



PERFORMANCE TESTING QUALITY ASSURANCE MANUAL

2024 EDITION

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1 Introduction

This document, the GBCI Performance Testing Quality Assurance Manual, has three primary purposes: to serve as a reference document for Performance Testing Agents; to provide guidelines for administering quality assurance over the performance testing process; and to improve consistency of performance testing services delivered by Performance Testing Agents.

Adherence to the guidance in this manual will maintain a high level of consistency and accuracy with performance testing services, and in turn maintain a high level of integrity for the WELL™ Certification program. All Performance Testing Agents are required to follow the guidance contained in this Quality Assurance Manual.

1.1 GUIDING PRINCIPLES

Green Business Certification Inc. employs five guiding principles to support the vision and mission of the organization. These provide a foundation for operational strategy and growth and serve as a tool for evaluating both successes and new challenges. These principles are particularly relevant for conducting performance testing services:

Assuring Validity and Quality

We ensure rigor in the design, development, and implementation of the processes we use to measure green building performance (certification) and green building practice (credentialing). Our approaches and methodologies are designed for consistency and objectivity to assure the validity of our certifications and credentials.

Ensuring Transparency and Clarity

We are open and authentic in the way we do business and the information we make available. We operate within the standards and guidelines of our business. The way we conduct our business—with a deep sense of integrity and ethical responsibility—creates a sense of predictability in the marketplace. Our stakeholders know what they can expect from us.

Adapting to Change

We practice continuous improvement and adapt to the changing needs of the global marketplace, advancing our knowledge and expertise to move the green building industry forward.

Providing Excellence in Service

Our focus is on building relationships with those we serve. We provide excellence through high-quality responsiveness to our clients and customers. Our goal is to support and partner with our stakeholders for the long-term.

Driving Change to Create a Lasting Impact on the World

We affect the green building environment in an enduring way by verifying knowledge and performance. We influence long-term beneficial change by focusing on results that matter and recognizing leadership in the field. We feel a personal and organizational responsibility for creating global change that is economically, environmentally, and socially sustainable and lasting.

1.2 EXPECTATIONS OF PERFORMANCE TESTING AGENTS

1.2.1 Confidentiality of this document

This document is an internal work product and contains proprietary GBCI information and as such may only be shared with persons directly involved in conducting performance testing or overseeing performance testing services. This includes GBCI staff and Performance Testing Agents.

1.2.2 Sufficient Demonstrated Competence

Performance Testing Organizations and Performance Testing Agents are expected to maintain current familiarity with WELL program published documents, all referenced industry standards and GBCI guidance documents. They are expected to check for updates on a quarterly basis, at minimum.

Each Performance Testing Organization is responsible for maintaining sufficient environmental testing expertise to complete technically sound performance testing in compliance with documents published by IWBI, in particular WELL v2™ and the WELL Performance Verification Guidebook™.

Performance Testing Organizations and Agents are required to maintain their approved status based on the contract between IWBI and the Performance Testing Organization. The requirements are summarized below.

Performance Testing Organizations are required to meet the following in order to maintain their approved status:

- i. Maintaining at least one approved Performance Testing Agent on staff
- ii. Maintaining at least one WELL AP on staff
- iii. Completing at least one project per year
- iv. Maintain an average customer satisfaction rating of 4 stars (see Section 4.4)
- v. Maintain an average GBCI quality score of 4.5 with no score falling below 4.0 (see section 4.4)

Individual Performance Testing Agents are required to meet the following in order to maintain their approved status:

- i. Completing at least one project per year or attend a WELL Performance Testing Agent training every two years (fees apply)
- ii. Maintain an average customer satisfaction rating of 4 stars (see Section 4.4)
- iii. Maintain an average GBCI quality score of 4.5 with no score falling below 4.0 (see section 4.4)

1.2.3 Document Access and Version Control

Each Performance Testing Agent is responsible for ensuring that they have convenient access to all necessary reference documents, including, but not limited to: the WELL Building Standard™, WELL v2, WELL Performance Verification Guidebook, WELL Certification Guidebook, WELL Program Guidebook, any document that GBCI or IWBI publish as guidance for Performance Testing Organizations and Agents (for example, this document), and any standard referenced in the WELL Building Standard or WELL Performance Verification Guidebook.

It is the responsibility of each Performance Testing Organization and individual Performance Testing Agent to ensure that other members of the performance testing team adhere to the most current versions of GBCI guidance documents, including the Performance Testing Quality Assurance Manual.

1.3 ROLE OF GBCI CERTIFICATION

The Green Business Certification Inc. (GBCI) was founded in January 2008 with the support of the U.S. Green Building Council (USGBC) to provide independent oversight of professional credentialing and project certification services. GBCI is the only certification and credentialing body within the green business and sustainability industry to exclusively administer project certifications and professional credentials of LEED, EDGE, PEER, WELL, SITES, Sustainability Excellence, Parksmart and TRUE. GBCI provides third-party verification services for certification and credentialing through a scientific process by which a product, process or service is reviewed by a reputable and unbiased third party to verify that a set of criteria, claims or standards are being met. Certification and credentialing are used within the global green building industry to demonstrate credibility, provide a metric for comparisons, and add significant value. GBCI facilitates the WELL certification process, oversees quality and consistency for each Performance Testing Organization and Performance Testing Agent and evaluates their work on an ongoing basis.

In addition to issuing all WELL Certifications, GBCI:

- i. Administers quality assurance policies and issues related policy documents
- ii. Issues and enforces GBCI Professional Conduct and Disciplinary Guidelines

Performance Testing Agents are expected to review and assess individual features according to published requirements.

1.4 THIRD-PARTY ASSESSMENTS

One of the core strengths of the WELL Certification model is that the program features are all reviewed and assessed by an impartial third party. Third-party assessment is essential to the integrity of the program because it gives property owners confidence and reassurance that their project is constructed the way it was designed.

1.5 DEFINITIONS

The following definitions are used consistently throughout this document to refer to parties involved in the WELL Certification process:

Project team: an individual or team seeking WELL Certification of a building or space.

Green Business Certification Inc. (GBCI): organization that manages the accreditation of individuals and the certification of WELL buildings.

WELL Reviewer: an individual who provides review of performance verification submittals for projects applying for WELL certification.

International Well Building Institute (IWBI): developer of the WELL Building Standard.

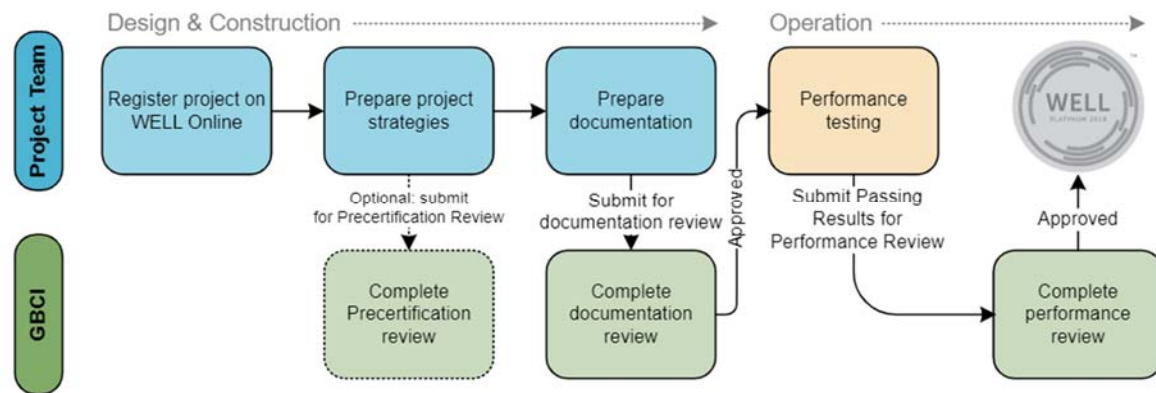
Performance Testing Organization: organization authorized to conduct the required performance testing for projects pursuing WELL Certification.

Performance Testing Agent: individual authorized to conduct the required performance testing for projects pursuing WELL Certification.

Performance Verification Guidebook: This guidebook summarizes the performance testing and submittal requirements for each performance test within the WELL Building Standard.

2 Overview

2.1 CERTIFICATION PROCESS



2.1.1 Performance Verification

After the project is complete, the project team will contract with a Performance Testing Organization to conduct the performance testing. The Performance Testing Agent assigned to the project must verify (via performance testing) that the performance requirements have been met. Once results are determined to be passing, the Performance Testing Agent submits the performance testing results through WELL Online for review.

2.2 PERFORMANCE TESTING PROCEDURES

2.2.1 Preparation before going on site

The Performance Testing Agent should be familiar with the documentation-phase submittal, the project schedule, confirm that any construction on the project has been completed, all policies and operational strategies are in place and the project has reached a point of readiness for performance testing before going on site.

Prior to going on site, the Performance Testing Agent completes the following preparatory tasks:

- i. Request the name of a primary point of contact on the site. This individual should have the authority to ensure that the Performance Testing Agent has access to all areas of the site associated with the assessment, and be available on site during the entire duration of the Performance Testing Agent's site visit (including after regular operating hours)
- ii. Communicate with the project team on the date(s) and time(s) of a visit and clearly outline expectations including any steps the project team must take to prepare for the site visit/assessment
- iii. Provide the project team with a site visit agenda to clearly communicate what activities will be done on site and approximately how long the site visit will take
- iv. Prepare a site visit checklist of features to be assessed and/or tested
- v. Prepare program required assessment materials (as applicable)
- vi. Arrange sample preparation, delivery, and analysis with third-party laboratories, as applicable

- vii. Ensure that all areas within the project scope are accessible and available for testing. Project teams with sensitive areas that they wish to exclude from testing (e.g., rooms with security or privacy concerns) must contact GBCI and receive approval prior to scheduling performance testing
- viii. Identify sampling locations and the measures that will be assessed in each location (if applicable)
- ix. Confirm with the project team that any construction is complete, and project has reached a point of readiness for performance testing

The Performance Testing Agent is responsible for procuring and bringing the necessary assessment equipment. All equipment must meet the specifications described in the WELL Performance Verification Guidebook and must be calibrated within the manufacturer's specifications.

Each project should have an assigned Performance Testing Agent. Additional performance testing experts or additional Performance Testing Agent's may assist in conducting performance testing, but the primary Performance Testing Agent is responsible for the entire performance testing submittal, and all associated quality scores and metrics associated with the submittal will be ascribed to the primary Performance Testing Agent. The primary Performance Testing Agent must be on site at all times during WELL performance testing and must conduct or oversee all testing.

2.2.2 Conduct while on-site

While on site, the Performance Testing Agent must maintain impartiality and not convey the results of the assessment to the project team or owner. Be professional, composed, able to quickly adapt to site conditions that might not have been expected, and calmly update the project team representative on any updates to the original site visit plan. The Performance Testing Agent is required to carefully record their assessment observations for each measure evaluated and whether each measure has passed or failed.

After the Performance Testing Agent/organization have completed their in-house quality review of the test results for quality and accuracy, the Performance Testing Agent may provide the results to the project team. The Performance Testing Agent may not indicate that a feature is earned/awarded or that a project will achieve certification. The project may require additional site visits to address non-conforming features. The Performance Testing Agent should notify project teams when they have submitted the testing results through WELL Online for review. The Performance Testing Agent may not communicate the certification status of the project to the Owner or project team until after the final certification decision has been issued.

Please be reminded that as stated in the Conflict-of-Interest Policy (Section 5.1 of this Manual), the Performance Testing Agent is not permitted to provide consulting, design, construction and/or operational services or advice to the Owner or project team at any point during the certification process; this includes during site visits.

2.2.3 Liability Disclosure

The project team is solely responsible for the selection, design, installation, and operation of all strategies. The Performance Testing Agent is responsible only assessing compliance of the strategy as set forth in the program requirements. As such, the assessment in no way constitutes a warranty as to

the appropriateness of the selected strategies nor the quality with which they have been implemented. The Performance Testing Agent may wish to consider including this language in their contract with the client.

2.3 FOLLOW-UP POST SITE VISIT

Performance Testing Agents communicates the results of performance testing to the project team. Project teams should conduct curative action in any areas with results that indicate that the project would not pass the feature requirements and a Performance Testing Agent must conduct retesting prior to the Performance Testing Agent submitting results through WELL Online. Any changes to the project space or curative action taken must be disclosed in the performance testing results submittal. If re-testing has occurred, non-passing results do not need to be submitted.

If there are no outstanding items that need to be addressed by the project team, the Performance Testing Agent must inform the project team when the performance testing results have been submitted through WELL Online for review. It is important to keep the project team informed on the status of their project in the certification process. GBCI is the certification body authorized to issue certifications and will communicate the certification outcome directly to the project team.

Additional requirements:

- i. Report templates: IWBI will provide submittal templates for performance testing results. Information submitted through WELL Online must also include all raw data collected on site, all data calculations, and photographs taken on site.
- ii. Coordination with third-party laboratories: For performance testing site visits, the Performance Testing Agent is responsible for all necessary coordination with third party laboratories as applicable and all performance testing equipment.
- iii. The Performance Testing Agent should be designated in the Teams tab of WELL Online for each project for which they are the primary Performance Testing Agent. If the project team will not add the Performance Testing Agent, reach out to IWBI via ptagents@wellcertified.com
- iv. If more than one Performance Testing Agent is providing services for a specific project, a single Performance Testing Agent must be designated as responsible for all testing results, compiling and submitting the performance testing results for review. GBCI's quality review, feedback and quality score will be tracked to the designated Performance Testing Agent.

2.4 PERFORMANCE REVIEW

After the Performance Testing Agent submits the performance testing results through WELL Online, GBCI will conduct a review of the Performance Testing Agent's work, assess the quality and completeness of the submission, and provide feedback to the Performance Testing Agent through the Performance Review process. If there are questions, the Performance Testing Agent may need to provide or request additional information from the project team, as necessary.

2.5 CURATIVE ACTION and APPEAL REVIEWS (OPTIONAL)

Curative action and appeal reviews provide for additional rounds of review and/or testing and allows a project team to submit supplementary information, provide curative action for features not awarded, or add new features not previously attempted. If needed, the Performance Testing Agent may conduct follow-up testing and submit their updated results through WELL Online. A review of the updated information submitted by the Performance Testing Agent will be performed and response to the project team with the final decision will be provided. There is no limit on how many times a project team may submit for curative actions and appeal reviews, but each additional round of review is subject to fees.

2.6 CUSTOMER SERVICE

Performance Testing Organizations and their Performance Testing Agents are expected to act at all times with the highest degree of professionalism and ethics and follow the highest standard of quality customer service. It is important to note that one poor customer experience can jeopardize perceptions about a new certification standard or program, therefore it is essential that all Performance Testing Agents provide best-in-class customer service at all times, without exception. GBCI monitors customer satisfaction via customer feedback and surveys.

2.7 REVIEW CHALLENGE POLICY

The Review Challenge Policy protects the integrity and fairness of the certification programs administered by GBCI. This policy is a quality check on the GBCI certification process by providing a mechanism to challenge a review ruling rendered by GBCI. It is anticipated that resolution of technical issues or disputes related to the requirements of a rating system or standard can be accomplished through our traditional customer support channels. If, however, resolution of the technical issue at hand has not been satisfactorily achieved via GBCI's customer support channels, the owner or project team administrator may initiate a Review Challenge. More details on the Review Challenge Policy are available on our website at: <http://www.gbci.org/sites/default/files/gbci-review-challenge-policy.pdf>.

2.8 CERTIFICATION CHALLENGE POLICY

The Certification Challenge Policy protects the integrity of the certification programs administered by GBCI. This policy is intended to function as both a quality check on the GBCI certification process, as well as an instrument designed to detect and remedy incidents of intentional or inadvertent misrepresentation which result in the inappropriate award of certification. This policy is not meant to serve as a vehicle for the adjudication of disputes between outside parties. More details on the Certification Challenge Policy are available on our website at: <https://www.gbci.org/sites/default/files/gbci-certification-challenge-policy.pdf>

3 Roles and Responsibilities

Each WELL project consists of a project team and Performance Testing Agent(s). GBCI is the certification body conferring WELL Certification.

3.1 PROJECT TEAM ROLES

The project team is responsible for the design, implementation, construction, and ongoing operations of the project pursuing WELL Certification, including:

- i. Registering project in WELL Online
- ii. Pays registration and certification fees to IWBI
- iii. Designs, builds, and operates project, following all applicable code requirements
- iv. Ensures compliance with all WELL features (preconditions and pursued optimizations) and submits for optional Design + Operations review, and mandatory documentation review
- v. Contracts or requests IWBI to contract a Performance Testing Organization for mandatory performance testing services
- vi. Notifies assigned Performance Testing Agent when project is ready for performance testing
- vii. Accepts final WELL Certification for the project

3.2 PERFORMANCE TESTING ORGANIZATION

- i. Confirms adequate training and credentials for their Performance Testing Agents
- ii. Performance Testing Agent assigned to the project oversees performance testing and is accountable for the quality and completeness of performance testing results and supporting documentation submitted through WELL Online
- iii. Performance Testing Agent assigned to the project submits for Performance Verification review

3.3 CERTIFICATION BODY (GBCI)

- i. Reviews WELL submittals (e.g., documentation submittal), including all mandatory submittals for certification
- ii. Reviews performance testing results submitted by Performance Testing Agents
- iii. Awards WELL Certification to projects that have demonstrated achievement of all preconditions, and attempted WELL optimizations

3.4 INTERNATIONAL WELL BUILDING INSTITUTE (IWBI)

- i. Reviews and approves applications from Performance Testing Organizations
- ii. Maintains a public list of approved Performance Testing Organizations and Performing Testing Agents

4 Quality Assurance and Quality Control

GBCI is committed to ensuring the integrity of WELL Certification through the implementation of rigorous quality assurance measures throughout the verification and certification process.

4.1 QUALITY ASSURANCE EXPECTATIONS FROM PERFORMANCE TESTING AGENTS

Every Performance Testing Organization is responsible for their Performance Testing Agents and for maintaining sufficient expertise to complete technically sound performance testing for projects pursuing WELL Certification. Quality management measures must be employed to ensure that the Performance Testing Agents complete the performance testing accurately and with technical rigor in accordance with the certification program's requirements (WELL Performance Verification Guidebook, WELL Building Standard and WELL Certification Guidebook), and procedural consistency in accordance with the requirements of GBCI's Performance Testing Quality Assurance Manual (this document).

4.2 QUALITY MANAGEMENT PLAN

Prior to approval as a Performance Testing Organization, an organization must submit a detailed Quality Management Plan, which presents a framework for the procedures by which a Performance Testing Organization ensures quality is maintained and managed (including providing continuing education and training) across their team of Performance Testing Agents.

The Performance Testing Organization's Quality Management Plan should address the following, at a minimum:

- i. A set of specific goals to be achieved by the Quality Management Plan
- ii. The roles and responsibilities related to Quality Management for the Performance Testing Agent and other individuals who provide internal quality assurance
- iii. There is at least one GBCI approved Performance Testing Agent on staff
- iv. An approved Performance Testing Agent must be assigned to each project and this same Performance Testing Agent must be on site at all times during WELL performance testing and must conduct or oversee all testing
- v. Quality Control process to ensure an additional layer of quality assurance is provided via detailed quality review of all work prior to submittal through WELL Online
- vi. Process in place to monitor work of the Performance Testing Organization and each Performance Testing Agent receiving scores below 4.5, and that address issues as needed
- vii. Process for tracking and keeping records to confirm that Performance Testing Agents are trained annually on, and have agreed to, the following:
 - a. Professional Conduct Guidelines outlined in this document
 - b. Conflict of Interest policy outlined in this document
- viii. Process to ensure that all Performance Testing Agents are educated on the Performance Testing Organization's Quality Management Plan, and their respective roles in implementing the Quality Management Plan
- ix. Process for responding to GBCI-issued Corrective Action Requests (CAR) and developing and implementing appropriate corrective action procedures
- x. Process to ensure ongoing professional development of Performance Testing Agents to ensure they are up to date with industry trends

4.3 GBCI QUALITY OVERSIGHT PROCESS

GBCI is committed to ensuring the integrity of all its certification programs through the implementation of rigorous quality assurance and quality control measures throughout the assessment and certification process. The specific quality assurance and quality control measures that GBCI will implement are:

- i. Quality Monitoring and Reporting
- ii. Periodic Audits

4.4 QUALITY MONITORING AND EVALUATION

GBCI will monitor the work submitted by Performance Testing Agents to assess the ongoing quality of their work product. Quality scores for Performance Testing Organizations will be calculated based on the aggregate score received for Performance Testing Agents associated with that organization. For organizations with only one Performance Testing Agent, quality scores for the organization will be determined by the scores for their sole Performance Testing Agent. Scores will be shared with the Performance Testing Organization on a periodic basis after the Performance Review is completed for a given project. GBCI may reach out to request a conference call or response to a corrective action request if scores in a report are not found to be meeting quality expectations.

4.4.1 Quality Metrics

The following are examples of parameters that may be evaluated (list is not exhaustive), to monitor the quality of work and performance of each Performance Testing Agent and Performance Testing Organization.

- i. Quality and completeness of performance testing results submitted through WELL Online
- ii. Adherence to GBCI and IWBI protocols and procedures
- iii. Customer experience

4.4.1.1 Performance Testing Evaluation Metrics:

The quality of performance testing results submitted will be evaluated based on two core competencies:

- i. Technical Competency: evaluation of the technical accuracy of the performance testing completed by the Performance Testing Agent
- ii. Submittal quality and adherence to GBCI protocols: evaluation of the completeness of the submittal including calculations and analysis of the performance testing results

Each of these competencies is scored on a scale of 1-5, with 1 representing poor quality and 5 representing high quality. The following table outlines the qualitative significance of the scores received by a Performance Testing Agent with respect to whether performance is meeting GBCI Quality Expectations or not. All Performance Testing Agents are expected to maintain average quality scores of 4.5 or above, with no one score falling below 4.0.

4.4.1.2 Qualitative Significance of Scores

The following table outlines the qualitative significance of the scores received by Performance Testing Agent with respect to whether performance is meeting GBCI quality expectations or not.

Score Range	Qualitative Evaluation
4.5 or above	Performance is meeting GBCI quality expectations
4.0-4.4	There is room for improvement
3.5-3.9	Performance is critically below GBCI Quality Expectations and there is significant room for improvement – Corrective Action Request likely to be issued
<3.5	Performance is unacceptable and the integrity of the certification program is compromised – Corrective Action Request will be issued, and approved status will be reviewed

4.4.1.3 Customer Experience Evaluation Metrics:

The quality of the customer experience will be evaluated based on customer satisfaction ratings and periodic feedback surveys sent to the customer. The results from the ratings and the surveys will be considered in the overall quality evaluation of the Performance Testing Agent's work.

i. Customer Satisfaction Rating

Customer Feedback Survey: After each performance testing event, the Owner/project team may complete a customer satisfaction rating on a scale of 1 to 5 stars, with 1 representing poor customer satisfaction and 5 high customer satisfaction.

ii. Customer Feedback Survey

GBCI will periodically send surveys to owners/project teams to gather more detailed feedback on their customer experience. The customer survey may evaluate the following:

- a. Clarity of communication
- b. Technical understanding of the project and requirements
- c. Responsiveness to inquiries
- d. Timeliness
- e. Conduct of the site visit
- f. Professional conduct
- g. Overall satisfaction with the Performance Testing Agent

4.4.3 GBCI Quality Expectations:

Performance Testing Agents must maintain an average of 4.5 or above score for the Performance Testing (with no one score below 4.0) and an average of 4 stars or above for customer satisfaction metrics. Note that if GBCI quality expectations are not met, GBCI may remove the Performance Testing Agent from the approved list. In instances where a Performance Testing Organization has only one Performance Testing Agent, this may result in the Performance Testing Organization also being removed from the approved list.

4.5 AUDITS

A Performance Testing Agent may be selected for audit one of three ways:

- i. Performance Testing Agent is randomly selected.
- ii. Performance Testing Agent quality scores cause concern

- iii. Performance Testing Agent has been placed on probation under the Professional Conduct and Disciplinary Policy and is therefore subject to audit during probationary period

The project audit will include documentation submitted for review and may include a conference call and/or a site visit to the project. If potential non-conformities are found, the audit may be expanded to include other project audits, to confirm whether or not it is a systematic failure. Expenses associated with additional site visits may be billed directly to the Performance Testing Organization.

If selected for an audit (whether annual or for cause), the Performance Testing Organization and assigned Performance Testing Agent must be prepared provide all information related to the project as outlined below in section 4.5.1 Record Keeping, and any other documentation requested to ensure the completion of a smooth audit review. If the Performance Testing Organization or their Performance Testing Agent does not cooperate with the audit process, GBCI may initiate disciplinary action (outlined in section 6.3).

4.5.1 Record Keeping

The following and any other critical documentation of the quality assurance process must be retained by the Performance Testing Organization for a minimum of 3 years following project certification:

- i. Performance Testing Organization credentials:
 - a. Records of approved Performance Testing Agents
 - b. Records of WELL AP
- ii. Communication records:
 - a. All communication (e-mails, meeting minutes, etc.) between the Performance Testing Organization, Performance Testing Agent, project team and associated third parties such as laboratories
- iii. Lab related records:
 - a. Order forms
 - b. Chain of custody forms
 - c. Lab results
- iv. COI records:
 - a. Compliance with GBCI COI Policy
 - b. Copies of COI forms that were included as part of the performance testing submittal
- v. Project related records:
 - a. Record of all projects that the Performance Testing Organization has been contracted with to conduct performance testing for WELL certification and the assigned Performance Testing Agent
 - b. Records (e.g., photographs, video, field notes) showing testing parameters (e.g., flow rates, height, and location of equipment)
 - c. Raw data from all performance tests
 - d. Calculations and analysis of testing results
 - e. Complete submittal package
- vi. Equipment records:
 - a. Records showing that the equipment used complies with the device requirements outlined in the Performance Verification Guidebook

- b. Equipment maintenance and calibration records detailing that equipment used was within calibration period as specified by the manufacturer

4.5.2 Project Documentation and Communications

Performance Testing Organizations must maintain documents submitted through WELL Online, as outlined in Section 4.5.1 above, for a minimum of 3 years after project completion. Aside from certification submittal requirements, these need not be provided via WELL Online, but must be made available upon request in the event of an audit, or if there is a complaint or Certification Challenge according to [GBCI's Certification Challenge Policy](#).

4.5.3 Audit Findings Report

After the audit, GBCI will provide the Performance Testing Organization with an Audit Report informing them of the findings. If there are no issues, the report will state as-such and no further action on the part of the audited Performance Testing Organization or the Performance Testing Agent will be required. If there are minor non-conformities discovered during the audit, GBCI may request additional information and/or hold a call with the Performance Testing Organization and the Performance Testing Agent to seek further clarification and provide recommendations for future assessments.

If there are major non-conformities, GBCI will issue a Corrective Action Request to the Performance Testing Organization, which may place the Performance Testing Agent(s) under Probation status (see Disciplinary Action section 6.3 of this manual). In instances where a Performance Testing Organization has only one Performance Testing Agent and that agent is placed on probation, the Performance Testing Organization will effectively be under probation status.

5 Impartiality

All Performance Testing Agents shall be responsible for the impartiality of their assessment and review activities and shall not allow commercial, financial, or other pressures to compromise their impartiality. Impartiality refers to the presence of objectivity, which is understood to mean that conflicts of interest (COI) do not exist, or are resolved in consultation with GBCI in advance, so as to not to adversely influence the activities of the Performance Testing Agent. Note Performance Testing Agents will be required to re-confirm that they are abiding by GBCI's code of conduct and whether there is a COI, each time performance testing results are submitted through WELL Online.

The Performance Testing Organization and Performance Testing Agent shall identify risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities and relationships both as a company and from the relationships of its personnel. A relationship presenting a risk to the impartiality of the Performance Testing Organization and the assigned Performance Testing Agent can be based on personal relations (such as friend, relative, etc.), ownership, governance, management, personnel, shared resources, finances, contracts, marketing (including branding), and payment of a sales commission or other inducement for the referral of new clients, etc.

5.1 CONFLICT OF INTEREST POLICY

This policy document formally defines the types of services that can be provided by a Performance Testing Organization's, Performance Testing Agent assigned to a WELL project and the required disclosure policies.

The Conflict-of-Interest policy identifies the following types of actions that Performance Testing Agents are permitted to perform on a specific WELL project (outside of performance testing tasks); actions that are considered a conflict of interest but are permitted with proper disclosure; and finally, actions that the Performance Testing Agent is prohibited from performing.

All conflict-of-interest disclosures must be signed by the Performance Testing Organization and the assigned Performance Testing Agent.

5.2 INTRODUCTION TO CONFLICTS OF INTEREST

Generally, a conflict of interest (COI) is a situation in which an individual has competing professional or personal interests on any given WELL project. Such situations include:

- i. **Professional:** Decisions may be influenced by competing professional obligations, for example having both a role on a project team and being the assigned Performance Testing Agent
- ii. **Financial:** Decisions may be influenced by financial gain, or potential business opportunity
- iii. **Legal:** Decisions may be influenced by liability risks
- iv. **Ethical:** Decisions may be influenced by reasons other than compliance with the required standards

The following sections provide additional guidance on how to navigate these types of issues if they occur and when and how to declare these conflicts to GBCI.

5.3 OVERVIEW OF CONFLICT OF INTEREST

The following summarizes the Conflict-of-Interest Policy:

- i. On a given WELL project, there is a **major conflict of interest** if the Performance Testing Agent (individual) contributes to consulting, design, construction and/or operation related services
- ii. Employees of the Performance Testing Organization that are not the assigned Performing Testing Agent for a given project may participate in consulting, design, construction and/or operations related services for said project. These types of services are permitted, however, the Performance Testing Agent and Performance Testing Organization must disclose their involvement in consulting, design, construction and/or operations related services in the appropriate section of the performance testing submittal template
- iii. Performance Testing Agents on a given WELL project (Project #1) are permitted to provide consulting design, construction and/or operations related services to another WELL project (Project #2), provided that they are not the assigned Performance Testing Agent on Project #2

5.4 DEFINING AND IDENTIFYING CONFLICTS OF INTEREST

There are three types of performance testing-related services, as pertains to the Performance Testing Agent discussed in this document: Major, Minor and Non-conflicted.

5.4.1 Prohibited Services - Definition of a Major Conflict of Interest

The following types of services constitute major conflicts of interest and **may not** be performed by the assigned Performance Testing Agent (an individual) for a given project:

- i. Design or consulting support services related to WELL, including:
 - a. Specifying products,
 - b. Creating drawings, details, or specifications, and
 - c. Performing design-related calculations.
 - d. Design of any aspects of building envelope or systems
- ii. Selling any product that will be installed in the WELL project
- iii. Installation services of any product in the project
- iv. Construction support services related to the WELL program (e.g., air sealing services, etc.)
- v. Acting as responsible party / signing Letters of Assurance
- vi. Ongoing operations related to the WELL project
- vii. Involvement in financing, sale, or purchase of the project

The Performance Testing Organization and assigned Performance Testing Agent must ensure that major conflicts of interest do not occur on any WELL project.

If the Performance Testing Organization or Performance Testing Agent becomes aware of a major conflict of interest, they must contact GBCI at GBCIPerformanceTesting@wellcertified.com immediately for discussion and resolution *prior* to completing any performance testing.

5.4.2 Conflicted Services - Definition of a Minor Conflict of Interest

While it is prohibited for the Performance Testing Agent assigned to a particular WELL project to engage in any Prohibited Services, other members of the Performance Testing Organization may provide these services, provided they are properly disclosed.

In such cases, the Performance Testing Organization may not bundle any conflicted services in the same contract as for performance testing services associated with WELL certification. A separate contract must be used that clearly states that these additional services are not required as part of WELL performance testing services under the WELL program.

The following types of services are considered minor conflicts of interest and must be disclosed on the performance testing submittal template (unless otherwise noted):

- i. Other members of the Performance Testing Organization, who are **not the assigned Performance Testing Agent for a project**, may provide consulting, design, construction and/or operational related services with proper disclosure. Such services may include:
 - a. Design support services related to the WELL program, including:
 - Specifying products
 - Creating drawing, details, or specifications
 - Performing design-related calculations
 - b. Construction support services related to the WELL Building Standard
 - c. Acting as responsible party / signing any Letters of Assurance
 - d. Designing /specifying the durability related measures
 - e. Ongoing operations related to the WELL project
- ii. Performance Testing Agent providing services without charge (voluntarily) to the project team must be disclosed

5.5 NON-CONFLICTED SERVICES

Educating the project team on the WELL Building Standard and Performance Verification guidelines and procedures, is not considered a conflict of interest, and may be performed in addition to performing testing services without disclosure

5.6 BEST PRACTICES TO AVOID OR MINIMIZE CONFLICTS OF INTEREST

5.6.1 Performance Testing Agent Identifying and Monitoring of Conflicts of Interest

As early as possible for **every** WELL project, the Performance Testing Agent shall determine if there is a potential conflict of interest. The Performance Testing Agent shall determine this by identifying the following:

- i. The full range of services being conducted by members of the Performance Testing Organization
- ii. Complete the COI disclosure section of the performance testing submittal template
- iii. If a major COI exists, notify GBCI at GBCIPerformanceTesting@wellcertified.com immediately. In most cases, the project will not be able to proceed unless the major COI is

addressed and resolved (e.g., the team member with the major COI is replaced with another professional)

5.7 VIOLATIONS OF THE COI POLICY

Violations of the COI Policy include:

- i. Performance Testing Agents performing prohibited services
- ii. Failure to notify GBCI, when a COI or potential COI exists

Performance Testing Agents that violate the COI Policy will be subject to disciplinary action, as described in the Section 6.3 of this manual.

6 Professional Conduct

6.1 PROFESSIONAL CONDUCT GUIDELINES

GBCI is committed to integrity in the delivery and certification of all programs. To ensure consistency and quality of program delivery, GBCI strictly enforces guiding principles and rules of conduct for all Performance Testing Agents. The professional behavior of all participants in the certification program is a critical element in market acceptance and overall success of the program. All Performance Testing Agents are contractually required to abide by the Professional Conduct Guidelines and Anti-Harassment Policy when delivering services in all markets. Note that a Performance Testing Agent may be required to take Professional Conduct/Anti-Harassment Training (either in-person or online) to demonstrate compliance with GBCI's professional conduct policy.

Professional Conduct Guidelines:

All Performance Testing Organizations and their Performance Testing Agents shall commit to these Professional Conduct guidelines:

- i. May **not** offer, accept, or solicit money (bribes), property, service or other items of value by way of gift, favor, inducement or loan with the intent that the offer would influence, or that the recipient would be influenced by, such conduct in the discharge of their Performance Testing Agent duties. This is a serious offense which will result in revocation of the approved status of a Performance Testing Agent and may result in the revocation of the approved status of the associated Performance Testing Organization.
- ii. May not use their official position to secure special advantage in business, personal gain or other benefit derived from such relationship
- iii. Must maintain objectivity and neutrality when conducting an assessment or audit and when presenting results
- iv. Have in place a Quality Management Plan (defined in Section 4.2 of this manual)
- v. Not engage in conduct that is detrimental to the reputation or the best interests of GBCI, USGBC, IWBI, WELL Building Standard or any other program certified by GBCI or competitor standards within the green building and health and wellness industries
- vi. Refrain from speaking negatively about other Performance Testing Organizations, their Performance Testing Agents or other persons involved in the performance testing profession
- vii. Refrain from initiating contact with and/or marketing services to project owners for a specific project that is already under contract with another Performance Testing Organization
- viii. Report violations of the professional conduct of other Performance Testing Organizations or Performance Testing Agents to GBCI, for review and possible disciplinary action
- ix. Comply with the technical standards and procedural requirements and request the input of GBCI whenever there is doubt about any project's compliance with the requirements and intent of any given feature
- x. Not disclose information concerning the status of a specific project to parties other than the project owner or the owner's agent without written permission of the owner or the owner's agent, except to report to GBCI for the purposes of certification

- xi. Commit to ongoing professional development and education to maintain Performance Testing Agent approved status, to advance current knowledge, education, training, and experience, so that customers and the public can be assured of receiving competent and reliable services from Performance Testing Agents
- xii. Fully disclose all applicable charges, as well as the general scope and deliverables of services, prior to conducting any service
- xiii. Make no representations regarding services or qualification that are false or misleading
- xiv. Comply with the Conflict of Interest (COI) Policy outlined in section 5, including reporting any conflicts of interest that are listed
- xv. Maintain supportive and professional tone with project teams during all communications and interactions

6.2 ANTI-HARASSMENT POLICY

All Performance Testing Organizations and Performance Testing Agents shall commit to this Anti/Harassment policy:

All individuals deserve to be treated with dignity and respect. GBCI is therefore committed to fostering a work environment free from harassment, intimidation and coercion based on or related to race, color, gender, religion, national origin (including ancestry), age, disability, veteran status, marital or familial status, sexual orientation, political affiliation, personal appearance, or any other classification protected by applicable law. Violation of this commitment is inconsistent with GBCI's philosophy of mutual respect for all individuals and will not be tolerated.

Illegal and improper harassment may include, but is not limited to:

- i. Offensive or abusive physical contact
- ii. Use of offensive nicknames or terms of endearment
- iii. Unwelcome comments about a person's clothing, body, appearance, or personal life
- iv. Offensive jokes or unwelcome innuendoes
- v. Use of email or internet system to retrieve or transmit offensive or harassing messages
- vi. Any suggestion that one's membership in a protected class would affect one's job or working conditions
- vii. Other conduct referring to race, gender, religion, etc., even if not objectionable to some Performance Testing Agents, if it creates a working environment that others may reasonably find hostile or offensive

Sexual harassment may consist of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when one or more of the following occur:

- i. Submission or rejection of such conduct is made a term or condition of an individual's contract
- ii. Submission or rejection of such conduct is used for the basis for an employment decision, such as promotion, demotion, termination, or compensation
- iii. Such condition interferes with an individual's work performance or creates a hostile, intimidating, or offensive work environment

Violations of this policy are not permitted and will result in disciplinary action, up to and including revocation of approved Performance Testing Agent status, and the possible revocation of approved Performance Testing Organization status.

6.3 DISCIPLINARY ACTION POLICY

It is GBCI's expectation that all Performance Testing Agents adhere to the policies and protocols in this manual and perform work of the highest quality with utmost integrity. GBCI may institute disciplinary action if a Performance Testing Agent is found to be in violation of any policies outlined in this manual; if a Performance Testing Agent is not meeting quality expectations; or if non-conformities are found during audits. Disciplinary action may also be triggered due to customer complaints (refer to Appendix A for the customer complaint investigation process).

Note: If a Performance Testing Organization has only one Performance Testing Agent on staff, these disciplinary actions will impact the approved status of the Performance Testing Organization.

There are three types of disciplinary action that may be taken against a Performance Testing Organization and their Performance Testing Agent(s):

- i. Corrective Action Request
- ii. Probation
- iii. Revocation of approved status and agreement with GBCI

These are each described below; GBCI maintains a record of all disciplinary actions.

6.3.1 Corrective Action Request

GBCI may issue a Corrective Action Request (CAR) to the Performance Testing Agent when an infraction or a non-conformity is seen due to any of the reasons noted above. The Performance Testing Agent must provide a written root cause analysis and corrective action plan within 20 business days to address the issues outlined in the CAR and put in place a process to ensure that infractions will not reoccur.

GBCI will hold a meeting with the Performance Testing Organization and the Performance Testing Agent to discuss their corrective action plan and will communicate approval of the plan or if any additional information is needed. GBCI will then closely monitor the work of the Performance Testing Organization and their Performance Testing Agent and impose heightened quality oversight. Depending on the nature of the infraction, GBCI may allow the Performance Testing Agent to continue operating (e.g., conducting performance testing), or may place restrictions on operation (for example, probation). Note that the Performance Testing Organization may be required to pay additional fees (including expenses associated with additional site visits) for increased quality oversight of projects submitted during the CAR period.

If GBCI observes the same or new infractions occurring, and/or the corrective action plan provided by the Performance Testing Organization is not working, GBCI may issue a second CAR or, depending on the severity of the infraction, may place the Performance Testing Agent under Probation or revoke the Performance Testing Organization's approved status. The Performance Testing Organization has 20 business days to provide a written root cause analysis and corrective action plan to address the issues raised in the second CAR and put in place a process to ensure that infraction(s) will not reoccur.

6.4 PROBATION

A Performance Testing Agent who receives a CAR may be placed under probation status and this will be communicated within the CAR.

Note that during the probation period, the Performance Testing Agent or Performance Testing Organization may be required to pay additional fees (including expenses associated with additional site visits) for increased quality oversight of projects submitted during the probation period.

At GBCI's discretion, the Performance Testing Agent's name may be temporarily removed from the list of approved Performance Testing Agent's and the Performance Testing Agent or approved Organization may be prohibited from taking on any new projects during this period.

The Performance Testing Agent will remain under probation status until GBCI deems that the infractions/non-conformities have been addressed satisfactorily by the Performance Testing Agent and clears the CAR against the Performance Testing Agent. If the infractions/non-conformities are not sufficiently addressed, the next step in the disciplinary process will be triggered, which is revocation.

6.5 REVOCATION

If the Performance Testing Agent does not address the issues during probation to the satisfaction of GBCI and/or the nature of the infractions are sufficiently serious (e.g., acceptance of a bribe), GBCI will revoke the Performance Testing Agent's approval. Note that it is not necessary for a Performance Testing Agent to receive a CAR or be under probation first in order to trigger a revocation. Depending on the seriousness of the infraction, GBCI reserves the right to revoke a Performance Testing Agent's approval to conduct WELL performance testing without issuing a CAR or placing the Performance Testing Agent under probation.

If issues or infractions are widespread throughout an organization, GBCI reserves the right to terminate the contract with the Performance Testing Organization and, depending on the nature of the infraction, potentially all associated Performance Testing Agents to conduct WELL performance testing.

The Performance Testing Agent will receive written (electronically or in paper form) notice from GBCI that the approval for providing Performance Testing Agent services has been revoked and the Performance Testing Agent has been removed from all public databases. The Performance Testing Agent is expected to cooperate with GBCI to determine how projects that are in progress (have begun or completed testing) but have not yet submitted, with the Performance Testing Agent will be supported to final certification.

6.6 APPEAL PROCESS

In the event that a Performance Testing Agent is notified that their approved status will be revoked, the Performance Testing Agent shall have the right to an appeal.

In order to be considered, the appeal must be filed within twenty (20) business days of notice of suspension or revocation. The appeal shall be submitted to GBCI in the form of a signed letter, containing all pertinent and substantive information. This includes a description of the circumstances of

the case and arguments and supporting documentation that are in contradiction to the proposed revocation.

The appellant Performance Testing Agent may request a telephonic hearing with GBCI. In such an event, GBCI shall, no later than twenty (20) business days after the filing of the notice of appeal, notify the appellant Performance Testing Agent of the date of the hearing, which shall be held as expeditiously as possible, but not later than thirty (30) business days after the receipt of the notice of appeal. A ruling on the appeal will be made not later than twenty (20) business days after the hearing has concluded.

APPENDIX A: Complaint Investigation Process

GBCI has a formal complaint submittal process. If an individual or organization reaches out to GBCI with any complaints and grievances that they may have with any Performance Testing Agent or Performance Testing Organization the following information will be requested:

- i. The name of the complainant and contact information
- ii. The Performance Testing Agent and/or Performance Testing Organization that is the subject of the complaint
- iii. A complete description of the alleged violation(s)
- iv. A recitation of all the facts documenting the complaint including contact information
- v. Copies of any relevant documents supporting the complaint

Upon receipt of a formal and complete complaint, GBCI will review and consider the documentation contained in the formal complaint in deciding whether to proceed or dismiss the complaint. In cases where the documentation submitted does not meet the minimum standards for a complaint, the complaint may be dismissed. GBCI shall notify both parties of the findings.

In cases where GBCI finds that the complaint should proceed to the next step, GBCI shall send a copy of the complaint to the subject of the complaint immediately. The subject of the complaint has thirty (30) business days to submit a full and complete response to the complaint. All relevant information and documentation shall be included in the response. The response shall be in writing and sent to GBCI. Once the investigation is complete the complaint will either be dismissed, or the Disciplinary Policy noted in Section 5 will be triggered.

GBCI will only inform the complainant of the outcome once the full investigation and/or disciplinary process is complete.