

1.0 PURPOSE

1.1 This document covers the temporary processes put in place by the Nadcap Management Council (NMC) and PRI to respond to the COVID-19 situation.

2.0 APPROVAL

2.1 The NMC met on 30-31 March, 2020 to review this response and approved it via email on 3-6 April, 2020.

2.2 The NMC met on 01-Dec-2020 to revise this response and incorporate Risk Assessment Surveys and Virtual Verification Audits. The NMC approved this revision via email on 15-18 December, 2020.

3.0 APPLICABILITY

3.1 These changes temporarily supersede existing Operating Procedures until rescinded by the NMC.

4.0 RESPONSE

4.1 Nadcap Meetings and Auditor Conferences

4.1.1 The health and safety of all Nadcap meeting and Auditor Conference attendees is the most important aspect and will govern the decision process regarding conducting face-to-face meetings. If the decision is made to not hold face-to-face meetings, every effort will be made to hold meetings online.

4.1.2 Nadcap meetings and Auditor Conferences are being evaluated on a case by case basis considering COVID-19 travel restrictions and other factors to determine the feasibility of a face-to-face meeting.

4.1.2.1 Decisions will be communicated to all stakeholders.

4.1.2.2 The NMC has made the decision during the October 2020 Nadcap Meeting to reduce the 2021 and 2022 Nadcap meeting schedules to two face-to-face meetings annually. Virtual meetings will be utilized in place of a third in-person meeting for 2021 and 2022.

4.2 Audit Response Deadlines and Cumulative Delinquency

4.2.1 Auditees having trouble responding to audits in a timely manner must communicate with PRI Staff Engineers.

4.2.2 Nadcap will continue to follow current procedures regarding response due dates (which do not allow extensions for responses).

4.2.3 Task Groups are directed to consider waiving delinquency requirements related to failure and merit for those audits impacted by COVID-19.

4.3 External Service Providers

-
- 4.3.1 Auditees may be experiencing difficulty with external service providers (e.g. calibration, personnel qualification) maintaining some certifications to meet requirements.
- 4.3.2 Auditees should perform analyses of their own systems to determine where issues with external service providers may arise so that proactive measures can be taken prior to the audit.
- 4.3.3 Subscribers should review their specification requirements and processes for granting deviations as many Auditees will likely be seeking deviations. Acceptable allowances and processes for granting deviations should be proactively developed and communicated to Auditees.
- 4.3.4 Specification Requirements
- 4.3.4.1 Nadcap does not have the authority to grant deviations to specification requirements.
- 4.3.4.2 When external service provider issues relate to specification requirements, Auditees must address potential deviations with each customer/Subscriber.
- 4.3.4.3 Upcoming Audits
- 4.3.4.3.1 Nadcap will not write an NCR if the Auditee has an approved specification deviation from the customer/Subscriber design authority prior to the audit.
- 4.3.4.4 Audits in Review
- 4.3.4.4.1 Nadcap will accept newly approved deviation requests as an immediate corrective action.
- 4.3.4.4.2 Additional corrective actions may also be necessary to address the root cause.
- 4.3.5 Nadcap Audit Criteria Requirements
- 4.3.5.1 Where Audit Criteria (Nadcap checklists) define standard frequencies that are not specification requirements, the NMC is directing Task Groups to define temporary allowances to deviate from these requirements related to external service provider issues.
- 4.3.5.2 The Task Group may require additional actions (to mitigate the risk) to accept these deviations.
- 4.3.5.3 Upcoming Audits
- 4.3.5.3.1 Where the Task Group has allowed temporary deviations, Nadcap will not write an NCR when the issue is due to an external service provider, assuming that any other required actions are also taken.
- 4.3.5.4 Audits in Review

-
- 4.3.5.4.1 The immediate corrective action should include a plan for becoming compliant when possible.
- 4.3.5.4.2 Additional corrective actions may also be necessary to address the root cause.
- 4.3.6 Auditee-Defined Frequency Requirements
- 4.3.6.1 Where the Auditee has discretion with the frequency of the action (i.e. no customer specification or Nadcap audit criteria requirement), it is recommended that Auditees demonstrate appropriate internal approval for temporary deviations due to external service provider issues in order to avoid receiving nonconformances.
- 4.3.6.2 The process for internally approved deviations is at the discretion of the Auditee.
- 4.3.6.3 Upcoming Audits
- 4.3.6.3.1 If the Appropriate approvals are in place and documented, NCRs will not be written.
- 4.3.6.4 Audits in Review
- 4.3.6.4.1 A documented internal approval to deviate will be acceptable as an immediate corrective action.
- 4.3.6.4.2 Additional corrective actions may also be necessary to address the root cause.
- 4.4 Quality Management Systems
- 4.4.1 While the International Aerospace Quality Group (IAQG) and many ISO/IEC 17025 accreditation bodies are taking actions to lessen the impact on quality system certifications/laboratory accreditations, this does not ensure that these certifications and accreditations will not expire. Normally this would result in actions being taken against Nadcap accreditations, however, current procedures allow the NMC to approve not suspending or withdrawing Nadcap accreditation when quality systems are expired.
- 4.4.2 The NMC has approved that no action will be taken on Auditees that have had their 91XX certification or ISO/IEC 17025 accreditation expire due to current circumstances.
- 4.4.3 This may need to be re-evaluated depending upon the duration of the COVID-19 situation.
- 4.4.4 PRI will continue to monitor all expired quality system certifications to ensure that they ultimately become certified.
- 4.5 Expiring Accreditations

-
- 4.5.1 Many Auditees are or will be in danger of having their accreditation expire prior to a new accreditation being issued. Current procedures allow PRI Staff Engineers to grant extensions up to three months with additional extensions requiring Task Group approval.
- 4.5.2 The NMC has approved a plan to allow PRI Staff Engineers to grant extensions in three-month intervals, not to exceed a total of twelve months (i.e. each accreditation extension issued will be less than or equal to 3 months).
- 4.5.2.1 Future reaccreditation audits shall not be conducted in the same or consecutive eligibility quarters due to accreditation extensions. If the extension length is zero to three months less than the future accreditation length (i.e. a nine or twelve month extension with a future accreditation length of twelve months), the time granted as an extension will be borrowed across the next two accreditations instead of against only the next accreditation.
- 4.5.3 Completion and approval of a t frm-1114 Risk Assessment Survey is required for each extension after the first three-month extension for any accreditations where the next audit has not yet been conducted prior to the current expiry date.
- 4.5.3.1 A t frm-1114 Risk Assessment Survey is not required to allow extensions related to audit responses for on-site audits that have already been conducted. Extensions to allow completion of audit review for audits that have already been conducted may be granted by the Staff Engineer.
- 4.5.3.1.1 These extensions may exceed the maximum total of twelve months if progress is being made in the audit review process.
- 4.5.3.2 A separate t frm-1114 Risk Assessment Survey must be submitted for each facility requiring accreditation (e.g. a main and a satellite facility will each require their own t frm-1114 Risk Assessment Survey).
- 4.5.3.2.1 All Task Groups requiring an extension may be included in the same t frm-1114 Risk Assessment Survey for a given facility.
- 4.5.3.3 The Auditee shall submit the completed t frm-1114 Risk Assessment Survey to the extensionrequest@p-r-i.org email address at least 21 days prior to the current expiration date.
- 4.5.3.3.1 Surveys submitted after the deadline of 21 days prior to the expiry day may result in an accreditation lapse prior to an extension being granted.
- 4.5.3.4 Only extension requests and t frm-1114 Risk Assessment Surveys received less than three months from accreditation expiration will be reviewed and considered.
- 4.5.3.5 The Staff Engineer shall review the completed t frm-1114 Risk Assessment Survey and make a determination on whether an extension is granted, a

-
- Virtual Risk Assessment is required, or a Task Group decision is necessary based on risk criteria developed by the NMC.
- 4.5.3.5.1 A Virtual Risk Assessment is a follow-up conversation between the Staff Engineer and Auditee to provide clarification on the responses provided as part of the t-frm-1114 Risk Assessment Survey and mitigation activities the Auditee has conducted to minimize these risks.
- 4.5.3.6 If a Task Group decision is required, the Task Group shall review the completed t-frm-1114 Risk Assessment Survey and make a determination of whether an extension is granted, a Virtual Risk Assessment is required, or the accreditation expires.
- 4.5.3.6.1 Interim extensions may be granted as necessary until a Task Group decision can be reached.
- 4.5.4 If twelve months of extension are granted and an on-site audit can still not be conducted, up to twelve months of Accreditation Adjustments may be granted in three-month intervals through successful completion of Virtual Verification Audits.
- 4.5.4.1 A Virtual Verification Audit is not required for on-site audits that have already been conducted. Extensions to allow completion of audit review for audits that have already been conducted may be granted by the Staff Engineer.
- 4.5.4.1.1 These extensions may exceed the maximum total of twelve months if progress is being made in the audit review process.
- 4.5.4.2 Accreditation Adjustments shift the eligibility quarter of the audit but any borrowed time from Accreditation Extensions granted must still be taken from the future accreditation.
- 4.5.4.3 Virtual Verification Audits are conducted as a one-day audit performed remotely by the Auditor.
- 4.5.4.3.1 Virtual Verification Audits shall be scheduled as Add Scope audits in eAuditNet.
- 4.5.4.3.2 Task Groups shall define the requirements for what is reviewed during a Virtual Verification Audit.
- 4.6 Export Controlled-Restricted Rules
- 4.6.1 Current procedures require that when an audit can potentially include restricted technical data (data restricted by US export control regulations), an unrestricted auditor must conduct the audit except under rare circumstances.

- 4.6.2 The NMC has approved that restricted auditors may temporarily be used for these audits provided there is enough non-restricted work to be reviewed.
- 4.6.3 Restricted auditors are still not authorized to view restricted technical data.
- 4.6.4 This is being done to allow in-sector auditors to conduct audits wherever possible, however these allowances still require Nadcap Director approval and will remain limited.
- 4.7 Emergency Processes
- 4.7.1 It is important for the Nadcap program to be prepared if a situation like this arises again.
- 4.7.2 An NMC sub-team with PRI Staff has been working to develop processes and procedures to address future emergency situations.
- 4.7.3 These processes and procedures may be used for the current COVID-19 situation but will also be available for any future situations.
- 4.8 Additional Actions
- 4.8.1 Where changes to a procedure are required, these changes will be expedited so that the changes may be implemented as soon as possible.
- 4.8.2 PRI will continue to closely monitor all activities associated with Nadcap.
- 4.8.3 Additional actions or changes to the above actions may be needed as the situation evolves and will be communicated to all stakeholders.

5.0 DOCUMENT REVISION HISTORY

Revision Date	Summary
07-Apr-2020	Covid-19 emergency response plan developed by the NMC to document deviations being taken from standard operating procedures to facilitate the program
06-Jan-2021	Update to introduce Risk Assessment Surveys and Virtual Verification Audits; Nadcap Meeting plan updated