

NAHCT Detailed Guide to 2025 ANAB E2659-18 Updates

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The National Association of Hospitality Compliance Trainers (NAHCT) is committed to supporting training providers in understanding and adapting to industry standards. This document is designed to help certificate issuers and course providers interpret the recent changes to the ANAB (ANSI National Accreditation Board) accreditation requirements, especially those aligned with the ASTM E2659-18 standard.

These changes include both clarifying edits and substantive new requirements that may impact how training programs are designed, documented, delivered, and evaluated.

In the following sections, you'll find each major clause change explained in detail, along with practical guidance on what it means for your organization, recommended steps for compliance, and simpler tips for getting started without overcomplicating your processes.

Our goal is to help providers maintain accreditation while making these updates as clear, manageable, and cost-effective as possible.

Please note the **Disclaimer** at the end of this document: This material is not legal advice or professional consulting and should not be relied upon as such.

1 Advisory Group (5.1.4)

◆ What Changed

5.1.4.2 The advisory group shall have input into, at minimum, the certificate program (1) target audience, (2) purpose, (3) scope, (4) requisites, (5) term, (6) intended learning outcomes, **(7) instructional design and (8) summative assessment security.**

◆ What This Means

ANAB is now explicitly requiring your Advisory Group to be *documented* as reviewing and providing input on:

- Instructional design plan
- How you ensure security of the summative assessment

Previously it was enough for them to weigh in on purpose, scope, and outcomes. Now you need to **document that they also review your assessment security and instructional design.**

✔ Recommendations

✔ Update your Advisory Group meeting agenda to include:

- Review of assessment security (e.g., test access control, proctoring plan)
- Review of instructional design (e.g., learning outcomes match assessment)

✔ Record minutes or notes:

- Who attended
- Topics reviewed
- Decisions/recommendations

✔ Keep that record in your audit folder.

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✔ Add **one extra line** to your Advisory Group meeting template:

“Reviewed instructional design and assessment security.”

2 Management System (5.2)

◆ What Changed

5.2 Management System — The certificate issuer shall have a **documented** management system.

NOTE 1 — A certificate program management system is how a certificate issuer organizes itself to ensure it conforms with all requirements of this standard practice and meets its established objectives. While quality procedures are an important element, the organization’s full set of processes and documentation (documents—including objectives, policies and procedures—and records) all comprise a management system.

◆ What This Means

You need to **demonstrate** a formal, documented system that:

- Ensures compliance with the standard
- Includes policies, procedures, objectives, and records

ANAB is clarifying that even if you’re small, you need *some written system*.

✔ Recommendations

✔ Create a **Management System Manual** (even just 5–10 pages) that lists:

- Policies (e.g., refund policy)
- Objectives (e.g., pass rate goals)
- Procedures (e.g., issuing certificates)
- Record retention plan

✔ Make sure it's **accessible** to staff.

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✔ One PDF or Word document with headings:

- Policies
- Objectives
- Procedures
- Records

3 Documentation (5.2.1.2)

◆ What Changed

5.2.1.2 The certificate issuer's certificate program management shall document and implement policies and procedures for the certificate program. These policies and procedures shall be fair and equitable and comply with all applicable regulatory and statutory requirements and legal obligations.

◆ What This Means

You must **document** and *implement*:

- Policies & procedures
- Ensure they are **fair and equitable**
- Comply with all relevant laws

This change is meant to enforce **formalization** and **consistency**.

✔ Recommendations

✔ Write down all policies:

- Refunds
- Appeals
- Complaints
- Assessment security

✔ Write procedures:

- How you issue certificates
- How you handle complaints

✔ Include a statement of fairness and legal compliance.

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✔ Have **one document** with:

- Policies
- Procedures
- "We comply with all applicable laws."

✔ Sign and date it.

Documentation – Policies (5.2.1.3)

◆ What Changed

5.2.1.3 There shall be **policies** to address, at a minimum, the following:

- (1) Advisory group composition and responsibilities
- (2) Nondiscrimination
- (3) Fees, cancellations and refunds
- (4) **Use of technology-enabled automation, including artificial intelligence**

(New Item 4 was added)


◆ What This Means

You *must* now have a **written policy** on:

- Technology and automation (including AI)
- How it's used in your process


This is to ensure transparency and fairness.

Recommendations

 Add to your policy manual:

- "We use technology/AI only to assist, not replace, human evaluation where required. We ensure all technology use complies with fairness, accessibility, and privacy requirements."
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 Add **one line** to your policies:

"We ensure fair, transparent use of AI and technology."

5 Documentation – Procedures (5.2.1.4)

◆ What Changed

5.2.1.4 There shall be **procedures** outlined to address, at a minimum, the following:

- (1) Certificate issuance and use
 - (2) **Designation issuance and use**
 - (3) Invalidating a certificate
 - ...
 - (9) **Accommodations**
 - (10) **Financial controls**
 - ...(other items unchanged)
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◆ What This Means

ANAB *added* required procedures for:

- Designation issuance & use
- Accommodations (e.g., for learners with disabilities)
- Financial controls

You **must** document *how you handle these*.

✅ Recommendations

✓ Add procedures for:

- Designations (if applicable)
 - Approving accommodations
 - Managing financial controls (segregation of duties, audits)
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✓ Add 3 bullet points to your procedures document:

- “Designation: record and issue designations per criteria.”
- “Accommodations: respond to disability requests fairly.”
- “Financial controls: track income/expenses; dual signers for accounts.”

6 Documentation – Note 2 (Clarification)

◆ What Changed

NOTE 2—All required policies and procedures should be addressed in the certificate issuer’s documentation even if they seem to not be applicable. As an example: If the certificate issuer does not issue a designation, a statement under a combined certificate and designation issuance and use procedure could indicate that “No designation will be granted to certificate holders.”

◆ What This Means

You can't *skip* items you think "don't apply."

Instead, **explicitly state** that they are not used.

✔ Recommendations

✔ In your documentation, write:

- "We do not offer designations at this time."
 - ✔ For any other “N/A” item, write a line explaining it's not used.
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✔ Add “N/A” explanations to your policies.

7 Management Review (5.2.6.3)

◆ What Changed

5.2.6.3 The input to the management review shall include, at minimum:

...

(8) **Progress towards objectives**

(9) Follow-up actions from previous management reviews

(Item 8 is new)

◆ What This Means

You now **must** review and document progress toward objectives.

✓ Recommendations

✓ Add to your annual review template:

- Objectives for the year
- Status/progress
- Plans to improve

✓ Discuss and record decisions.

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✓ Add **one line** to your review notes:

“Progress toward objectives: [notes]”

Personnel (5.3.7)

◆ What Changed

5.3.7 The certificate issuer shall have current contracts or agreements with personnel that clearly specify the responsibilities assigned and include provisions to ensure confidentiality, impartiality (**including but not limited to conflicts of interest**) and security of assessment materials.

(new phrase in bold)

◆ What This Means

ANAB now requires your agreements/contracts with **personnel** to **explicitly** cover:

- Conflicts of interest (not just general impartiality)
- Security of assessment materials

You need **written agreements** that show staff understand these responsibilities.

Recommendations

✓ Update employment / contractor agreements to include:

- Confidentiality commitment
- Clause on avoiding conflicts of interest
- Commitment to protect assessment security

✓ Review existing agreements for gaps.

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✓ Add **1 paragraph** to contracts:

“I agree to maintain confidentiality, avoid conflicts of interest, and protect the security of all assessment materials.”

Financial Management (5.4.1, 5.4.1.2)

◆ What Changed

NOTE 4 — Examples of financial stability documentation include annual audited (or unaudited) financial statement, balance sheet, income statement, letter of financial support from a parent organization or a grant-providing organization.

5.4.1.2 The certificate issuer shall **implement financial controls as preventive measures against errors, fraud and theft.**

NOTE 5 — Examples of financial controls include reconciliation of bank statements, bank access limitations, designated signers for checks and digital payments, and keeping business and personal accounts separate.


◆ What This Means

Beyond showing **financial stability**, you must:


- Have **documented financial controls**
- Use them **to prevent fraud and errors**
- Include them in your policies

ANAB is stressing **practical, preventive measures.**

Recommendations

 Document your financial controls:

- Monthly bank reconciliations
- Separate personal/business accounts
- Two people sign large payments

 Add this section to your policies.

 Keep simple records (e.g., checklists) showing you follow them.

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 Add **3 bullet points** in your policies:

- Reconcile bank statements monthly.
- Keep business and personal accounts separate.
- Require dual signers on checks.

1 0 Outsourcing and Commercial Support (5.6.1.1, 5.6.2)

◆ What Changed

5.6.1.1 The certificate issuer shall have current contracts or agreements with contractors that clearly specify the responsibilities assigned and include provisions to ensure confidentiality, impartiality (**including but not limited to conflicts of interest**) and **security of summative assessment materials**.

5.6.2 The certificate issuer shall not outsource (1) the establishment of the requirements to earn the certificate nor (2) the determination of if a learner has met the requirements to be issued the certificate.

NOTE 6 — If the certificate issuance is automated through the use of a learning management system, that is not considered outsourcing of the determination. However, the requirements of 5.6.1 apply.

◆ What This Means

For **contracts with vendors** (e.g., proctors, LMS providers):

- Must include confidentiality, impartiality (**including conflicts of interest**), and security of assessment materials.

You **cannot outsource**:

- Deciding what learners must do to earn the certificate
- Deciding if a learner passed

You can use an LMS to *deliver* and *record*, but not to *decide* pass/fail *without your oversight*.

✓ Recommendations

✓ Vendor contracts must include:

- Confidentiality terms
- Impartiality with conflicts of interest
- Security for assessment materials

✓ Review your LMS or service providers:

- Ensure final certification decisions remain with you.

✓ Document who decides:

- Requirements

- Who reviews results
-

 ***Let's Keep It Simple***

- ✓ Add **1 paragraph** to all vendor contracts:

“Vendor agrees to maintain confidentiality, avoid conflicts of interest, and protect the security of all assessment materials.”

- ✓ Make sure YOU sign off on final pass/fail results.
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1 1 Instructional Design Plan (6.1.2)

◆ What Changed

6.1.2 The certificate program instructional design plan shall include, at minimum:

...

(3) How the certificate issuer initially ensured and will continue to ensure **certificate program design is consistent with its stated purpose, target audience, and scope;**

(4) How the certificate issuer initially ensured and will continue to ensure **the alignment of the intended learning outcomes, course learning activities, and the summative assessment(s);**

NOTE 7 — Alignment occurs when what is intended to be taught (intended learning outcome) matches the learning activities (e.g., watching a video, role-playing, problem-solving) and is appropriately checked during the summative assessment. For example, if an intended learning outcome specifies a task can be performed, the learning activity and the summative assessment should have learners perform the task.

◆ What This Means

Your instructional design plan must now **document**:

- How you ensure the program's design matches purpose/audience/scope
- How learning outcomes, activities, and assessments **align**

This pushes you to show **intentional design**.

✓ Recommendations

✓ Add to your Instructional Design Plan:

- Purpose & target audience section
- Learning outcomes table
- Mapping of outcomes → activities → assessments

✓ Include notes on:

- How you verify they stay aligned over time
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✓ Add a **simple table**:

Outcome	Activity	Assessment
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Example: Safe serving Video + discussion Quiz

1 2 Certificate Requisites (6.1.3.2)

◆ What Changed

6.1.3.2 The certificate requisites shall be **consistent** with the program purpose, **target population**, scope, and intended learning outcomes.

NOTE 9— Examples of ongoing requirements within the certificate term include continuing education, continued employment and compliance with a code of conduct. Since certificate programs do not have ongoing requirements, once a certificate is issued it is never revoked. However, it is appropriate to refer to one as 1) active or inactive or 2) current or expired. For illustrative purposes: If the certificate term is for life, then an individual would hold an active/current certificate for life. However, when the certificate has a time-limited term, an individual who does not renew the certificate by meeting the current requisites would have an inactive/expired certificate after the term ends.

◆ What This Means

Your **requirements to get the certificate** must:

- Match program purpose, audience, scope
- Be clearly defined and **documented**

ANAB also clarifies language for certificates:

- Use “active” vs. “inactive/expired”
 - Avoid calling revoked when requirements aren’t ongoing
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✔ Recommendations

✔ Review your marketing and certificates:

- Make sure the target audience and purpose match the requirements

✔ Update wording:

- Use “active/inactive” instead of “revoked” if there are no ongoing requirements

✔ Document requirements in course materials.

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✔ Add **1 line** to policies:

“Requirements match program purpose and target audience.”

✔ Change certificates: "Valid until [date]" or "Expires [date]"

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