



19 November 2014

Government Agencies Compete with Private Sector Accreditation Bodies

Conformity assessment (i.e., testing, inspection and certification) carried out by third-party private sector organizations is well established and recognized by several federal agencies. When the outcome of conformity assessment activity has significant health, safety and financial implications, there is a need to provide a formal assurance of the competence of conformity assessment bodies and accreditation by internationally recognized accreditation bodies should be the preferred means of assurance. There is long-standing government policy that supports use of private sector accreditation infrastructure (OMB Circular A-119).

The infrastructure in the form of the multilateral mutual recognition arrangements (Arrangements) of the International Laboratory Accreditation Cooperation (ILAC)(www.ilac.org) and the International Accreditation Forum (IAF)(www.iaf.nu) are already in place for recognizing accreditation bodies. So, there is no reason for federal agencies to administer their own system, either for the accreditation themselves or for recognition of accreditation bodies. ILAC is an international cooperation of laboratory and inspection accreditation bodies formed more than 30 years ago to help remove technical barriers to trade. The ILAC Arrangement (MRA) has been in place since 2000. IAF is the world association of conformity assessment accreditation bodies and other bodies interested in certification in the fields of management systems, products, services, and persons. The IAF Arrangement has been in place since 1998. Both Arrangements are based upon results of rigorous, periodic peer evaluations to ensure that accreditation bodies are capable of determining competence in their respective field of operation. Several federal agencies including the CPSC, EPA, DoD, FHWA, Coast Guard and NRC already rely upon the ILAC Arrangement and many of the representatives of those agencies participate in the ILAC Arrangement Committee.

If a government agency has special requirements for conformity assessment and accreditation, these may be used by existing accreditation bodies to supplement their current programs. ILAC-recognized accreditation bodies work with the World Anti-Doping Agency in a similar way. Development of new, competitive programs simply adds unnecessary duplication and costly burdens on laboratories and certification bodies which then find the need to maintain several accreditations. Conformity assessment activities occur in all 50 states and touch every major industry. Government involvement in third party conformity assessment activities creates unnecessary duplication and increased costs all passed on to the consumer.

The 1995 National Technology Transfer and Advancement Act (NTTAA) was intended to reduce this unnecessary duplication. NIST was assigned a coordination function (15 USC 272, Chapter 7 (b)(13): "to coordinate Federal, State, and local technical standards activities and conformity assessment activities, with private sector technical standards activities and conformity assessment activities, with the goal of eliminating unnecessary duplication and complexity in the development and promulgation of conformity assessment requirements and measures."

There are many other federal agencies providing accreditation programs that could be carried out by the private sector.

Congress should hold hearings on the NTTAA and the apparent ineffectiveness at eliminating duplication and elimination of government-run accreditation bodies/programs that wastes taxpayer dollars and increases costs to the consumer. Further, by reducing duplication, competition will be enhanced through affording more opportunities to small businesses (e.g., laboratories) resulting in significant efficiencies and cost savings.

Peter Unger
President & CEO
punger@A2LA.org