

# ANSI ASC A117 COMMITTEE OFFICIAL INTERPRETATIONS POLICY AND PROCEDURES

## Section 1 - General

**1.1 Purpose.** The purpose of the A117 Committee's official interpretations activity is to provide official explanations of the meaning or intent of any specific provision or provisions of the CABO/ANSI A117.1 National Standard on Accessible and Usable Buildings and Facilities.

**1.2 Scope.** The scope of the official interpretations process is limited to interpreting the literal text of the A117.1 standard or to interpreting the A117 Committee's intent on the subject addressed by the text. A request for an official interpretation shall not be processed if it involves:

- (a) determination of compliance of a design, installation, or product;
- (b) determination of compliance of an equivalency;
- (c) review of project plans or specifications;
- (d) judgment or knowledge that is not readily available in the inquiry or which can only be acquired as a result of on-site inspection;
- (e) an issue that cannot be clearly and concisely phrased in the question asked;
- (f) text that clearly provides the requested information; or
- (g) subjects that were not previously considered by the A117 Committee or that are not addressed in the A117.1 standard.

**1.3 Limitations.** A statement, written or oral, that is not processed in accordance with this Official Interpretations Policy and Procedures shall not be considered the official position of the A117 Committee and shall not be considered the official position of the A117 Committee and shall not be considered to be, nor relied upon as, an official interpretation.

**NOTE:** This official interpretations procedure does not prevent the Chair, Secretariat or any Member from expressing a personal opinion on the meaning or intent of the A117 Committee on any provision of the A117.1 standard, provided that: (a) the person rendering the opinion orally or in writing clearly states that the opinion is personal and does not necessarily represent the position of the A117 Committee and shall not be considered to be or relied upon as such; and (b) written opinions are rendered only in response to written requests and a copy of the request and the response is sent to the Secretariat.

**1.4 Editions to be interpreted.** Official interpretations shall be rendered on the text of the requested edition of the A117.1 standard. The interpretation shall also apply to and be issued on the current edition of the standard if the text is identical, unless deemed inappropriate by the A117 Committee.

## **Section 2 - Requesting Official Interpretations**

**2.1 Submitter.** A request for an official interpretation shall be permitted to be submitted by any person.

**2.2 Method.** The request shall be submitted in writing to the Secretariat. The request shall include a statement in which shall appear specific references to a single problem and identifying the portion (section, paragraph, etc.) of the A117.1 standard and edition of the standard on which the interpretation is requested.

**2.3 Format of Question.** The request shall include a specific question or series of questions clearly worded so as to solicit a Yes or No answer from the A117 Committee.

## **Section 3 - Processing**

**3.1 Evaluation.** Each request received shall be reviewed by a three-person panel, appointed from the A117 Committee membership by the Chair, and judged for conformance with 1.2. Any request judged as not conforming with 1.2 shall be returned to the submitter with an explanation.

**3.2 Preliminary Interpretation.** The Secretariat shall prepare a preliminary interpretation that answers the question, preferably by a Yes or No, but where additional explanation is needed the answer shall be permitted to include other wording. The preliminary interpretation shall include the edition year and section/paragraph reference on which the interpretation was requested, the complete wording of the interpretation question, and the answer as prepared by the Secretariat. A copy of the preliminary interpretation shall be forwarded to each A117 Committee member for balloting. A copy of the preliminary interpretation shall be forwarded to the submitter with an explanation that the proposed answer must be balloted and thus is preliminary in nature.

**3.3 Balloting.** The preliminary interpretation shall be letter balloted by the A117 Committee. The accompanying ballot form, distributed by the Secretariat, shall allow only for votes or Approve, Hold, or Abstain. A vote of Hold shall include an explanation of the disagreement requiring resolution as detailed in 3.4. A vote of Abstain shall include the reason for the abstention. Committee members shall return their ballots by the indicated deadline established by the Secretariat to allow six weeks between ballot mailing and return deadline.

**3.4 Holds.** Any ballot with a vote of Hold shall be accompanied by a written statement explaining the committee member's reason for the hold and that substantiation required by this paragraph shall cause the preliminary interpretation to be placed on hold while the Secretariat circulates the substantiating material as a revised preliminary interpretation to permit members to approve or disapprove this revised preliminary interpretation.

**3.5 Approval/Issuance.** The Secretariat shall issue the interpretation as an official interpretation upon receiving a three-quarters majority vote of Approve as tallied in accordance with 3.6. In issuing the official interpretation, the Secretariat shall distribute a copy to the submitter, all Committee members, ANSI and, as appropriate, the media.

**3.6 Calculating Votes.** A member eligible to vote shall be one who is a A117 Committee member as of the date of the mailing of the ballot. In calculating the base against which the three-quarters majority vote is compared, those who have expressed in writing valid reasons for abstaining and those who fail to return their ballots shall be omitted. In all cases, an Approve vote of at least a simple majority of the total membership eligible to vote shall be required.

**3.7 Applicability.** Any official interpretation issued shall apply to the edition of the A117.1 standard for which the interpretation is made and to any other edition of the standard where the text is identical to the text of the edition on which the official interpretation was rendered unless deemed inappropriate by the A117 Committee.

#### **Section 4 - Action Following Issuance of Official Interpretations**

**4.1 Review.** The A117 Committee shall review the portion of the A117.1 standard on which the interpretation was issued to determine whether any change might be desired to the text of the standard. If such change is indicated, the Committee shall process such change for the next edition of A117.1 in conformance with established procedures. Upon issuance of the revised edition of A117.1 the interpretation shall be rescinded.

#### **Section 5 - Records**

**5.1 Retention.** Complete records of matters pertaining to official interpretations shall be maintained by the Secretariat for a period of five years.