



Asbestos Analysts Registry Policy

Revised: September 22, 2016

Effective: September 23, 2016

AIHA Registry Programs[®]
3141 Fairview Park Dr Ste 777
Falls Church, VA 22042 USA
Registries@aiha.org
www.aiha.org/registries/aar
main +1 703-846-0755
fax +1 703-207-8558

TABLE OF CONTENTS

ARTICLE I

AAR PROGRAM OVERVIEW

1.1 PURPOSE	1
1.2 TECHNICAL OVERSIGHT	1

ARTICLE II

QUALITY SYSTEM REQUIREMENTS

2.1 SCOPE	2
2.2 ANALYST TRAINING AND ORGANIZATION AFFILIATION	2
2.2.1 Analyst / Organization Affiliation	2
2.2.2 Technical Training (NIOSH 582)	2
2.2.2.1 AIHA Registry Programs Listed NIOSH 582 Equivalent Courses	2
2.2.2.2 Non-AIHA Registry Programs Listed NIOSH 582 Equivalent Courses	2
2.2.2.3 Maintenance of AIHA Registry Programs Listed NIOSH 582 Equivalent Course Listing	3
2.2.3 Quality System Training	3
2.2.4 Probationary Period	3
2.3 QUALITY ASSURANCE/QUALITY CONTROL PROGRAM	3
2.3.1 Quality Manual	3
2.3.2 Quality Assurance Objectives	4
2.3.2.1 Accuracy and Bias	4
2.3.2.2 Precision	4
2.3.2.3 Acceptance Limits	4
2.3.2.4 Control Charts	4
2.3.3 Manual Acceptance, Maintenance and Revision	4
2.3.4 Personnel Qualifications and Training	4
2.3.5 Sample Receiving, Handling and Processing	4
2.3.6 Equipment and Microscope Maintenance	5
2.3.6.1 Microscope Maintenance Log	5
2.3.6.2 Microscope Alignment and Calibration	5
2.3.6.3 Microscope Image Quality Check	5
2.3.7 Internal Quality Control	5
2.3.7.1 Reference Slide Analysis	5
2.3.7.1.4 Reference Slide Control Charts	6
2.3.7.2 Recount Analysis	6
2.3.7.3 Blank Analysis	6
2.3.8 Round Robin Participation	6
2.3.9 Corrective Action	7
2.3.10 Record Keeping	7
2.3.11 Sample Retention and Disposal	7
2.3.12 Internal Systems Audit	7
2.3.13 Analytical Methods and Field Considerations	7
2.3.13.1 On-Site Housekeeping	7
2.3.13.2 On-Site Filter Mounting	7
2.3.13.3 On-Site Environmental Requirements	7
2.3.14 Final Reporting	7
2.3.15 Safety and Health	8

ARTICLE III	
REQUIREMENTS AND CONDITIONS FOR AAT PARTICIPATION	
3.1 INITIAL ENROLLMENT AND FEES	9
3.2 SAMPLE DISTRIBUTION	9
3.3 SAMPLE RECEIPT	9
3.4 SAMPLE ANALYSIS	9
3.5 SUBMISSION OF DATA	9
3.6 OUTLIERS	10
3.7 PROFICIENCY	10
3.8 RETESTING	10
3.9 NON-PARTICIPATION	10
3.9.1 Analyst Non-Participation	10
3.9.2 Organization Non-Participation	10
3.9.3 Suspension of Analysts / Organizations	10
3.10 AAT PERFORMANCE RESULTS REPORT	10
3.11 PRACTICE ROUNDS	11
3.12 ADDITIONAL REQUIREMENTS AND CONDITIONS FOR AAT PARTICIPATION FOR AN EXPEDITED ANALYST APPLICATION	11
3.12.1 Initial Enrollment and Fees	11
3.12.2 Proficiency	11
3.12.3 Retesting	11
 ARTICLE IV	
AAR ORGANIZATION AND ANALYST REGISTRATION PROCESS	
4.1 INITIAL ORGANIZATION REGISTRATION	12
4.2 ANALYST REGISTRATION	12
4.3 REGISTRATION PROCESS	14
4.4 REGISTRATION PROCESS: ADDITIONAL CONSIDERATIONS FOR AN EXPEDITED ANALYST APPLICATION	15
4.5 MAINTENANCE OF LISTING	16
4.5.1 Analysts	16
4.5.2 Reporting of Significant Changes Within an Organization	16
4.5.3 Triennial Renewal	16
4.6 MAINTENANCE OF ASSOCIATED FEES	16
 ARTICLE V	
SUSPENSION, REVOCATION OR DENIAL OF REGISTRATION	
5.1 GROUNDS	17
5.2 SUSPENSION	17
5.3 REMOVAL PROCESS	18
5.4 PROCESS FOR DENIAL OF REGISTRATION	19
 ARTICLE VI	
APPEALS PROCESS	
6.1 RIGHT TO APPEAL	19
6.2 NOTICE OF APPEAL	19
6.3 APPEALS PANEL	19
6.4 APPEALS HEARING	19
6.4.1 Site of Hearing	19

6.4.2 Representation by Counsel	19
6.4.3 Stenographic Record	19
6.4.4 Attendance at Hearing	19
6.4.5 Parties	20
6.4.6 Order of Proceedings	20
6.4.7 Evidence	20
6.4.8 Adjournment.....	20
6.4.9 Closing the Appeals Hearing.....	20
6.4.10 Reopening the Appeals Hearing	20
6.4.11 Report of the Appeals Committee	20
6.5 FINAL DECISION	20
ARTICLE VII	
ADVERTISING	
7.1 ADVERTISING POLICY	22
7.1.1 Advertising Wording.....	22
7.1.1.1 Organizations.....	22
7.1.1.2 Organizations With Multiple Locations.....	22
7.1.1.3 Registered Analysts	22
7.1.2 Suspended Organizations or Analysts.....	22
7.2 VARIATION IN ADVERTISING	22
ARTICLE VIII	
MISCELLANEOUS	
8.1 INDEMNITY	23
8.2 REPRESENTATION OF REGISTRATION	23
8.3 LIST OF AIHA REGISTRY PROGRAMS REGISTERED ORGANIZATIONS AND REGISTERED ANALYSTS	23
8.4 CONFIDENTIALITY OF RECORDS	23
8.5 CONFLICTS OF INTEREST.....	23
8.6 FEES.....	23
8.7 FEEDBACK FROM PARTICIPATING ORGANIZATIONS/ANALYSTS	23
8.8 COMPLAINTS.....	23
ARTICLE IX	
APPENDICES	
APPENDIX A: ABBREVIATIONS AND TERMS	24
APPENDIX B: INITIAL ORGANIZATION REGISTRATION PROCESS	28
APPENDIX C: ANALYST REGISTRATION PROCESS	29
APPENDIX D: EXPEDITED ANALYST REGISTRATION PROCESS.....	30
APPENDIX E: AAR REMOVAL PROCESS.....	31
APPENDIX F: AAR APPEALS PROCESS	32

ARTICLE I

AAR PROGRAM OVERVIEW

1.1 PURPOSE

The primary purpose of the AIHA Registry Programs® Asbestos Analysts Registry (AAR) is to establish and maintain the highest possible standards of performance for analysts who perform fiber counting of air samples on the job site. The AAR program ensures continued high levels of professional performance by the organization and its affiliated analysts through the following:

- 1.1.1 Requiring the organization and its affiliated analysts to submit applications that demonstrate that the organization and its affiliated analyst(s) meet the requirements set forth in this policy document;
- 1.1.2 Conducting a registry program that will encourage fiber-counting analysts to perform procedures with adequate controls using acceptable equipment and methods;
- 1.1.3 Maintaining surveillance of analysts' performance in the Asbestos Analysts Testing (AAT) program; and
- 1.1.4 Auditing of the AAR organization and affiliated analysts on a triennial basis to ensure continued compliance with the standards of the AAR program.

1.2 TECHNICAL OVERSIGHT

The Subject Matter Expert (SME) group shall provide technical guidance and support to the AIHA Registry Programs.

- 1.2.1 The SME group is comprised of 3 or more volunteer persons who have subject matter expertise pertinent to the registry.
- 1.2.2 SME group members will serve a two (2) year, renewable term.
- 1.2.3 The SME group has the following responsibilities to the AIHA Registry Programs:
 - a) Provide independent scientific and technical oversight of the registry program
 - b) Review of Organization and Quality Audit applications.
 - c) Review and revise AAR policies
 - d) Be available as on-call experts for technical questions
 - e) Serve, as needed, on the Technical Review Board to provide recommendations to management regarding technical aspects of the AIHA Registry Programs
- 1.2.4 SME members shall comply with the AIHA Registry Programs Conflict of Interest Policy.

ARTICLE II

QUALITY SYSTEM REQUIREMENTS

2.1 SCOPE

To achieve and maintain listing under the AAR program, the organization and its affiliated analyst(s) shall meet all quality system requirements as detailed in this Article. The organization's quality system shall reflect the actual operations and quality assurance/quality control (QA/QC) program in place for the organization. The organization shall meet the requirements of the OSHA 29 CFR 1910.1001 Appendix A, the current version of the NIOSH 7400 method and the other AIHA Registry Programs-specific requirements as detailed in this policy document.

2.2 ANALYST TRAINING AND ORGANIZATION AFFILIATION

Analysts shall be trained in both the method of analysis and the quality control procedures of the organization. The training program shall be written and shall include demonstration of proficiency. The training program shall be ongoing to develop and maintain the analyst's abilities to carry out the methods and procedures used by the organization. Records shall be kept to document the qualifications and training of all personnel.

2.2.1 Analyst / Organization Affiliation

An analyst who is registered with an organization shall be affiliated with this organization as follows:

2.2.1.1 The analyst shall perform analysis under the approved quality system of the organization. This includes all practices outlined in the organizations quality manual, in particular, but not limited to:

- a) assignment of unique sample identification
- b) Chain of Custody procedures
- c) sample handling
- d) equipment calibration and maintenance
- e) quality control procedures
- f) field preparation and analysis procedures
- f) internal record system
- g) reporting

2.2.1.2 The analyst's QC data shall be reviewed to determine when corrective action is necessary.

2.2.2 Technical Training (NIOSH 582 or equivalent)

The analyst shall submit documentation as evidence that he/she has successfully completed a thirty (30) contact hour (minimum) course in the analysis of airborne fibers. The NIOSH 582 course is considered the basis by which any internal or external equivalent training course is judged. The analyst shall also document the dates of his/her probationary period (period between completion of the NIOSH 582, or equivalent course, and unsupervised analyses).

2.2.2.1 AIHA Registry Programs Listed NIOSH 582 Equivalent Courses

Certain courses have been reviewed by the AIHA Registry Programs as NIOSH 582 equivalent based upon course information and instructor qualifications submitted to the AIHA Registry Programs by the course provider. A certificate of completion from an AIHA Registry Programs listed course is acceptable to the AIHA Registry Programs, LLC as evidence of NIOSH 582 equivalent training.

2.2.2.2 Non-AIHA Registry Programs Listed NIOSH 582 Equivalent Courses

Applicants submitting a certificate of completion for a NIOSH 582 equivalent training course not on the AIHA Registry Programs listing of reviewed courses will be required to submit a description of the course as evidence of equivalent training. The description shall include dates of training, course outline, contact hours, and record of final

examination/test.

2.2.2.3 Maintenance of AIHA Registry Programs Listed NIOSH 582 Equivalent Course Listing

Providers of listed courses shall provide updated information, as requested by the AIHA Registry Programs, to demonstrate that the course is current and still meets the requirements for NIOSH 582 equivalency. Failure to respond to the request for update information will result in the removal of the course from the web listing of reviewed courses and placement of the course on an internal list of historical providers.

2.2.3 Quality System Training

The organization shall document the analyst's training in the organization's QA/QC program. Analysts shall be trained in-house as outlined in the most current edition of the AIHA *Laboratory Quality Assurance Manual for Industrial Hygiene Chemistry*, Chapter 11.

2.2.4 Probationary Period

All analysts affiliated with an organization that are to be registered shall have a probationary period defined. This is a time, determined by the organization, during which the analyst performs analysis under supervision, or where their results are checked by the QA manager for proficiency and accuracy and the analyst is trained in the organization's quality system. Typically, this time would include repeated analysis of reference slides and recounts of field samples previously analyzed by other analysts with review of this data for bias and accuracy. The AIHA Registry Programs recommends a probationary period be at least 2 weeks.

2.3 QUALITY ASSURANCE/QUALITY CONTROL (QA/QC) PROGRAM

All organizations seeking approval and subsequent registration of its affiliated analysts shall have in place a thoroughly documented quality system. The organization's quality system shall reflect the actual Quality Assurance/Quality Control (QA/QC) program in place and be in accordance with the most current edition of the AIHA *Laboratory Quality Assurance Manual*. The QA/QC program shall address the requirements of the approved method used and the special requirements of analysis in the field. Program elements shall include the following:

2.3.1 Quality Manual

The organization's quality system shall be documented in a quality manual (however named) or in the organization's Standard Operating Procedures (SOP) and shall be consistent with the QA/QC requirements of the NIOSH 7400 method, the OSHA 29 CFR 1910.1001 Appendix A, and the AIHA Registry Programs specific requirements detailed in this policy document. A quality manual shall employ process controls to ensure adequate confidence that the end analysis performed will fulfill the requirements. Quality assurance programs shall have the operational techniques and activities used to fulfill requirements for quality analysis in the organization. The quality manual shall reflect the QA/QC requirements of the approved methods used. The quality manual shall be updated whenever necessary, and reviewed and approved at least annually. The quality manual shall be accessible to all analytical personnel. The quality manual or SOP shall minimally include or address the following.

- a) Table of Contents
- b) Quality Assurance Objectives
- c) Manual Acceptance, Maintenance and Revision
- d) Personnel Qualifications and Training
- e) Sample Receiving, Handling and Processing
- f) Equipment and Microscope Maintenance
- g) Internal Quality Control Procedures
- h) Round Robin Participation
- i) Corrective Action
- j) Record Keeping
- k) Sample Retention and Disposal
- l) Internal Systems Audit

- m) Analytical Methods and Field Analysis Considerations
- n) Final Reporting
- o) References to Other Quality System Documentation
- p) Header or Footer With Page Numbers and Effective Date

2.3.2 Quality Assurance Objectives

Sufficient standards of practice shall be included in the QA program to prevent error, sample contamination and analysts' exposure to asbestos. The analysts shall adhere to all stated QA/QC requirements in the methods used. The analysts shall determine, where feasible, the precision and bias of all analyses performed.

2.3.2.1 Accuracy and Bias

Accuracy and bias studies are performed to determine how close a measurement comes to an actual or theoretical value by way of using statistical techniques as recommended by the most current NIOSH 7400 method.

2.3.2.2 Precision

Precision is evaluated by the reproducibility of analyses. Precision is commonly expressed as standard deviation or relative percent difference and can be evaluated through the analysis of replicate samples.

2.3.2.3 Acceptance Limits

Acceptance limits shall be established based on statistical evaluation of the data generated by the analysis of quality control check samples. Calculation procedures for statistically derived acceptance limits shall be documented.

2.3.2.4 Control Charts

Control charts or quality control databases shall be used to record quality control data and compare quality control data with acceptance limits.

2.3.3 Manual Acceptance, Maintenance and Revision

2.3.3.1 The policy and process for quality manual acceptance, maintenance and revision shall be included in the quality manual.

2.3.3.2 The quality manual shall be reviewed annually at a minimum.

2.3.3.3 The process for quality manual acceptance, maintenance and revision shall be documented.

2.3.4 Personnel Qualifications and Training

See section 2.2 for more information.

2.3.4.1 The analyst training program, including the probationary training and training in the quality system, will be included in the quality manual. The training shall be documented.

2.3.4.2 Personnel qualifications, including the analysts' NIOSH 582 or equivalent course certificate, will be kept on record.

2.3.5 Sample Receiving, Handling and Processing

2.3.5.1 The organization shall have a written procedure for sample receiving, sample log-in, assignment of unique sample number, Chain of Custody or Internal Record System, and sample handling.

2.3.5.2 Records shall be maintained that include the following information about sample

receiving, sample log-in, assignment of unique sample number, Chain of Custody or Internal Record System and sample handling:

2.3.5.2.1 A sample numbering and tracking system;

2.3.5.2.2 An internal record system for each sample that includes sample receipt date, analysis performed, methods and results (*AIHA Laboratory Quality Assurance Manual*, Chapter 5); and

2.3.5.2.3 A customer report to include organization and customer identification, report date, sample identification, analytical method reference and analytical results (*AIHA Laboratory Quality Assurance Manual*, Chapter 10).

2.3.6 Equipment and Microscope Maintenance

Equipment shall be appropriate for the analysis being performed.

2.3.6.1 The minimum equipment available to the analysts shall include:

- a) Positive phase contrast microscope
- b) Walton-Beckett graticule
- c) Phase shift test slide (HSE/NPL)
- d) Equipment for preparing slides
- e) Stage Micrometer with 0.01 mm divisions

2.3.6.2 Microscope Maintenance Log

An equipment log shall be maintained for each microscope and any other instrumentation, including records of in-house preventive maintenance service.

2.3.6.3 Microscope Alignment and Calibration

Microscope setup and calibration procedures for in-the-field analysis, including the determination of the graticule area, shall be included in the quality manual. Analysts shall document the use of these procedures.

2.3.6.4 Microscope Image Quality Check

Microscope setup and calibration procedures for in-the-field analysis shall be documented, including the use of the HSE/NPL phase shift test slide.

2.3.7 Internal Quality Control

Quality assurance for procedures for each field analyst, including daily reference slide count charts and ten percent (10%) blind recounts with statistical calculation and evaluation, shall be documented in the quality manual or SOP. Procedures shall follow the most current edition of the *AIHA Laboratory Quality Assurance Manual*, Chapter 11.

2.3.7.1 Reference Slide Analysis

A library of permanently mounted reference slides shall be maintained for use by each analyst. Prior to the analysis of samples each day, the analyst shall count a randomly selected reference slide from the reference slide library. The result shall fall within the documented control limits established for that slide before fiber count analysis may be conducted on field samples.

2.3.7.1.1 The policy on reference slide selection and analysis and the procedure for the generation of upper control limits (UCL) and lower control limits (LCL) for each sample or Coefficient of Variation (CV) shall be included in the quality manual.

2.3.7.1.2 The library of reference slides shall contain reference slides which are loaded, minimally, to the three ranges outlined in the current version of the

NIOSH 7400 method (5-20 fibers in 100 graticule fields, 20-50 fibers in 100 graticule fields, and >50 fibers in 100 graticule fields).

2.3.7.1.3 Records shall be maintained that demonstrate the analysis of a randomly selected reference slide from the reference slide library every day that samples are analyzed by each registered analyst. The same reference slide shall not be analyzed on consecutive days. Reference slide records shall demonstrate that analysts have read from each of the fiber loading ranges over time.

2.3.7.1.4 Reference Slide Control Charts

Control charts or other statistical evaluation shall be documented on the repeat analysis of the reference slides to determine the UCL and LCL or CV for the slide or fiber loading range. A minimum of twenty (20) data points shall be used to determine the UCL, LCL or CV.

2.3.7.2 Recount Analysis

Same-counter Recounts (blind, when possible) shall be performed on at least 10% of the samples analyzed. Statistical determination of the acceptability of the recount shall be performed in accordance with the current version of the NIOSH 7400 method and the *AIHA Laboratory Quality Assurance Manual*, Chapter 11.

2.3.7.2.1 The policy on recount analysis and procedure for the statistical determination of the acceptability of the recount shall be included in the quality manual or SOP. The special considerations for “blind” analysis by a single analyst, in the field, shall be included.

2.3.7.2.2 Records shall be maintained that document the recount analysis of 10% of all samples analyzed by each registered analyst

2.3.7.3 Blank Analysis

Records demonstrating the routine introduction of control samples and blanks shall be maintained. Blank samples shall be analyzed by the same procedure as that used for field samples, in accordance with approved methodology. Blanks shall be supplied by the customer, as representative of the same lot or batch as the field samples.

2.3.7.3.1 The policy on blank analysis shall be included in the quality manual or SOP.

2.3.7.3.2 The analysis of blanks shall be documented by the analyst.

2.3.8 Round-Robin Participation

Organizations shall participate, at least semiannually, in a round-robin airborne fiber counting program with at least two other separate organizations in accordance with the most current edition of the *AIHA Laboratory Quality Assurance Manual*, Chapter 11, and the OSHA 29 CFR 1910.1001 Appendix A.

Participation in the AIHA Proficiency Analytical Testing Programs, LLC Industrial Hygiene Proficiency Analytical Testing (IHPAT) program for asbestos in air or Asbestos Analysts Testing (AAT) proficiency program does not count toward meeting this requirement.

2.3.8.1 Procedures in the quality manual or SOP shall demonstrate how the field analysts participate in the round-robin program.

2.3.8.2 The results of the round-robin shall be evaluated statistically. If there is a discrepancy concerning a sample or samples, a recount shall be conducted to rectify the problem. Corrective action shall be taken whenever round-robin results are outside

acceptance limits.

2.3.8.3 Results from the two latest rounds of round-robin participation with evidence of statistical evaluation of the results shall be submitted with the organization application.

2.3.8.4 Round-robin samples shall be analyzed by the same procedure as that used for field samples, in accordance with approved methodology.

2.3.9 Corrective Action

Organizations or analysts shall take corrective action whenever analytical results are in error, or when quality control data, AAT performance results or round robin results are outside acceptance limits. No data shall be reported until the cause of the problem is determined and corrected or until the organization demonstrates the cause was a random event and no longer affects data. Organizations shall document and keep records of all out-of-control events, the determined cause(s) and corrective actions taken. Organizations shall have a written procedure for handling each customer's quality-related complaints and maintaining records of corrective actions.

2.3.10 Record Keeping

The document and record retention policies of the organization shall be stated.

2.3.10.1 The policies shall include the manner and duration of record retention. All analysts' records shall be maintained for at least three (3) years after termination of employment.

2.3.10.2 Computer records are satisfactory without hard copy files, provided copies can be produced as needed and data edits are documented within the computer files. Computer file backup procedures are required.

2.3.11 Sample Retention and Disposal

The sample storage, retention and disposal policies of the organization shall be stated.

2.3.11.1 The policies shall include the manner and duration of sample retention and disposal.

2.3.11.2 Analysts are expected to follow all federal, state and local regulations regarding environmental contamination and waste disposal.

2.3.12 Internal Systems Audit

Each organization shall conduct and document an annual systems audit. The purpose of the audit is to verify that all actions adhere to the approved quality system and its QA requirements. Deficiencies shall be addressed through corrective action.

2.3.13 Analytical Methods and Field Considerations

Analysts shall follow the method detailed in OSHA 29 CFR 1910.1001 Appendix A and the most current revision of the NIOSH 7400 analytical method of fiber analysis.

2.3.13.1 Name and issue date of the current analytical method used shall be documented or referenced in the quality manual or SOP.

2.3.13.2 On-Site Housekeeping

Housekeeping procedures in the field shall be adequate to prevent contamination of samples and to minimize fire safety hazards and shall be documented.

2.3.13.3 On-Site Filter Mounting

Procedures for mounting filters in the field shall be documented.

2.3.13.4 On-Site Environmental Requirements

Environmental requirements for onsite setup shall be documented.

2.3.14 Final Reporting

The final report shall convey all of the information needed to evaluate the analytical results.

2.3.14.1 The customer report shall include organization and customer identification, report date, sample identification, analytical method reference and analytical results.

2.3.14.2 Each report shall give the recipient some indication of data reliability, including a limit of detection (LOD).

2.3.15 Safety and Health

Analysts are expected to follow all applicable federal, state and local regulations regarding safety and health.

ARTICLE III

REQUIREMENTS AND CONDITIONS FOR AAT PARTICIPATION

The AAT program is the proficiency program for analysts in the AAR program. Performance limits for these test samples are determined by the AIHA Registry Programs. Analysts participating in the AAR are required to analyze AAT program samples on a quarterly basis. It is not possible for analysts to enroll in the AAT program unless they are first enrolled in the AAR program.

3.1 INITIAL ENROLLMENT AND FEES

Analyst and organization (if not approved) applications, with required attachments, shall be completed and received by the AIHA Registry Programs prior to enrollment of an individual analyst in the AAT program. In addition to the application(s), full payment of program fees, as specified on the most recent AIHA AAR Program Fee Schedule, shall be received by the AIHA Registry Programs. The AAT program schedule and the AAR Program Fee Schedule are available on the AIHA Registry Programs [website](#).

3.2 SAMPLE DISTRIBUTION

Once an organization is enrolled in the AAR program, it shall receive the AAT samples for the next scheduled round. Samples are mailed four (4) times a year (the first of March, June, September, and December). The organization is responsible for notifying the AIHA Registry Programs of any changes in the organization status that may affect the receipt of AAT samples/information, such as a change of address or named recipient.

3.3 SAMPLE RECEIPT

Upon receipt of the AAT samples, it is the responsibility of the organization to inspect the shipment for any damage and to ensure that the correct samples were received. If samples are damaged, then the organization shall notify the AIHA Registry Programs within **five (5) business days of receipt** to ensure timely replacement of samples. Organizations requesting special shipping for replacement samples shall assume the cost of express carrier handling.

If the AAT samples are not received by the organization in accordance with the predefined schedule, then it shall be the responsibility of the organization to contact the AIHA Registry Programs within **five (5) business days of the scheduled sample receipt date** to notify them of failure to receive the AAT samples (AAT samples are scheduled to arrive at the organization by March 10, June 10, September 10 and December 10 of each year unless stated otherwise on the [Deadline and Instructions for Asbestos Analysts Testing \(AAT\) Participants](#) document).

The AIHA Registry Programs is not responsible for replacing damaged samples or samples not received by the organization after five (5) business days past the expected receipt date, as posted on the [Deadline and Instructions for Asbestos Analysts Testing \(AAT\) Participants](#) document.

3.4 SAMPLE ANALYSIS

Proficiency samples, such as the AAT samples, shall be analyzed using the same analytical procedures used to test customer samples. Results or analysis of AAT samples shall not be discussed with other organizations or laboratories until the results have been published by the AIHA Registry Programs.

3.5 SUBMISSION OF DATA

The organization shall be responsible for the timely and proper submission of all AAT sample results to the AIHA Registry Programs. The organization shall submit data using the [AAT Data Entry Portal](#). The data shall be entered into the system by the specified deadline. The posted deadline is by 11:59:59 PM eastern time (ET) of the date stated. Data will not be accepted after the scheduled close of an AAT round. Contact the AIHA Registry Programs immediately if any issues arise while entering data.

3.6 OUTLIERS

A result that is outside the statistical control limits determined for an AAT round is classified as an outlier. Any non-participation or non-reporting of AAT data shall be classified as an outlier unless non-participation (see Section 3.9) has been pre-approved by the AIHA Registry Programs. If an organization can document that the results were submitted on time, despite AIHA Registry Programs not having a record of their submittal in the system, then a copy of the AAT Submission Confirmation page or a written request shall be submitted for review. The AIHA Registry Programs shall review the request and decide whether or not to approve the late entry of the results for this reason.

Incorrect reporting of AAT results via the internet will result in up to four (4) outliers as this is considered the same as reporting an inaccurate result. Incorrect reporting may include, but is not limited to: invalid sample ID number(s); invalid fiber counts; invalid or incorrect analyst ID number; invalid or incorrect organization number; or incorrect AAT sample round or batch number.

3.7 PROFICIENCY

Analysts are rated for proficiency in the AAT program dependent on the number of outliers received. An analyst is rated acceptable (proficient) if there are not more than two (2) cumulative outliers reported in the two most current rounds in which the analyst was enrolled and not granted an excused absence (see section 3.9). An analyst shall maintain proficiency if there are not more than two (2) cumulative outliers reported in the two most current rounds. In all cases where proficiency criteria are not met, an analyst shall be rated unacceptable (non-proficient).

3.8 RETESTING

Analysts who have more than two (2) outliers reported in two (2) consecutive rounds should request additional samples for retesting. A fee, determined by the AIHA Registry Programs, will be charged for this service. Analysts submitting retest results will be evaluated on the most recent sample set regardless of previous performance, i.e., the retest round will over-ride your original results for the round.

3.9 NON-PARTICIPATION

3.9.1 Analyst Non-Participation

Non-participation in any AAT round, without prior written approval, will result in four (4) outliers. Applicant or Registered analysts, who fail to participate in two (2) consecutive rounds, unless exempted, will be administratively removed from the AAR Program. Analysts who wish to be exempted from participation in an upcoming round shall do so in writing to the AIHA Registry Programs prior to the close of the round. A letter of exemption confirmation will be sent to the analyst stating that the analyst's results will be recorded as an "E" for the round. However, the analyst will not lose their registered status or the reported outliers will not hold him/her back from gaining registered status, provided the AIHA Registry Programs has reviewed and approved the organization's and the analyst's applications and proficiency has been established. The AIHA Registry Programs letter of exemption confirmation is to be kept with the analyst's records. Exemption is valid for only one AAT round and cannot be granted for two consecutive rounds. An analyst shall request a suspension of their listing if they will consecutively miss more than one AAT round.

3.9.2 Organization Non-Participation

An organization that has no enrolled analysts shall be suspended from the AAR program and removed from the AIHA Registry Programs web list of approved organizations. Suspension shall commence immediately upon the drop of the last registered analyst. The organization will be contacted with the date that the suspension will expire and the organization will be administratively removed if an analyst is not enrolled. An active analyst shall be enrolled before the organization's status can be restored.

3.9.3 Suspension of Analysts / Organizations

If an organization or analyst will be unable to participate in two or more consecutive AAT rounds, they shall request suspension to remain enrolled in the AAR program. Without prior written

consent from AIHA Registry Programs' management, suspensions will be granted for no greater than 2 consecutive AAT rounds. If the organization or analyst is unable to participate by the end of the requested suspension, administrative removal will occur and reapplication will be required to reinstate the analyst in the AAR. Analysts, who miss two or more consecutive AAT rounds, will have to regain proficiency status in the AAT program before their registration status is reinstated.

3.10 AAT PERFORMANCE RESULTS REPORT

The AIHA Registry Programs shall post the AAT Performance Results reports to the [AAT Data Entry Portal](#) for each participating organization within ten (10) business days of the close of the round. It is the responsibility of the organization to contact the AIHA Registry Programs if any errors are found on their report.

3.11 PRACTICE ROUNDS

An organization may purchase AIHA Proficiency Analytical Testing Programs, LLC PT stock samples or AAT samples from previous rounds for practice, as available. These data shall not be used to document proficiency in any AIHA affiliate laboratory program. Practice rounds may also be used to document quality control, with respect to new analyst training and method validation procedures. Rounds are sold on a first-come first-served basis.

3.12 ADDITIONAL REQUIREMENTS AND CONDITIONS FOR AAT PARTICIPATION FOR AN EXPEDITED ANALYST APPLICATION

Analysts seeking an expedited AAR registration through an expedited application process and AAT proficiency demonstration are subject to all requirements outlined in this article regarding their AAT participation with the following exceptions for the first AAT round and retest round with their affiliated organization.

3.12.1 Initial Enrollment and Fees

The retest round fees are due upon submission of the expedited application with the other applicable application fees. Additional fees will be charged for expedited analyst applications. Refunds will not be given for the additional fees associated with the expedited application, if the analyst does not gain proficiency in the expedited rounds.

3.12.2 Proficiency

Expedited analysts will participate in the regular round and the retest round of the first round/retest round of AAT participation with their affiliated organization. Their proficiency status will be determined by the results from these two rounds. If the analyst does not gain proficiency in the two expedited rounds (regular and retest), their expedited status will be revoked and they shall gain proficiency through the process outlined in section 3.7.

3.12.3 Retesting

The retest round will be shipped to the organization without the requirement of a retest order form. The retest round will be used as the second round to determine proficiency. The results from the retest round will not override the results of the original round, but count as the second round needed to gain proficiency. There will be no option to retest the expedited participation for the regular round or the retest round through the procedure outlined in section 3.8.

ARTICLE IV

AAR ORGANIZATION AND ANALYST REGISTRATION PROCESS

4.1 INITIAL ORGANIZATION REGISTRATION

For an organization to qualify for initial registration on the AAR it shall successfully complete the application process and requirements as summarized in the following steps. A flow chart outlining this process can be found in Appendix B.

4.1.1 Full payment of AAR/AAT program fees, as specified on the most recent AIHA AAR Program Fee Schedule, shall be received by the AIHA Registry Programs.

4.1.2 The organization application shall be completed and submitted to the AIHA Registry Programs. The AIHA Registry Programs staff reviewer shall review the application for completeness within ten (10) business days.

4.1.3 The organization will be granted twenty (20) business days to respond to any deficiencies found during the completeness review.

4.1.4 Steps 4.1.2 and 4.1.3 will be repeated a maximum of two iterations. If the application is not complete at this time, the application process will be halted and the organization will have to wait six (6) months before reapplying for listing.

4.1.5 The complete organization application will be placed in queue for the next available SME to perform a technical review.

4.1.6 The completed application shall undergo a technical review within twenty (20) business days of receipt by a qualified SME.

4.1.7 The organization will be granted twenty (20) business days to respond to any deficiencies found during the technical review.

4.1.8 Steps 4.1.6 and 4.1.7 will be repeated a maximum of two iterations. If the application is not complete at this time, the application process will be halted and the organization will have to wait six (6) months before reapplying for listing.

4.1.9 Before any of the organization's analysts may qualify for listing on the AAR, the organization shall successfully complete the approval process.

4.1.10 Ten (10) percent of applications will be subject to a quality audit by a SME before approval notification (this audit will be performed by a different SME than referenced in 4.1.5 and 4.1.6), as outlined in section 4.4. The SME shall complete the quality audit review within ten (10) business days.

4.1.11 The approved organization will be added to the AIHA Registry Programs web list of [AAR Registered Organizations](#) within ten (10) business days of approval.

4.2 ANALYST REGISTRATION

For an analyst to qualify for or maintain Registered status on the AAR he/she shall successfully complete the application process as summarized in the following steps. A flow chart outlining this process can be found in Appendix C. The application process is the same for initial analysts, Registered Analysts transferring to a new organization or for analysts seeking reinstatement of their registered status.

4.2.1 Full payment of AAR/AAT program fees, as specified on the most recent the AIHA AAR Program Fee Schedule, shall be received by the AIHA Registry Programs before the analyst will be enrolled. Analyst applications are subject to the annual fee, enrollment fee and AAT sample fees, if required by total number of analysts enrolled with organization.

4.2.2 The analyst applying for registration or reinstatement of their registered status shall be affiliated with an approved organization and shall be trained in and comply with this organization's quality system as defined in Article II.

4.2.3 The analyst shall complete Forms 8, 9, and 10 of the AAR application and submit them to the AIHA Registry Programs with the associated quality control documentation outlined on Form 9. For reinstatements, this documentation must demonstrate the analyst's quality system training and quality control work with their current affiliated organization. The AIHA Registry Programs staff reviewer shall review the application for completeness within ten (10) business days.

4.2.4 The analyst will be granted twenty (20) business days to respond to any deficiencies found during the completeness review.

4.2.5 Steps 4.2.3 and 4.2.4 will be repeated a maximum of two iterations. If the application is not complete at this time, the application process will be halted and the analyst will have to wait six (6) months before reapplying.

4.2.6 The complete analyst application will be placed in queue for the next available AIHA Registry Programs Staff Reviewer to perform a technical review.

4.2.7 The completed application shall be reviewed by the AIHA Registry Programs Staff Reviewer within twenty (20) business days of receipt.

4.2.8 The analyst will be granted twenty (20) business days to respond to any deficiencies found during the technical review.

4.2.9 Steps 4.2.7 and 4.2.8 will be repeated a maximum of two iterations. If the application is not complete at this time, the application process will be halted and the analyst will have to wait six (6) months before reapplying for listing.

4.2.10 AIHA Registry Programs Staff Review must approve the application before the analyst can gain registered status, have their registered status reinstated or maintain their registered status after a transfer.

4.2.11 The analyst shall successfully participate in the AAT program (see Article III) by participating in the two (2) most current and consecutive rounds receiving no more than two (2) outliers, thereby, meeting established proficiency standards for the AAT program. Analysts who maintain their AAT proficiency during a transfer only need to complete the application process.

4.2.12 Ten (10) percent of applications will be subject to a quality audit by a SME before approval notification, as outlined in section 4.4. The SME shall complete the quality audit review within ten (10) business days.

4.2.13 After the analyst application has been approved and proficiency has been achieved, as defined in Article III, Section 3.7, the analyst is granted registered status or their registered status is reinstated.

4.2.14 An analyst who gains registered status or has their registered status reinstated will be listed on the registry web list of Registered Analysts within ten (10) business days of the posting of the AAT Performance Results Report for the round in which the analyst gains proficiency or the application is approved, as applicable.

4.2.15 If the analyst is transferring to an approved organization, without missing a round of AAT participation, and has maintained proficiency, then the analyst will be added to their new organization's listing on the AIHA Registry Programs web list of Registered Analysts during the

next web list update and their registered status will be maintained. If the analyst is transferring to an organization applying for initial registration, their registration status is suspended and they cannot be listed until the organization's application has been approved.

4.2.16 If the analyst is seeking reinstatement in the AAR, but is not currently registered, then the analyst shall need to demonstrate proficiency in the AAT program. The analyst may have lost registered status by missing an AAT round or may have never acquired registered status. Proficiency in the AAT program is gained through participation in the two (2) most current and consecutive rounds with no more than two (2) outliers, thereby, meeting established proficiency standards for the AAT program (Article III). After proficiency has been achieved, as defined in Article III, Section 3.7, the analyst will be listed as a Registered Analyst on the AIHA Registry Programs [website](#). Listing will be delayed until after organization approval, if the analyst has transferred to an organization applying for initial registration that has yet to be approved.

4.3 REGISTRATION PROCESS

Flow charts outlining the registration processes for an organization and its affiliated analysts are included as Appendix B, C, and D. Specific requirements to supplement these flow charts are listed below:

4.3.1 The registration process shall be completed within twelve (12) months from the date of receipt by the AIHA Registry Programs of any AAR application. An organization or analyst that fails to complete all of these requirements for registration or maintenance of registration within this specified time period of application approval will have its application administratively removed from consideration by the AIHA Registry Programs. The organization and/or its analysts will also be administratively removed from the AAR program. Once notified of the removal of its application, the organization or analyst shall wait six (6) months before reapplying for registration. If the initial application is removed from consideration by the AIHA Registry Programs, then the organization and affiliated analyst(s) shall have a right to appeal this decision to deny registration (refer to Articles V and VI).

4.3.2 An organization or analyst may request, in writing, an extension of time to complete all requirements for registration from the AIHA Registry Programs. Extensions are granted in twenty (20) business day increments up to forty (40) business days. The application process will be halted and the organization or its analysts will be administratively removed from the AAR program, if the application is not completed by the end of the extension period.

4.3.3 Organization and analyst applications shall be submitted, in duplicate, to the AIHA Registry Programs. Applications may be obtained from the AIHA Registry Programs [website](#) or by contacting the AIHA Registry Programs staff. For initial organizations, the AIHA Registry Programs will process the organization application before the analyst application(s) can be reviewed (see Appendix B). If the organization application has been approved, the affiliated analyst application(s) shall be processed (see Appendix C).

4.3.4 Any return of materials to the submitting organization and/or analyst shall be documented and copies of the returned materials maintained in the AIHA Registry Programs records.

4.3.5 If the process is halted for reasons identified in this Article, then the organization and/or analyst will be required to submit another application and pay application fees again. There shall be no refund of application fees. The organization and/or analyst will forfeit all application fees if the process is halted. The organization and/or analysts will have to wait six (6) months to reapply.

4.3.6 For an organization and/or analyst application (initial organization, triennial organization, and initial, reinstatement or transfer analyst), the AIHA Registry Programs shall have ten (10) business days to complete the initial review of the application. The scope of this review shall minimally include an application completeness check.

4.3.7 For an organization application technical review, a qualified SME shall have twenty (20)

business days, from the time of receipt of application from the AIHA Registry Programs, to complete their review of the organization application and provide a formal request for additional information (if necessary) to the AIHA Registry Programs for further action.

4.3.8 For an analyst application technical review, the AIHA Registry Programs Staff Reviewer shall have twenty (20) business days, from the time of receipt of application from the AIHA Registry Programs, to complete their review of the analyst application and provide a formal request for additional information (if necessary) to the organization and/or analyst for further action

4.3.9 A qualified SME shall approve or disapprove an organization application. The AIHA Registry Programs Staff Reviewer shall approve or disapprove an analyst application.

4.3.10 Selection of an AAR application for a quality audit review by a SME shall be determined at the beginning of the process and shall be based upon pre-defined selection criteria. SME quality audit reviews shall be performed on a 10% frequency for all AAR application reviews unless otherwise directed by the SME pursuant to written policy. For organization applications, the quality audit will be performed by a different SME than the one who performed the technical review.

4.3.11 The scope of the SME quality audit review shall cover the review process from receipt of the application to the final recommendation by the SME or the AIHA Registry Programs Staff Reviewer and shall include a determination of conformance to policy, timelines and technical requirements.

4.3.12 The SME shall complete the quality audit review within ten (10) business days.

4.3.13 The AIHA Registry Programs registry of AAR Registered Organizations and Registered Analysts will be updated within ten (10) business days of the approval of the organization application or the date that the results post for the AAT round in which the analyst gains proficiency.

4.4 REGISTRATION PROCESS: ADDITIONAL CONSIDERATIONS FOR AN EXPEDITED ANALYST APPLICATION

An analyst seeking registration or registration reinstatement with an approved organization can request expedited registration. This expedited registration is subject to all requirements outlined in this article regarding the application approval process with the following exceptions.

4.4.1 Analysts enrolling with an initial organization or an organization that has not yet been approved cannot seek expedited registration.

4.4.2 The analyst application shall be submitted by the enrollment date of their expected first round of AAT participation.

4.4.3 The expedited application process will only give **ten (10) business days** to respond to any deficiencies found in the completeness review or the technical review.

4.4.4 Extensions granted for any request for additional information from the completeness review or the technical review will be granted only once and will only give ten (10) additional business days.

4.4.5 The analyst application approval process shall be completed by the close of the retest round of the analyst's first round of AAT participation.

4.4.6 The analyst shall lose their expedited status and shall complete the listing process as any analyst would, if any of the following occur. The fees associated with the expedited listing process will not be refunded.

4.4.6.1 The analyst application is not complete by the close of the retest round of the first round of AAT participation by the analyst.

4.4.6.2 The analyst application is not approved by the close of the retest round of the first round of AAT participation by the analyst.

4.4.6.3 The analyst has not gained proficiency in the AAT program during their first AAT round and retest round with their affiliated organization.

4.5 MAINTENANCE OF LISTING

Failure to comply with these requirements will result in suspension and possible removal from the program. Suspension will result in the temporary removal of the organization and/or its affiliated analysts' names, as appropriate, from the registry. Analysts who have been temporarily removed from the AIHA Registry Programs web list of registered analysts due to AAT non-proficiency, may regain listing by retesting or completing the two (2) most current, consecutive rounds with no more than two (2) outliers.

4.5.1 Analysts

An analyst's registration shall be maintained by continued compliance with AAR requirements, proficiency in the AAT program, and payment of appropriate AAR fees. Current quality control documentation for each registered analyst will be included in the organization's triennial application. To transfer to another organization, an analyst shall submit an analyst application that provides updated information for their new affiliation as required by the AIHA Registry Programs. To maintain their Registered Analyst status, an analyst shall transfer to another approved organization, without missing an AAT round or otherwise losing their proficiency status.

4.5.2 Reporting of Significant Changes Within an Organization

The organization shall notify the AIHA Registry Programs in writing of changes in ownership, personnel, quality system, or other matters directly impacting the organization's quality and ability to meet the policy requirements within twenty (20) business days of the change.

4.5.3 Triennial Renewal

Once every three (3) years, the organization will receive a request from the AIHA Registry Programs to submit an application that provides updated and current organization and analyst information. This application shall be completed and returned to the AIHA Registry Programs within forty (40) business days. The updated application shall be reviewed following the applicable steps of the organization listing process (section 4.4), as shown in Appendix B, to ensure that training, quality control, record keeping, methods, and equipment are current. An organization's failure to provide a completed application to the AIHA Registry Programs within the required time frame shall result in removal of the organization and/or its affiliated analysts' names, as appropriate, from the AIHA Registry Programs registry of AAR Registered Organizations or Registered Analysts.

4.6 MAINTENANCE OF ASSOCIATED FEES

If the organization fails to pay the AIHA Registry Programs-associated fees assessed by the AIHA Registry Programs that are specified in the most recent AAR Program Fee Schedule, the AIHA Registry Programs will temporarily remove (suspend) the organization and/or its affiliated analyst names from the AIHA Registry Programs web list of approved organizations or registered analysts and hold all AAT samples and reports until required fees are paid in full. The AIHA Registry Programs will notify the organization of this action in writing, specifying a payment deadline. If payment is not received by the AIHA Registry Programs within the specified time frame and a written request from the organization to extend the payment deadline has not been received and approved by the AIHA Registry Programs, then AIHA Registry Programs shall administratively remove the organization and analysts from the program. There is no option available to appeal administrative removal due to non-payment of program fees.

ARTICLE V

SUSPENSION, REMOVAL AND DENIAL OF REGISTRATION

5.1 GROUNDS

The AIHA Registry Programs may suspend, remove, or deny an organization or analyst registration on the AAR if any of the following circumstances apply:

- 5.1.1** The organization and/or analyst fail to comply with any of the requirements of the AAR Program.
- 5.1.2** The organization is no longer in the business of conducting fiber-counting analysis.
- 5.1.3** The organization fails to submit an updated application as part of the triennial renewal process within the required time frame.
- 5.1.4** The organization and/or analyst fail to respond to a written request for information within the required time frame.
- 5.1.5** The organization fails to notify the AIHA Registry Programs of changes in ownership, personnel, quality system, or other matters directly impacting quality within the required time frame.
- 5.1.6** The analyst fails to maintain AAT proficiency as defined in Article III.
- 5.1.7** The organization or analyst does not participate in two (2) consecutive AAT rounds without prior exemption as defined in Article III.
- 5.1.8** The analyst submits, as his/her own, results for AAT proficiency samples that were analyzed by another analyst.
- 5.1.9** The analyst misrepresents his/her affiliation with an organization to the AIHA Registry Programs or uses their AAR status in a misleading manner.
- 5.1.10** The organization and/or analyst misrepresent material information in an initial or triennial application, or in any written correspondence with the AIHA Registry Programs.
- 5.1.11** The organization (or its owner(s)) or any of its affiliated analysts have been convicted of a violation of federal/state statutes related to the work performed under the Asbestos Analysts Registry Program.
- 5.1.12** The organization and/or its affiliated analysts knowingly report fraudulent or erroneous data.
- 5.1.13** The organization and/or its affiliated analysts misrepresent its analysts' registration status and/or their participation in the AAT program through false or misleading advertising or communication (written or verbal) or in any other form.
- 5.1.14** The analyst uses his/her AAR registration in any manner that brings disrepute to the organization.

5.2 SUSPENSION

Suspension is a temporary removal of the organization's or analyst's AAR registered status when the organization or analyst is determined to be out of compliance with specific program requirements. Suspension may occur at any time for cause. Reasons for suspension include, but are not limited to, those outlined in Section 5.1. Conditions for suspension include:

5.2.1 Suspension may be initiated upon the recommendation of the SME group or the AIHA Registry Programs management. A finite period of time for the suspension shall be clearly defined.

5.2.2 An analyst's registered status shall be immediately suspended upon notification of the initiation of the removal process.

5.2.3 An organization may submit a request to the AIHA Registry Programs to voluntarily suspend the registration of the organization and/or its affiliated analyst(s) for a predetermined period of time.

5.2.4 The AIHA Registry Programs shall notify the analyst and his/her organization by certified mail, return receipt requested, of the reasons for and conditions of the suspension, the action required for reinstatement, and the deadline for satisfactorily completing the action.

5.2.5 During the suspension period, the organization and/or analyst may not advertise the organization or analysts' AAR registration.

5.2.7 Suspension shall proceed to removal if the actions required for reinstatement are not met by the deadline.

5.2.8 The AIHA Registry Programs shall notify the organization and the analyst, in writing, of any action (reinstatement or removal) at the conclusion of the suspension period.

5.3 REMOVAL PROCESS

The AIHA Registry Programs staff shall continuously monitor the application and renewal process, performance in the AAT program, and information from organization customers, to identify situations of nonconformance. If AIHA Registry Programs staff determines that grounds for removal (see Section 5.1) are observed. A flow chart outlining the removal process is included as in Appendix E. Specific requirements to supplement this flow chart are listed below.

5.3.1 All communication to the organization regarding removal actions shall be in writing and be sent to the organization by an appropriate documented delivery process. The letter shall clearly state the grounds for removal and the required date of response.

5.3.2 If the due date of the response lapses without any response from the organization, the AIHA Registry Programs shall send a letter using a documented delivery process to the organization and analyst informing those parties of the removal of the organization's and/or analyst's registration from the program and offer the organization and analyst the right to appeal the decision for any removal grounds that are not administrative (AAT non-participation, non-payment of fees and failure to respond to written request for application or additional information). The organization will have ten (10) business days to provide AIHA Registry Programs with a written request to appeal. The organization shall also be informed of its monetary responsibilities shall it choose to appeal.

5.3.3 Absent an appeals request, the removal action is final.

5.4 PROCESS FOR DENIAL OF REGISTRATION

If an organization or analyst fails to meet the requirements of the AAR program, fails to complete the application and review process, or meets any of the grounds for denial of listing, the AIHA Registry Programs may deny registration to the organization and/or analyst. The process for denial of listing is identical to the process for removal as detailed in Section 5.3.

ARTICLE VI APPEALS PROCESS

6.1 RIGHT TO APPEAL

An organization has the right to appeal the decision of the AIHA Registry Programs to deny or remove the organization's listing or their affiliated analysts' registration in the AAR program. If the organization chooses to appeal, it shall be responsible for some costs of the process. If the denial or removal of the organization's listing or their affiliated analyst's registration is overturned, all costs for the appeal are split equally with AIHA Registry Programs. If the denial or removal of the organization's listing or their affiliated analyst's registration is upheld, the AIHA Registry Programs shall pay fifty (50) percent of the transcription costs and the organization shall pay all remaining costs incurred. Organizations seeking initial registration of the organization or of their affiliated analyst(s) shall bear the total cost of the transcription record. The expenses of any witnesses for either party shall be paid by the party producing such witnesses. All other expenses shall be borne by the party incurring those expenses. A flow chart outlining the appeals process is included as Appendix F. Specific requirements to supplement this flow chart are listed below.

6.2 NOTICE OF APPEAL

If the organization wishes to appeal the removal decision, it shall notify the AIHA Registry Programs in writing within ten (10) business days of the date of receipt of the letter from the AIHA Registry Programs outlining its decision to remove or deny an organization's listing or analyst's registration in the AAR program. The response shall include the reason for the appeal and a statement accepting responsibility for monetary expenses as described above. Failure to respond will result in termination of the approval status of the organization or the registration status of the analyst and the listing of either on the AAR.

6.2.1 If the organization notifies the AIHA Registry Programs within ten (10) business days of its desire to appeal the removal decision, the AIHA Registry Programs management shall convene an Appeals Panel within five (5) business days.

6.3 APPEALS PANEL

The panel shall consist of at least three (3) uninvolved persons (persons not directly involved with the removal/denial decision or a direct competitor of the organization), two (2) of whom shall have experience in the AAR program.

6.4 APPEALS HEARING

6.4.1 Site of Hearing. The appeals panel shall designate a time and place for the hearing that does not represent an undue burden for the organization or required participants. The time shall be no later than forty (40) business days after the formation of the appeals panel. The hearing shall commence at that time unless the panel grants a continuance for good cause shown by the party requesting the continuance. The AIHA Registry Programs shall provide written notice to the organization and its affiliated analyst(s) of the time and place of the hearing, an opportunity to examine evidence submitted in this adverse action and to present evidence on behalf of the organization and/or its affiliated analyst(s).

6.4.2 Representation by Counsel. Counsel at the hearing may represent each party, at its own cost.

6.4.3 Stenographic Record. A stenographic record shall be made of the hearing.

6.4.4 Attendance at Hearing. In the event the organization fails to attend the hearing without good cause, the organization and its affiliated analyst(s) shall be deemed to have waived its rights of appeal and the appeals panel shall recommend to the AIHA Registry Programs that the adverse action be affirmed.

6.4.5 Parties. The parties of the hearing shall be the organization and the Appeals Panel. The Appeals Panel may be assisted in the presentation of its case by a staff representative of the AIHA Registry Programs. Either party may choose to have witnesses; however, the appeals panel may require the exclusion of witnesses during presentation of evidence.

6.4.6 Order of Proceedings. The appeals hearing shall proceed as follows:

6.4.6.1 The hearing shall be opened by a representative of the appeals panel, who shall note the time, place and date, the presence and identity of the members of the appeals panel, the organization, and witnesses to the hearing.

6.4.6.2 At the commencement of the hearing, the appeals panel representative shall offer each party an opportunity to make an opening statement to clarify the issues involved.

6.4.6.3 The appellant organization and the appeals panel shall each present its case. Any documentation or presentations by witnesses may be subject to review and questions by the other parties to the appeal.

6.4.6.4 The appeals panel representative shall have the discretion to vary this procedure but shall provide full and equal opportunity to each party for the presentation of all materials or relevant facts.

6.4.6.5 Information offered by any party may be received as evidence by the appeals panel representative.

6.4.6.6 The names and addresses of all witnesses and the identification of each exhibit in the order received shall be made a part of the record, which shall be maintained by the appeals panel representative.

6.4.6.7 On conclusion of the presentation of evidence, the appeals panel representative shall permit each party an opportunity to make a brief closing statement.

6.4.7 Evidence. The parties to the hearing may offer any evidence that is material, relevant and bears on the issues before the appeals panel. The appeals panel will give weight to the evidence presented as they see appropriate. In addition to the evidence taken in the presence of the hearing tribunal, a party may, subject to the approval of the appeals panel representative, submit evidence of witnesses by affidavit. The appeals panel shall give such weight to affidavits, as it deems appropriate, after considering any objections made to the admission of such affidavits. The proponent of an issue or proposition has the burden of proof on the matter.

6.4.8 Adjournment. The appeals panel representative, for good cause, may adjourn the hearing upon request or upon his/her own initiative, subject to reconvening at a specified future date.

6.4.9 Closing the Appeals Hearing. The appeals panel representative shall declare the hearing closed at the conclusion of closing statements or at a later date if he/she decides to permit the parties to file briefs or other documents subsequent to the hearing.

6.4.10 Reopening the Appeals Hearing. The appeals panel representative may reopen the hearing, for good cause, upon application by any party thereto or upon his/her own initiative.

6.4.11 Report of the Appeals Panel. The appeals panel shall render a final written report, approved by a majority of the members of the appeals panel, no later than twenty (20) business days after the close of the hearing. The appeals panel representative shall submit a copy of the report to the AIHA Registry Programs' management, and to all participants of the appeals hearing. Such report shall include the appeals panel findings, conclusions and recommendation concerning the action that had been the subject of the appeal. The appeals panel shall recommend that the adverse action be affirmed unless it determines such adverse action was arbitrary, capricious, an abuse of discretion, not in accordance with the required procedures, or not based upon substantial evidence.

6.5 FINAL DECISION

The Appeals Panel shall possess exclusive authority to render a final decision in any matter appealed in

accordance with this appeal procedure. Within forty (40) business days of issuance of the report of the appeals panel shall give written notice of its final decision to all parties to the appeal hearing.

If the Appeals Panel renders a decision to uphold the removal or denial of AAR organization or analyst registration, the AIHA Registry Programs staff shall:

6.5.1 Inform the AIHA Registry Programs management of the panel's decision.

6.5.2 Inform the organization and its affiliated analyst(s) of the panel's decision.

6.5.3 Remove the organization and/or its analyst(s)' name from all official AIHA Registry Programs listings within five (5) business days of the panel's decision.

If the Appeals Panel renders a decision to deny removal or grant listing, the AIHA Registry Programs staff shall:

6.5.4 Inform the AIHA Registry Programs management of the decision.

6.5.5 Inform the organization and its affiliated analyst(s) of the panel's decision and issue written confirmation of reinstatement of listing on the registry, if applicable.

6.5.6 Reinstate registration status and add the organization and or its analyst(s)' name to the registry.

ARTICLE VII ADVERTISING

7.1 ADVERTISING POLICY

All AAR Registered Organizations and Registered Analysts are encouraged to advertise their listing on the AAR by using the prescribed language defined in this article. Failure to conform to these advertising policies shall result in suspension or revocation of approval status and possible legal actions.

7.1.1 Advertising Wording

An organization or analyst may not advertise that it is AAR listed until it has actually received official notification that it is registered.

7.1.1.1 Organizations

Registered Organization that is listed on the Asbestos Analysts Registry may use the following terms in advertising:

"ABC Organization is a listed Asbestos Analysts Registry Registered Organization."

"ABC Organization is registered by the AIHA Registry Programs® on the Asbestos Analysts Registry."

7.1.1.2 Organization With Multiple Locations

Organizations with multiple locations shall clearly identify the location of the AAR approved organization(s):

"ABC Organization (specific location) is an Asbestos Analysts Registry Registered organization."

"ABC Organization (all locations) is registered by the AIHA Registry Programs® on the Asbestos Analysts Registry."

7.1.1.3 Registered Analysts

A Registered Analyst included on the Asbestos Analysts Registry Registered Analyst web list may use the following terms in advertising on his/her data reports:

"Analyst Name is a Registered Analyst on the Asbestos Analysts Registry with ABC organization."

"Analyst Name is listed as a Registered Analyst by the AIHA Registry Programs® in the Asbestos Analysts Registry program with ABC organization."

7.1.2 Suspended Organizations or Analysts

Organizations or analysts registered by AIHA Registry Programs, but under suspension, may not advertise that they are registered in the Asbestos Analysts Registry program or listed on the registry. Any analyst that loses registered status shall remove any advertising from their data sheets.

7.2 VARIATION IN ADVERTISING

Any other use of these terms or any variation in terminology requires prior AIHA Registry Programs approval. The AAR is not an accreditation program or a certification program. When advertising organization approval or analyst registration, the words accreditation or certification, or variations thereof, shall not be used.

ARTICLE VIII MISCELLANEOUS

8.1 INDEMNITY

The AIHA Registry Programs® shall indemnify and hold harmless its directors, officers, employees, agents and volunteers, members of the Subject Matter Expert group, and all other representatives of the AIHA Affiliate Laboratory Programs, their heirs and legal representatives from any and all claims for loss, liability or damage, including costs, fees and expenses that arise out of or in connection with the acts or omissions of such person committed in the performance of the registry program activities provided that such person acted in good faith and in a manner he or she reasonably believed to be in or not opposed to the best interests of AIHA Registry Programs®.

8.2 REPRESENTATION OF REGISTRATION

See Article VII-Advertising

8.3 LIST OF AIHA REGISTRY PROGRAMS REGISTERED ORGANIZATIONS AND REGISTERED ANALYSTS

The AIHA Registry Programs maintains a list of Registered Organizations and Registered Analysts on the AIHA Registry Programs website. If an organization is suspended or revoked, the organization and its analysts will be removed from the web list. An analyst who is suspended, who is dropped, or who loses proficiency, will be removed from the web list.

8.4 CONFIDENTIALITY OF RECORDS

Files and records of the AAR shall be confidential and their use restricted to personnel engaged in administration of the AIHA Registry Programs.

8.5 CONFLICTS OF INTEREST

The AIHA Registry Programs requires that all members of the SME group or other agents of the AIHA Registry Programs involved in the AIHA Registry Programs sign a Conflict of Interest statement that prohibits these individuals from participating in any activities and/or proceedings to approve, deny or revoke the registry listing of any organization and its affiliated analysts where such person has a vested interest in the approval or denial of registry listing.

8.6 FEES

The fees associated with the AAR program shall be determined by the AIHA Registry Programs. The AAR Program Fee Schedule shall include all appropriate fees for the AAR program. The current AAR Program Fee Schedule shall be maintained on the AIHA Registry Programs web site.

8.7 FEEDBACK FROM PARTICIPATING ORGANIZATIONS/ANALYSTS

Participating organizations desiring changes in the AIHA Registry Programs policies or programs shall detail their suggestion(s) in writing to the AIHA Registry Programs. The AIHA Registry Programs Manager shall inform the AIHA Registry Programs' management and SME group of the suggestion(s). The AIHA Registry Programs shall consider and respond to the organization suggestion(s), as appropriate.

8.8 COMPLAINTS

Organization users and others desiring to file a complaint against an organization and/or its affiliated analysts as a result of performance or misrepresentation, or a complaint concerning other AIHA Registry Programs issues, may do so in writing to the AIHA Registry Programs. The AIHA Registry Programs Manager shall inform the AIHA Registry Programs' management and SME group of the complaint. The AIHA Registry Programs shall take corrective actions, as appropriate, and respond to the complainant in a reasonable amount of time.

ARTICLE IX APPENDICIES

APPENDIX A: ABBREVIATIONS AND TERMS

The following abbreviations and terms will be helpful in interpreting this policy document and the AAR Application.

ABBREVIATIONS

Abbreviation	Definition
AAR	Asbestos Analysts Registry
AAT	Asbestos Analysts Testing
AIHA	American Industrial Hygiene Association
COC	Chain of Custody
CV	Coefficient of Variation (synonymous with Relative Standard Deviation)
ET	Eastern Time zone
IHPAT	Industrial Hygiene Proficiency Analytical Testing
LCL	Lower Control Limit
LOD	Limit of Detection
NIOSH	National Institute for Occupational Safety and Health
OSHA	Occupational Safety and Health Administration
PAT	Proficiency Analytical Testing
PT	Proficiency Testing
QA	Quality Assurance
QC	Quality Control
QM	Quality Manual
S	Standard deviation
SME	Subject Matter Expert
SOP	Standard Operating Procedure
S _r	Relative Standard Deviation (synonymous with Coefficient of Variation)
TAP	Technical Advisory Panel
UCL	Upper Control Limit

TERMS

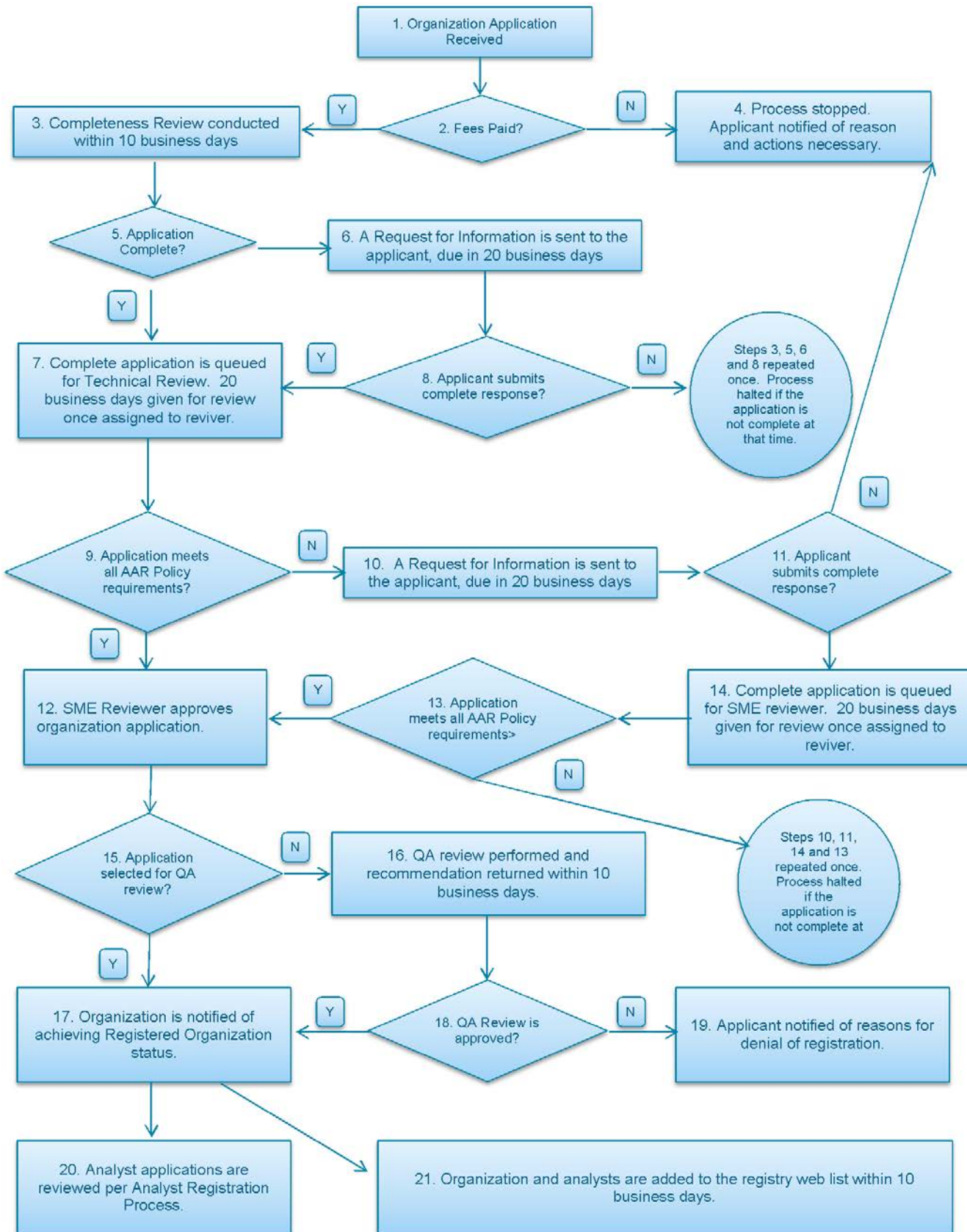
Term	Definition
AIHA Affiliate Laboratory Programs	General term referring to any program within the AIHA Registry Programs [®] , AIHA Proficiency Analytical Testing Programs or AIHA Laboratory Accreditation Program, LLC established to maintain the highest possible standards of performance for analysts and/or laboratories analyzing samples and evaluating exposures to hazardous agents.
AAT Proficiency	Proficiency in the AAT program is defined as no more than two (2) outliers in two (2) consecutive rounds of the AAT program.
AAT Submission Confirmation	A page that displays upon submission of AAT results on the AAT Data Entry Portal . Shall be printed and kept as a record of results submission.
Acceptance Limits	Established mathematical data quality limits for analytical method performance.
Accuracy	The degree of agreement between an observed value and an accepted reference value. Accuracy includes a combination of precision and bias. See Precision and Bias .

Term	Definition
Affiliated Analyst	An analyst that is to be registered with an organization who follows that organization's quality system.
Analysis	The qualitative or quantitative determination of a property or analyte in a substance or material.
Applicant Analyst	An analyst that has applied for registration or reinstatement of their registration, but has not yet met all of the requirements for registration or reinstatement of their registration.
Asbestos Analysts Registry	A registry program offered by AIHA Registry Programs for recognition of analysts who perform fiber counting generally outside of established laboratory locations, who follow an approved Quality System and quality control practices strictly based on the NIOSH 7400 Method and regularly demonstrate competency through proficient performance in the Asbestos Analysts Testing program.
Asbestos Analysts Testing	A competency assessment proficiency testing program for fiber-counting analysts who desire to be registered in the AAR.
Batch	A group of samples that are processed in one operation: considered to be a uniform, discrete unit.
Bias	A systematic error manifested as a consistent positive or negative deviation from the known true value.
Calibration	A set of operations which establish, under specified conditions, the relationship between values indicated by a measuring instrument or system, or values represented by a material measure, and the corresponding known values of a standard
Chain of Custody	Definitive evidence (a record) of the persons who had possession or custody of the sample(s) for all periods of time, as it moved from the point of collection to the final analytical result.
Customer	Any person or organization that engages the services of an organization or its affiliated analysts.
Control Chart	A means to identify the degree to which a measured value disagrees with an accepted reference value.
Corrective Action	All activities taken, whether unsuccessful or not, to eliminate the cause(s) of an existing nonconformity or deficiency in order to prevent recurrence. See <u>Deficiency</u> .
Current Analyst Status	Current status of an analyst in your organization. Provides information that would clarify this analyst's position and work load. For example, full time registered, probationary analyst in application process, or back up PCM analyst.
Deficiency	A failure to comply with a requirement of the AIHA Registry Programs AAR Program or an organization's own stated quality system requirements.
Deviation	A departure from written procedures, test methods, contracts or any other standard operating procedure that is part of the laboratory's Quality Assurance System.
Duplicate Samples	Two samples taken from and representative of the same population and carried through all steps of the sampling and analytical procedures in an identical manner. Duplicate samples are used to assess variance of the total method including sampling and analysis.
Enrollment date	The date by which an analyst or organization application shall be received to be included in that AAT round. Dates are listed in the AAR Program Fee Schedule and on the <i>Deadlines and Instructions for Asbestos Analysts Testing (AAT) Participants</i> document posted on the website .
Equipment	All physical items (including software and instruments) in the facility used in the performance of analytical testing.

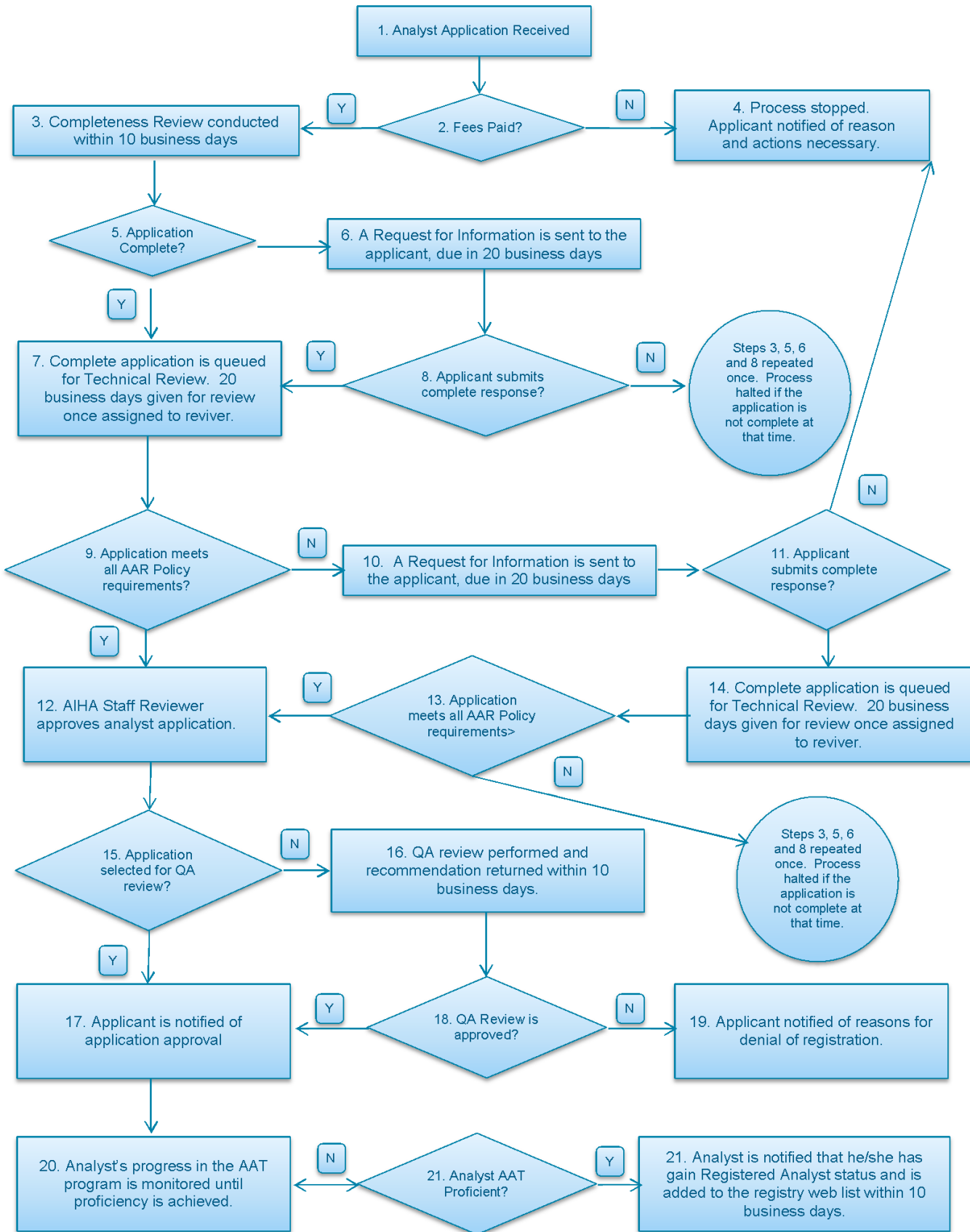
Term	Definition
Equipment Log	A chronological record of preventive and emergency maintenance performed on any equipment. The logs include a record of calls, service technician summaries, records of calibration by the manufacturer, routine user maintenance, and other information as required by these policies.
Expedited Analyst	An initial or transfer analyst seeking an accelerated proficiency determination in the AAT program and enrollment and registration process to the AAR.
Field Blank	An analyte-free matrix carried to the sampling site, exposed to the sampling conditions (e.g., bottle caps removed), returned to the laboratory, treated as a sample, and carried through all steps of the analysis. For example, a clean culture media plate, sorbent tube, or a clean filter could be used as a field blank. The field blank, which shall be treated just like the sample, evaluates possible effects attributable to shipping and field handling procedures.
Initial Analyst	An analyst who is applying to the AAR for the first time.
Initial Organization	An organization who is applying to the AAR for the first time. May also be an organization that previously dropped or was dropped from the AAR program and is reapplying after the appropriate waiting period.
Industrial Hygiene Proficiency Analytical Testing	A proficiency testing program involving industrial hygiene samples of various analytes and matrices analyzed by all participating laboratories. Results are evaluated by the AIHA Proficiency Analytical Testing Programs, LLC and are used to determine laboratory proficiency.
Interlaboratory Comparisons	Evaluation of tests on the same or similar items by two or more laboratories.
Internal Quality Control	Routine activities and checks, such as periodic calibrations, duplicate analyses and matrix spikes that are included in routine internal procedures to control the accuracy and precision of measurements.
Limit of Detection	The lowest concentration of a substance that can be measured by an instrument.
Method	An orderly arrangement of steps to accomplish sample analysis.
Outlier	A result that is outside the statistical control limits determined for a sample
Policy	An organization's written statement of commitment to implement a management program element.
Precision	The degree to which a set of observations or measurements of the same property, usually obtained under similar conditions, conform to them. Precision is often expressed as standard deviation, variance or range, in either absolute or relative terms.
Preventive Action	A planned activity to identify, recognize and control potential sources of nonconformance and to introduce needed improvements.
Probationary Period	A time period during which the analyst performs analysis under supervision, or where their results are checked by the QA manager for proficiency and accuracy. A typical probationary period involves training in the organization's quality system, repeated analysis of reference slides and recounts of samples previously analyzed by other analysts.
Procedure	A written set of instructions that describe how to implement a policy requirement, or how to carry out a specific task.
Proficiency Analytical Testing	Refers to any proficiency analytical testing program(s), such as the programs established under the AIHA Proficiency Analytical Testing Programs, LLC.
Quality	The suitability of a product or service for use, as perceived by the user.
Quality Assurance	An integrated system of activities involving planning, quality control, quality assessment, reporting and quality improvement to ensure a product or service meets defined standards of quality within a stated level of confidence.

Term	Definition
Quality Assurance Program	See <u>Quality Assurance</u> .
Quality Control	The operation procedures used to ensure that the analytical data are of known and acceptable precision and accuracy.
Quality Manual	A document stating the quality policy, quality system and internal quality control procedures of the laboratory.
Quality System	See <u>Quality Assurance</u> .
Registered Analyst	An analyst, affiliated with an approved organization, who has meet the requirements of inclusion on the registry: AAR application approval and AAT proficiency, and maintains their AAT proficiency.
Registered Organization	An organization that has applied to the AAR program and that has successfully completed the application process.
AAR Program Fee Schedule	A document that lists all current fees for all AIHA Registry Programs and associated proficiency programs. This document includes enrollment forms, a stock sample order form, a retest order form, and the enrollment dates for these programs.
Requirement	An essential criterion necessary for approval.
Round Robin	Interlaboratory quality control wherein three separate organizations exchange samples. Each organization analyzes the samples and statistical comparison is performed on the results to access the variability of fiber counting measurements between organizations. To meet AAR program and OSHA requirements, each organization shall participate in at least two round robins annually
Sample Log	A document where sample identification, date received, customer, etc., are noted when samples arrive at the laboratory. The log is part of the sample tracking system. See <u>Sample Tracking</u> .
Sample Tracking	A document system of following a sample from receipt at the laboratory, through sample processing and analysis, to final reporting. The system includes unique numbering, or bar coding labels, and the use of a <u>Sample Log</u> .
Standard Operating Procedure	A written document that details the procedures of an operation; an analysis or action whose techniques and procedures are thoroughly prescribed, and which are accepted as the procedure for performing certain routine or repetitive tasks.
Subject Matter Expert	A group of volunteer technical representatives from Industrial Hygiene or Environmental Health and Safety professions with expertise pertinent to the registry program's subject that provide technical guidance and support to the AIHA Registry Programs.
Suspension	A temporary removal of the approval status of an organization or its analysts when it is found to be out of compliance with specific program requirements.
Transfer Analyst	An analyst who has previously been enrolled in the AAR program and is seeking reinstatement of their AAR enrollment and registration status.
Triennial Application	A renewal application that shall be submitted every three years by any approved AAR organization.

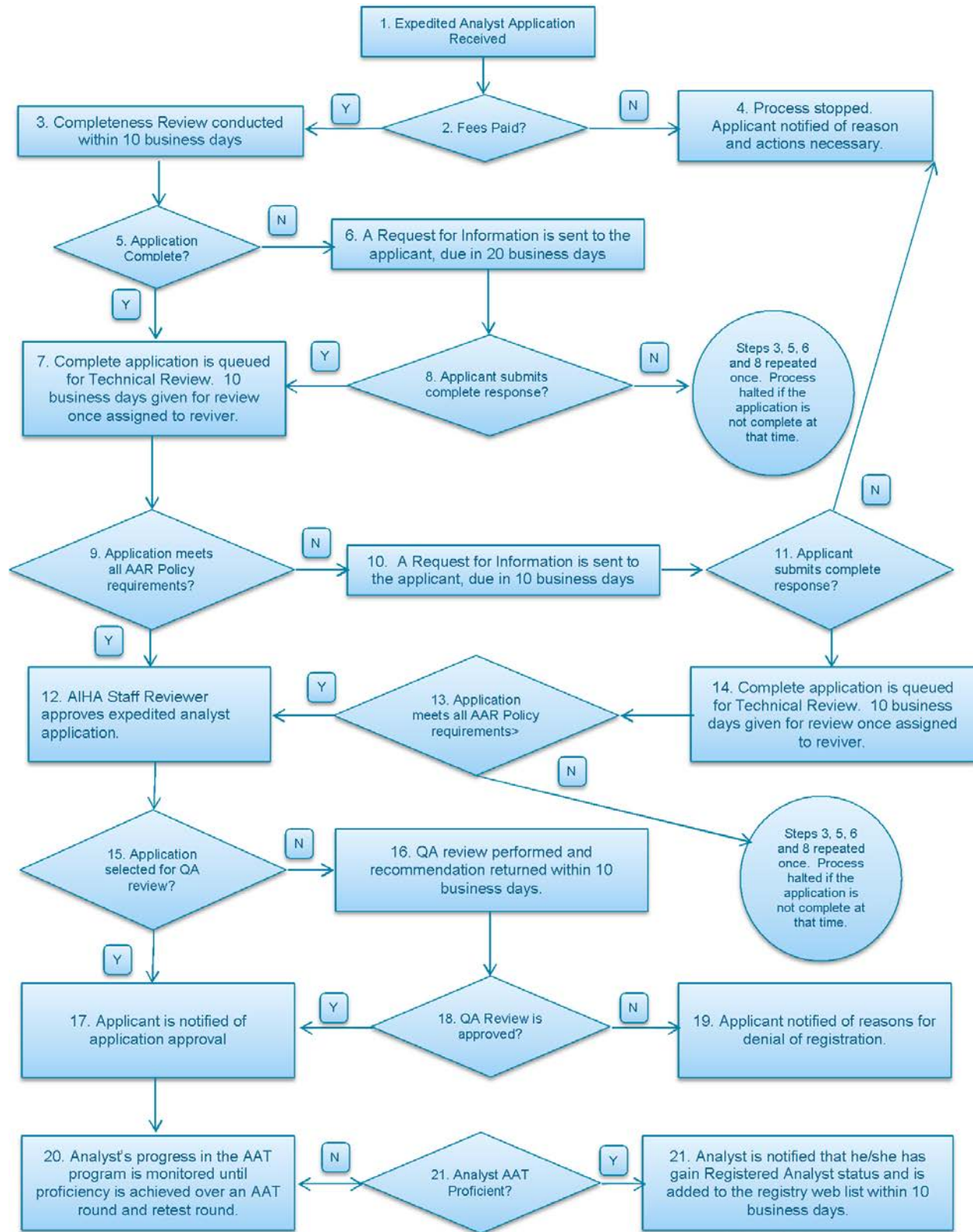
APPENDIX B: INITIAL ORGANIZATION REGISTRATION PROCESS



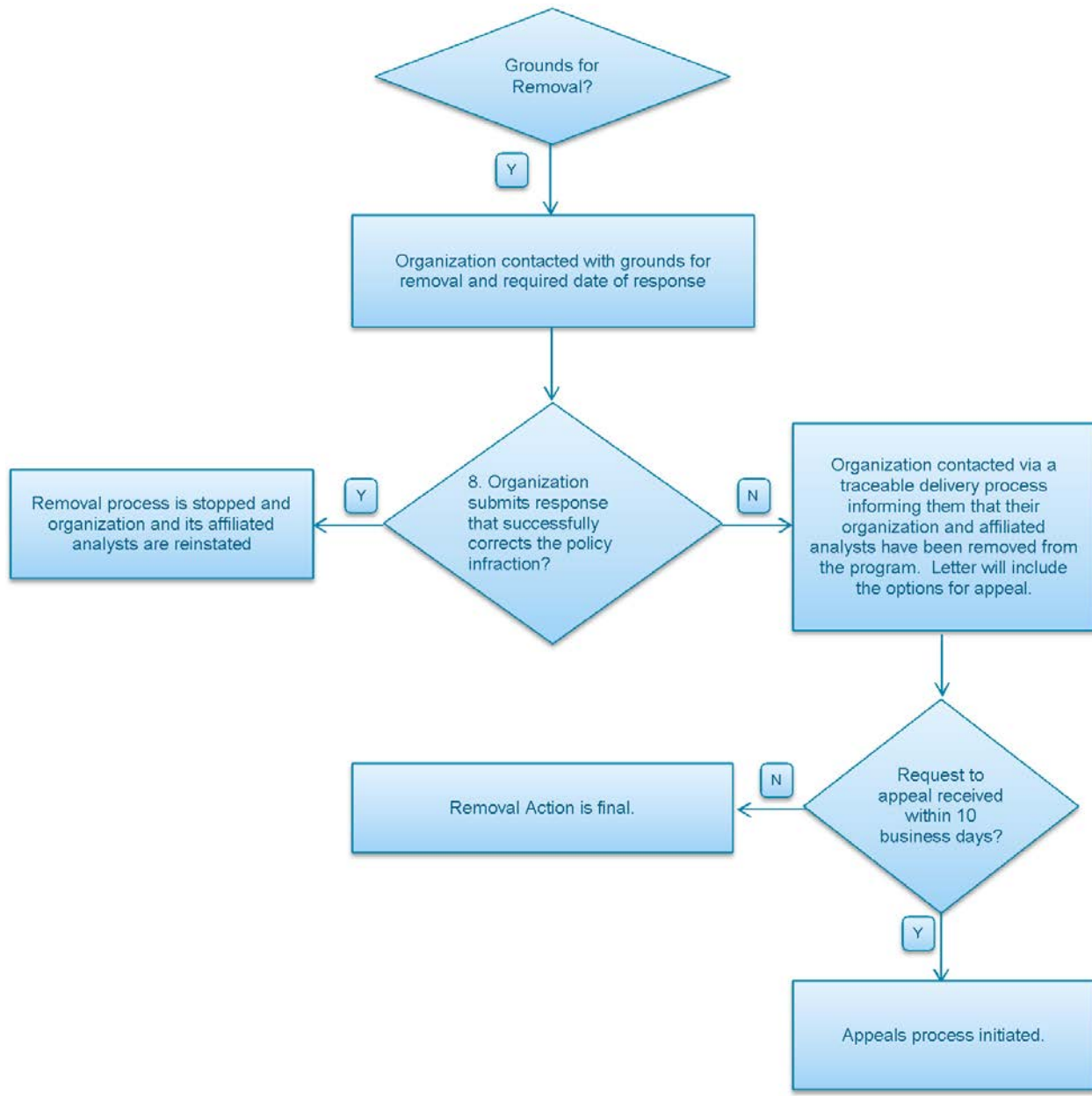
APPENDIX C: ANALYST REGISTRATION PROCESS



APPENDIX D: EXPEDITED ANALYST REGISTRATION PROCESS



APPENDIX E: AAR REMOVAL PROCESS



APPENDIX F: AAR APPEALS PROCESS

