

### **3. EMAP Commission statement on “draft” documents:**

At its June 2003 meeting, the EMAP Commission discussed the issue of assessor review of compliance documentation that is marked or otherwise recognizable as “draft” or “working draft”. All three of EMAP’s standing committees had discussed the issue in prior meetings and provided comments or recommendations to inform the Commission’s discussion.

The following statement is provided as guidance to programs and assessors:

If a document is submitted for compliance, the document can be considered in determining compliance with standards requirements only if the documentation in question has/have been approved or otherwise authorized for use in accordance with the jurisdiction’s policy/protocol regarding promulgation or approval of that type of document. This includes documents marked “draft” or otherwise recognized as “draft”, “working draft”, or other similar interim status, meaning there must be documentation that the document has been accepted or authorized and distributed for use pending completion of the promulgation/approval process.

If a jurisdiction does not have a policy or procedure for promulgation or approval of plans or other documents, assessors will consider the following factors in determining whether to consider “draft” or competing documents in determining compliance:

- the length of time a document has been "draft" (just created? ever implemented?)
- how widely known and accepted the document or procedure is
  - documentation showing approval or recognition as operating document?
  - documentation showing distribution, dissemination, exercise?
- what is the process utilized by the program for policy development including review and vetting? is there documentation of status of that process? has it been followed and completed?

To avoid the appearance of impropriety, proof of compliance documentation that is developed during the on-site assessment by the Program stakeholders will not be reviewed or considered during the on-site assessment. Newly developed proof of compliance documentation that has been promulgated or approved, distributed and implemented can be provided in the supplemental or conditional phase.

In addition, if a proof of compliance document has been substantially changed during an on-site assessment, the Program must show how that document has been promulgated or approved per the Program policy or procedures, distributed and implemented.