processes to establish, maintain, and enforce compliance to the requirements. The impartiality and independence of the conformity assessment body is the key to insuring that the results of the conformity assessment process provide the confidence needed by the Agency.

In lieu of developing public sector conformity assessment programs and requirements, private sector programs that have already been developed, implemented, and proven effective should be leveraged.

There are many different programs in the private sector that are managed by conformity assessment bodies and also by manufacturers' trade associations that can provide the necessary confidence needed by the regulatory agencies to support regulations and Agency objectives. The Agency must regularly evaluate these programs to determine if they provide the necessary level of confidence that they require for compliance to safety, health, and environmental needs.

- **Non-regulatory uses of standards (including vendor conformity for purposes of response to procurement solicitations); and**

The use of consensus standards and the accompanying conformity assessment activities that satisfy or further define requirements for the procurement process may provide significant time and cost savings. This would seem to present a useful government procurement method. There would need to be a clear determination as to the method of conformity required and the specific standard required.

Competition from government labs should be prohibited. Both OMB Circular A-76 and OMB Circular A-119 require that the Federal Government **not compete** with the private sector unless extensive justification is provided. The use of subsidized, primarily unaccredited, government labs that were created to address research and development needs of Agencies should not be permitted to perform the conformity assessment services that are needed to assure that products and processes not only meet, but continue to meet the vendor qualification and procurement requirements for compliance.

- **Ensuring that agencies consider how to minimize conformity assessment costs and delays for businesses, especially small and medium sized enterprises, subject to statutory and budgetary constraints and the ability of agencies to fulfill their legitimate regulatory, procurement, or other mission-related objectives.**

Agencies cannot establish a two-tier system that would diminish safety based on the size of the supplier. Once the level of safety requirements is established and the mechanism for demonstrating compliance is chosen then they should be applied consistently across manufacturers/suppliers regardless of size.

The only ways to reduce costs of compliance are either (a) through government tax policy to small and medium sized manufacturers, or (b) for the manufacturer NOT to conduct the required testing and certification. In many respects, third party certification can be more cost-effective for Small and Medium Enterprises because manufacturers and purchasers need not make the significant capital investment required to purchase and install the required testing equipment, or hire staff competent to perform the evaluation of the products. Where manufacturers have invested in and sustained such testing infrastructure, third-parties have programs that validate and utilize that data to help mitigate some costs.

Third parties can provide conformity assessment services more efficiently than manufacturers because they have economies of scale in providing these services. Additionally, competition among certifiers increases effectiveness and efficiency adding to the value of their conformity assessment programs. Finally, many governments recognize that private third party conformity assessment programs can save scarce resources and can help them meet their legislative and regulatory mandates

It is the position of IFIA that there is significant expertise, capacity, and experience in the private sector to provide conformity assessment services in support of virtually all regulatory requirements. The most recent market analysis of Laboratory Testing Services in the US provided by IBIS World Industry Report 54138, May 2011 shows that there are approximately 8,800 testing laboratories, providing high tech jobs with the average wage of \$70,000. The industry size is 16.3 billion dollars. This data only captures the testing industry, and not the full spectrum of conformity assessment services provided in the private sector.

The breadth of the service providers clearly demonstrates that there is a large, diverse, and extremely competitive industry to provide these services in the US.

For purposes of cost control, efficiency, and time to market agencies should leverage the private sector systems already in place to provide the needed conformity assessment.

Competition from government labs should be prohibited. Both OMB Circular A-76 and OMB Circular A-119 require that the Federal Government **not compete** with the private sector unless extensive justification is provided. The use of subsidized, primarily unaccredited, government labs that were created to address research and development needs of Agencies are not qualified to perform the conformity assessment services that are needed to assure that products and processes not only meet, but continue to meet the regulatory requirements for compliance.

Additionally, training for SMEs to make sure they fully understand the regulatory requirements and potential design issues can help reduce the time it takes to prove compliance to the conformity assessment requirements. Harmonization of standards and systems will greatly reduce the cost of compliance for companies that distribute in multiple markets.

In lieu of developing public sector conformity assessment programs and requirements, private sector programs that have already been developed, implemented, and proven effective should be leveraged.

- **Should OMB provide guidance to agencies on when it is appropriate to allow the use of more than one standard or more than one conformity assessment procedure to demonstrate conformity with regulatory requirements or solicitation provisions?**

The decision of which standard to use, and which conformity assessment method is used to demonstrate conformity is directly related to the objectives of the regulatory agency and the risks of non-compliance.

Conformity assessment is the process used to demonstrate that a product, process, service, or person meets specific requirements. It may include testing, inspection, evaluation, certification, and surveillance. Conformity assessment may be in the form of 1st party (organization that provides the product such as a manufacturer), 2nd party (organization that uses the product such as a customer), or 3rd party (organization that is independent of manufacturing or user of the product, such as a conformity assessment body).

The requirement for a particular level of rigor in the conformity assessment process is generally determined by the risks associated with non-compliance. The appropriate conformity assessment mechanism is also determined by other market factors, such as the legal system and the general philosophy approach of premarket conformity assessment vs. fully funded post market surveillance. The U.S. enjoys a high level of safety, health, and environmental compliance, and should strive to bring other countries systems up to the level enjoyed in the U.S., and not lower the protections we enjoy in the U.S. system.

Guidance should include a mechanism for evaluation that insures that the method of demonstrating compliance (1st, 2nd, 3rd party) is no less rigorous than the

minimum required method of conformity assessment. Guidance should detail how an Agency can accept a method that provides a higher level of confidence than they specify. This guidance should also include an evaluation of the technical requirements on which that conformity assessment is based to determine if they are truly equivalent.

For example, even with harmonization of requirements, there are still national differences that cannot be ignored. This illustrates the importance of national treatment for service providers so that they can take varied requirements of multiple markets into account and bundle into a set of streamlined testing and certification services for manufacturers.

If a higher confidence level of conformity assessment has been applied using the adopted/recognized standard, then it would make sense to accept this more rigorous form to reduce duplicative testing and burdens on manufacturers. Conversely, it would not be prudent for Regulatory Agencies to accept compliance as being equivalent if the method of conformity was less rigorous.

- **Where an agency is requested by stakeholders to consider allowing the demonstration of conformity to another country's standard or the use of an alternate conformity assessment procedure as adequate to fulfilling U.S. requirements, should OMB provide guidance to agencies on how to consider such requests?**

This is a complicated technical question. Generally these requests are framed as "equivalence issues". Under the ISO/IEC standards system there is a mechanism that allows adoption of a particular standard with the appropriate national differences required for individual countries. These standards then become national standards and can easily be used in regulations.

If a standard did not go through this system, then a full analysis of the differences of particular standards would need to be undertaken, with a mechanism for public review.

In relation to conformity assessment procedures we question what an "alternate conformity assessment procedure" means"? Does this mean a different method? There are distinct differences between the different methods of conformity assessment, which include the legal systems and the regulatory enforcement systems.

Conformity assessment is the process used to demonstrate that a product, process, service, or person meets specific requirements. It may include testing, inspection, evaluation, certification, and surveillance. Conformity assessment may be in the form of 1st party (organization that provides the product such as a manufacturer), 2nd party (organization that uses the product such as a customer), or 3rd party (organization that is independent of manufacturing or user of the product, such as a conformity assessment body).

The principal of 1st party conformity assessment, sometimes referred to as Supplier's Declaration of Conformity, (SDoC), is where the supplier or manufacturer self assesses conformity and declares that their product meets the requirements of a standard. Manufacturers may perform their own testing on the product as well as their quality system. Supplier's Declaration of Conformity is

typically used in areas where there is a lower level of risk or in non-regulated product areas. It is however quite popular with manufacturers in regulated areas within the European Union (EU).

There are likely many differences between the non-U.S. standards and the standards adopted here in the U.S. An example is differences in the installation requirements that may not be addressed in the National Electrical Code. It should also be noted that for this type of conformity assessment (1st party) there is no accreditation required and there may be no independent assessment of their systems.

The 2007 investigation and report by the European commission (**Regulation of the European Parliament and of the Council Setting out the Requirements for Accreditation and Market surveillance Relating to the Marketing of Products and a Decision of the European Parliament and of the Council on a Common Framework for the Marketing of Products**) clearly details a host of problems with the implementation and lack of compliance with the current system. As the report details, one of the most important components of this system is a fully functioning post market surveillance system. Unfortunately this integral component has had a history of a lack of the required government funding resulting in a predictable lack of compliance.

The requirement for a particular level of rigor in the conformity assessment process is generally determined by the risks associated with non-compliances. The U.S. enjoys a high level of safety, health, and environmental compliance, and should strive to bring other countries systems up to the level enjoyed in the US, and not lower the protections we enjoy in the U.S. system.

If a higher confidence level of conformity assessment has been applied using the adopted/ recognized standard, then it would make sense to accept this more rigorous form to reduce duplicative testing and burdens on manufacturers. Conversely, it would not be prudent for Regulatory Agencies to accept compliance as being equivalent if the method of conformity was less rigorous.

For example, if a Federal agency required accredited testing but the industry is already using accredited product certification, then the agency should be allowed to accept product certification to fulfill its regulatory requirements. However, accrediting testing would still remain the floor and still meet regulatory requirements.

- **Have there been any developments internationally—including but not limited to U.S. regulatory cooperation initiatives—since the publication of Circular A-119 that OMB should take into account in developing a possible supplement to the Circular?**

While there has been much discussion in many forums regarding regulatory “cooperation” and other issues in this area it is clear that individual regulators have widely different views on how to implement the practices they believe are in the best interest of protecting their citizens’ safety and health. Many factors are involved in the decisions as to the appropriate standards and the confidence level

of the type of conformity assessment used to demonstrate compliance. These include seemingly unrelated issues such as individual legal systems and the ability to enforce requirements.

What is encouraging in these regulatory cooperation forums especially that of the U.S.-Canada Regulatory Cooperation Council, is a mindset shift in a robust engagement with the private sector throughout the cooperation process. Regulators from both countries appear to be committed to institutionalizing the engagement with the private sector so that this engagement as part of the RCC becomes a daily way of doing business, rather than something that gets dabbled in from time to time. This mindset is representative of the philosophy and principles IFIA believes should be reflected in OMB A-119 as it relates to conformity assessment.

IFIA believes that the U.S. conformity assessment system can no longer be a “bargaining chip” in trade negotiations because it is the key to market access globally.

IFIA believes that the U.S. conformity assessment industry is placed at a disadvantage when U.S. agencies accrediting or accepting accreditation of foreign conformity assessment bodies do so without regard to whether those foreign governments provide reciprocal accreditation. For manufactured goods, trade officials typically require that market access for non-domestic goods is dependent upon similar market access for domestic goods.

Over time, this lack of national treatment for U.S. conformity assessment bodies has a negative impact on high-paying engineering jobs in the United States and on U.S. exports. U.S. manufacturers benefit from both National Treatment and reciprocity by having local access to conformity assessment services for foreign regulations. This allows streamlining of requirements and can significantly reduce duplicative testing for manufacturers.

Conclusion

IFIA recommends that OMB develop and issue conformity assessment principles that parallel those of OMB A-119’s principles on standards.

IFIA further requests that OMB ask NIST to develop a measurement process for reducing duplication and complexity in conformity assessment in the United States. While Congress gave NIST the goal of reducing and eliminating duplication in conformity assessment in the United States, they did not require a system or systems to measure whether NIST is achieving those goals in the same way they required for standards.

As a non-regulatory agency, NIST should not engage in specifying the “method of conformity” to a particular regulatory agency or agencies, and should not specify particular organizations to fill a particular need. Those decisions should be left to the regulator through an open and transparent consultation process. In other words NIST should be “**method-neutral**” in its approach to coordinating conformity assessment in the United States.

IFIA believes that an OMB set of high-level conformity assessment principles should include a requirement that Agencies provide information to NIST for reporting when the justifications for choosing to implement a public sector conformity assessment program in lieu of using the private sector. This report should be similar to the concept behind the set of standards principles existing within the current OMB A-119. A redefined NIST role in a supplement to A-119 will meet the letter and intent of the NTTAA and enhance the global competitiveness of United States conformity assessment industry.