

COVID-19 Alleviations - Frequently Asked Questions (FAQ) Log

Revision: November 24, 2020



Applicable to all ICOP Scheme Requirements:

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Change Summary – Description of the changes for this version of the IAQG OPMT COVID-19 Alleviations - Frequently Asked Questions (FAQ) Log:

- FAQs #3, #8, #17, and #31 were updated to align the IAQG OPMT Novel Coronavirus - COVID-19 Notice dated November 24, 2020.
- FAQs #24 and #35 were replaced with new questions aligned with the IAQG OPMT Novel Coronavirus - COVID-19 Notice dated November 24, 2020.

Open FAQs:

FAQ Number	Question	Answer
1	If and when a CB determines that there are activities/processes that cannot be audited remotely, for example Production, and the CB is completing a recertification audit, can the CB still issue the new 3 year certificate when the CB did not audit all activities and processes or is this a certificate to identify IAF-ID3?	Yes, however CBs are encouraged to think outside the box and not just dismiss these clauses as not being auditable. There are tools such as video chat and streaming that could help an auditor see product realization activities. There could be client access issues and concerns, but CBs must gather sufficient information to support the conclusion that the certificate should be maintained. The certificate issued after the recertification audit decision does not need to have [IAF-ID3] appended to the certificate number.
2	If a CB determines it cannot audit all activities during a surveillance or recertification audit, can the CB shorten the audit duration for that audit since the CB is not auditing everything and then simply add duration to the 2021 surveillance or recertification audit?	The audit duration can be shortened but the reduced audit duration must be justified and the calculation methodology included in the risk analysis provided to the AB, unused audit duration must be moved to next surveillance or recertification audit and the activities that were not audited must be included in the audit plan..
3	Can ICT be applied to a Stage 1 initial audit?	Yes. Stage1 audits for initial AQMS certification can be performed remotely in accordance with IAF MD4:2018 subject to acceptance from the accrediting AB and in accordance with the requirements set out in the IAQG OPMT Novel Coronavirus - COVID-19 Notice dated November 24, 2020.
4	Can ICT be applied to a transfer special audit?	Yes. An alleviation has been granted in the Notice to ABs and CBs dated March 25, 2020. Certification transfer activities must be included in the risk analysis plan submitted to the accrediting AB.
5	ASRP is not addressed in the IAQG OPMT Notices for COVID-19. Does this mean that if a CB conducts a remote audit in 2020, the processes that were not covered need to be audited in 2021 instead of the established schedule for the audit program?	Yes, the same rules apply to ASRP; unused audit duration must be moved to next surveillance or recertification audit and the activities that were not audited must be included in the audit plan
6	Is it still required that all clauses of the applicable AQMS standard (except requirements determined as not applicable within the determined scope) and the organization's processes that are part of the QMS be audited during the surveillance audits within one certification cycle since some activities can apparently be pushed back to 2021?	Yes, all clauses must be audited. That requirement has not changed.
7	What does a CB do when a company or facility is unwilling to share data on-line or through an ICT audit for a variety of reasons (such as perception of proprietary information, corporate policy, etc.)?	Certificate suspension may be required at year end 2020 (or after 18 months from the certification decision date for the first surveillance of a new certification) or withdrawal at certificate expiry whichever is first.
8	Do initial certification Stage 2 audits have to be done fully on-site or can a CB use ICT for some % of the audit duration and issue the certificate once the remaining audit duration is completed on-site?	There are alleviations for stage 2 initial certification audits. The use of RAFA process is required in accordance with the IAQG OPMT COVID-19 Notice dated 24 November 2020. All other ICOP scheme rules apply.

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9	<p>What does a CB do about a facility that is in any form of 'lockdown' where all the employees are dispersed to their homes? Does the audit team audit the Quality Director and President on clauses 4, 5, 6, 9 and 10 for a few hours then defer the rest of the audit to the following year?</p> <ul style="list-style-type: none"> At what point in time is it no longer a viable audit? Is there any difference for surveillance 1, surveillance 2, re-certification audits? 	<p>It depends. This scenario is very specific and such scenarios should be evaluated with CB audit planning actions determined on a case-by-case basis. At some point CBs need to evaluate the level of available audit information and what is needed to support their certificate decision.</p>
10	<p>Doing a full re-certification audit with 100% off-site auditing for a company with lots of manufacturing processes where there is no ability to have cameras in the production area etc. is very challenging especially without both customer and auditor buy in. What guidance and direction can be provided on what can and what cannot be done off-site given the level of ICT available, complexity of processes, products, etc.?</p>	<p>Each CB and Lead Auditor will need to assess the objective evidence that can be obtained and determine if it is sufficient to support the audit conclusion and maintenance of the certification. Each access situation and audit may be unique. CBs can always set stricter rules based on the situation. CBs should refer to IAF MD 4 for further requirements for conducting audits using ICT.</p>
11	<p>Are the annual requirements (purchasing, interview with top management, etc.) being waived if it is determined that they cannot be audited remotely?</p>	<p>No.</p>
12	<p>Are there going to be contingencies for an update to OASIS software to avoid that all those companies that have their cert expire. Can we stop that?</p>	<p>No change to OASIS is needed, certificates will expire. The IAQG OPMT OASIS team has provided guidance on appending [IAF-ID3] to the certificate number in OASIS and the processes for restoration and reinstatement of certification.</p>
13	<p>The capture of remote audit evidence in OASIS could be useful if the system can for example accommodate downloads, video, images, interviews etc. Is this possible?</p>	<p>No need to capture nor record in OASIS the evidence of conducting the remote audit (e.g., video files). CB auditors should make reference to the objective evidence collected.</p>
14	<p>Is there any relief on shift coverage?</p>	<p>No.</p>
15	<p>Can a pre-assessment (an assessment completed before the start of the initial certification audit) be completed remotely?</p>	<p>Yes.</p>
16	<p>Can an initial certification audit Stage 1 for 9120 be completed remotely?</p>	<p>Yes, there is no change to the existing requirements.</p>
17	<p>Can a CB perform up to 100% of surveillances and recertification audits remotely?</p>	<p>Yes, during this IAF-ID3 situation. This is subject to change.</p>
18	<p>Have the requirements for 'restoration' within 6 months of certificate expiry been expanded to 12 months after expiry?</p>	<p>Yes. The temporary alleviation between 6 months and 12 months after expiry is called 'reinstatement'.</p>
19	<p>Has the requirement to conduct the first surveillance audit within 12 months of the certification decision and the first surveillance been expanded?</p>	<p>Yes. The temporary alleviation allows the first surveillance to be conducted within 18 months of the initial certification decision.</p>
20	<p>Can a CB that determines that some processes/activities on audits cannot be audited remotely defer the audit of those processes/activities until the 2021 audit?</p>	<p>Yes, but all processes/activities must be audited to some extent. Please also refer to FAQ 2.</p>
21	<p>Does the 90-calendar day extension for NCR verification also extend to the root cause and corrective action (RCCA) plan acceptance or containment actions?</p>	<p>Yes. However, it is a single 90 day extension and not additive at each stage of RCCA processing.</p>

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22	Where a recertification audit and certification decision cannot be completed before certificate expiry, does the certificate number have to be changed to add a temporary identification number [IAF-ID3] in OASIS?	Yes. Certificates that expire or have expired due to issues associated with COVID-19 shall have a unique identification number [IAF-ID3] appended to the certificate number in OASIS.
23	If it is not possible to start a recertification audit and the current certificate expires, how can the supplier get back to a certified status.	After expiry, AQMS certificates may be reinstated by utilizing a reduced initial certification audit in OASIS, without a stage 1 audit, using recertification audit criteria and audit duration.
24	Can 100% remote auditing be used to support initial Stage 2 audits?	Yes, when the CB follows the requirements and RAFA process defined within the IAQG OPMT COVID-19 notice dated November 24, 2020.
25	How is the audit time used for ICT based audits to be recorded in OASIS?	The IAQG OPMT OASIS Database Update Communication for COVID-19: OASIS Database Instructions contains details of how to record the on-site and off-site audit duration. The CB Audit Entry Admin has to set up the audit parameters in the 'Supplier Sites & Audit Visits' section of the audit planning to state the correct on-site and off-site days. Use of ICT is to be recorded as off-site audit time. In the OASIS 9101 Form 5 Audit Report, the lead auditor will need to record the on-site time less the time allocated to audit using ICT. In some cases, this will mean the on-site audit time recorded in the OASIS 9101 Form 5 Audit Report will be "0".
26	How long will the IAQG OPMT COVID-19 alleviations be in effect?	The alleviations will remain in effect until further notice. In accordance with IAQG OPMT Resolution #157, "The OPMT will continually evaluate conditions and provide updated communications as this event progresses".
27	When it becomes possible to re-start on-site auditing what is the expectation on CB's?	It is expected that CBs will start to change audit planning as soon as reasonably possible after travel and on-site auditing becomes possible.
28	Can a transfer audit (including stage 1 and stage 2) be completed remotely when the certificate is expiring within 12 months?	The Special audit for transfer including "Stage 1" and "Stage 2" can be completed using ICT when the risk of issuing the transferred certification is acceptable. Audits linked to the subsequent recertification activity can also be completed remotely. Please note however that issuing a new 3-year certificate would represent significant risk to the CB (i.e. issuing a certificate when the client has never been visited) and the AB might challenge the certification decision based on a lack of objective evidence to support the conclusion. The transferred certificate in OASIS should expire and it would need to be appended with the code [IAF ID 3] before re-instatement.
29	Does a CB have to get approval to do any transfer audit off-site?	The published notice states that you must include transfer activities in your plan to the accrediting AB. Please defer to your AB to determine if they want to evaluate each case or simply want you to provide notice.
30	If the recertification audit was started prior to certificate expiration and the certification decision occurs within 6 months of the expiration date (i.e., IAF ID 3 - Restoration), can the current certification period be extended beyond the original three-year certification cycle (i.e. no expiration status in OASIS)?	No, the current certification period must not be extended beyond the current three-year certification cycle. If the current certificate expires, the certificate status in OASIS will be listed as "Expired" until the restoration process is completed, or additional time is used to re-instate the certification per the IAQG OPMT COVID-19 Notification.

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31	Can a special audit using ICT be performed for any of the following? <ul style="list-style-type: none"> – a change in scope or the number of sites? – in response to a customer request or feedback when an issue has been identified? 	CBs should use risk assessment and their best judgement in customer request or feedback situations to determine if an on-site audit is needed or if auditing using ICT is appropriate. Reference IAQG OPMT COVID-19 Notice dated November 24, 2020.
32	Does the alleviation for a 90-calendar day extension for nonconformity verification also apply to AB issued nonconformities to CBs?	Yes, However, it is a single 90-day extension and not additive at each stage of RCCA processing.
33	My CB has suspended all audit activities during the COVID-19 crisis. Is my certificate still valid?	The issued certificate remains valid so long as the annual surveillance audit is completed by the end of 2020. If the recertification audit is not completed the certificate will expire.
34	If a CB generates an initial certification audit file in the OASIS database to support reinstatement of a certificate within 12 months of expiry, is the certified client's previous audit history deleted once the initial audit is published?	The previous audit history will remain in the OASIS database provided the site OIN does not change and the previously entered audit data is not deleted by the CB.
35	Can 100% remote auditing be used to support Special Audits linked to expansion of a site or scope of certification.	Yes, when the CB follows the requirements and RAFA process defined within the IAQG OPMT COVID-19 Notice dated November 24, 2020.
36	Does the IAF ID3:2011 six-month certificate extension period noted below apply to AQMS certification? "3 c) Recertification Audits Normally the recertification audit must be completed, and the recertification decision made prior to expiration to avoid loss of certification (ISO/IEC 17021:2011, 9.1.1.2). However, providing that sufficient evidence has been collected as above, to provide confidence that the certified management system is effective consideration may be given to extend the certification for a period not normally exceeding 6 month beyond the original expiry date."	No. The statement is not applicable for AQMS certifications. There is no alleviation that allows for a six-month extension.
37	Once it has been determined that the cause of certificate expiration is related to a COVID-19 issue and the certificate restoration or reinstatement process will be used; should a CB append the certificate number with the [IAF-ID3] indication?	Yes, CBs should initiate a certificate modification and append the certificate number with the [IAF-ID3] indication. This will support customer or other party (e.g. NADCAP) awareness of the cause for expiration.
38	Can a CB issue a certificate if it determines that some processes or activities cannot be audited remotely during a recertification audit?	All requirements must be audited to some extent during the recertification audit. The CB has to determine if the objective evidence obtained during the audit is sufficient to make an informed recertification decision with respect to the applicable requirements and the scope of certification.
39	Can an auditor have remote audits witnessed for the purposes of authentication as an AEA?	Remote auditing can be used for the purposes of authentication except when witness audits are required by 9104-3 Table 1 and Table 2 auditor evaluation criteria.

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40	What is the status of a certificate that expires due to COVID-19 related issues and the certificate number in OASIS has been appended with [IAF-ID3]?	The certificate status is 'Expired'. This means that it is no longer a valid certificate. The appending of [IAF-ID3] is awareness to help customers understand that the reasons for expiry are linked to COVID-19 related issues and re-certification activities are being managed by the CB in accordance with IAF ID3. CBs should follow their accredited processes (ISO/IEC 17021-1) in relation to expired certificates, including any requirements relating to use of marks and logos.
41	When an audit is split into 2 or more parts, due to the COVID-19 situation, if one part is conducted as a remote audit and another part is conducted at a later date (either physically on site or as a remote audit) how should the audit duration be accounted for and when should the audit be published in the OASIS database?	There are two possible answers to this question as follows: 1) If the part of the audit that is to be conducted at a later date is scheduled after the end of the surveillance year or in the first audit after recertification, the audit should be completed and published in the normal way. The audit duration not completed during the audit should be documented in the audit report and added to the audit duration of the next audit. 2) If the part of the audit that is to be conducted at a later date is scheduled before the end of the surveillance year or before certificate expiry, the CB can use the 'Partial Audits' system available in the OASIS database to publish each part of the audit as it occurs. The publication of the last part of the audit will complete the audit in the normal way.
42	How does an OP Assessor record the use of an Audit Report Review as an alleviation in OASIS?	The OPMT would recommend the following statement be included within the "Results" section and in the "General Conclusions, Remarks, and Recommendations" text field of the OASIS oversight record: <i>"The Sector Management Structure (SMS) or Certification Body Management Committee (CBMC) has authorized the use of an audit report review for this assessment, in lieu of conducting a full witness audit. This alleviation is authorized by the "Management of Extraordinary Events or Circumstances Affecting ABs, CBs, and Certified Organizations - Novel Coronavirus - COVID-19" notice and the authorizing IAQG OPMT Resolution #157."</i>

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