



**International Aerospace Quality Group
Other Party Management Team**

November 24, 2020

NOTICE:

**Management of Extraordinary Events or Circumstances:
Novel Coronavirus - COVID-19**

The IAQG Other Party Management Team (OPMT) accepts that the impact of Novel Coronavirus - COVID-19 is an extraordinary event potentially affecting AQMS certified organizations. Our intention is to work with Certification Bodies (CBs), Accreditation Bodies (ABs) and other participants to ensure that the ICOP scheme does not adversely impact industry stakeholders at a time when they are dealing with this difficult situation. This notice is issued and updated under the authority of IAQG OPMT Resolution #157.

The IAQG OPMT greatly appreciates the continuing efforts of all stakeholders to address the current situation. The IAQG remains committed to ongoing communication and will provide updates to this notice as they are needed.

1.0 Introduction

This document sets out requirements for participants within the IAQG Industry Controlled Other Party (ICOP) scheme when they are prevented from conducting activity in accordance with ICOP scheme requirements, as documented in the 9104 series of standards, due to the impact of COVID-19.

This notice has been revised to provide clarity and support additional alleviations linked to 100% remote auditing in accordance with IAF MD 4:2018 including ongoing management of certification activities during this extraordinary event. It replaces the previous “Management of Extraordinary Events or Circumstances: Novel Coronavirus - COVID-19” notice dated 15 October 2020.

2.0 Applicability

This document applies to all participants in the IAQG ICOP scheme. Requirements in this document supersede all previous notices and apply from the date of release until further notice.

3.0 Requirements and Alleviations for Certification Bodies

3.1 CBs shall apply the requirements and alleviations set out in this document where issues associated with the impact of COVID-19 partially or fully prevent a physical on-site audit taking place in accordance with the requirements of ISO/IEC 17021-1, 9104-1 and 9101. The alleviations in this document are not applicable in any other circumstances.

- 3.2 CBs shall review and ensure compliance with all local laws and regulations.
- 3.3 Any CB that is prevented from carrying out planned audits on-site due to this extraordinary event or circumstance shall apply its process for the proper maintenance of certification in accordance with the requirements of IAF Informative Document (ID) 3 and IAQG OPMT Resolution #98.
- 3.4 CBs shall develop a rolling six-month forward-looking risk analysis and associated risk mitigation plan that addresses audit schedules and nonconformity verification activities. The risk analysis and mitigation plan shall address each certified organization affected and shall include:
- An assessment of the risk for continuing certification that includes any deferred audit activities from previous audits, and
 - Documenting the certified organization’s current and expected future situation in accordance with IAF ID 3, and
 - Establishing a reasonable planned course of action for each affected client, and
 - Applying the requirements of IAQG OPMT Resolution #98, and
 - Ensuring that the accrediting AB reviews and accepts the ongoing planned course of action for all clients
- 3.5 CBs shall meet all requirements of ISO/IEC 17021-1, 9104-1 and 9101 for all AQMS certification audits including initial (stage 1 and stage 2), surveillance, recertification and special audits (including special audits in support of transfers) with the exception that audits may use Information and Communication Technology (ICT) for up to 100% of the audit duration. All remote auditing shall be conducted in accordance with IAF MD 4:2018. Initial stage 2 audits and special audits to add sites to an existing certification structure shall include tours of site(s) and the audit of activities within scope using ICT with live video streaming.
- Note:** The IAQG OPMT does not recommend any new certification transfers during this COVID-19 crisis. Certification transfer activities must be included in the risk analysis plan submitted to the accrediting AB.
- 3.6 CBs shall provide a documented notification to their accrediting AB, via OASIS feedback, where remote auditing is to be used in response to an application for:
- A transfer of accredited AQMS certification
 - An initial AQMS certification
 - An extension to technical or geographic scope of AQMS certification
- The documented notification shall include the client name, client reference, number of sites and the expected date of audit.
- 3.7 CBs shall ensure that audit activities that have been deferred from previous audits shall be reviewed and where possible, audited. Audit activities that continue to be deferred shall be treated as a risk to continuing certification. CBs must include mitigation of this risk within the risk mitigation plan.

- 3.8 CBs may also utilize the following alleviations as part of risk mitigation for audits affected by the impact of COVID-19:
- Suspension of certificate due to a planned audit date being missed is not required
 - A 90-day extension may be used for processing nonconformities and re-establishing conformance (9104-1, Clause 8.4). This includes extending the corrective action plan submittal due date, with the exception there is no extension provided for containment timeframes (i.e. 7 days to report and 14 days to reach agreement – 9101, Clause 4.2.4).
 - Certificates that are identified as expiring or expired due to issues associated with COVID-19 shall have the certificate number appended with the following unique number [IAF-ID3]
 - Certificates that have expired shall be eligible for reinstatement until the earlier of either 12 months beyond the expiry date, or, December 31, 2021 provided the certificate number has been appended with the following unique number [IAF-ID3].
 - » Certificates may be reinstated utilizing an initial certification audit in OASIS, without a stage 1 audit, using recertification audit criteria and audit duration.
- 3.9 The following shall apply to all CBs utilizing remote auditing and ICT for initial AQMS certification audits (including stage 1 and stage 2) and AQMS special audits for the extension or reduction of technical and/or geographic scope:
- The CB shall document and maintain a process to collate relevant information, document a Remote Audit Feasibility Assessment (RAFA) or a CB defined technical equivalent and determine the course of action to be taken in response to an application for initial AQMS certification or a change in technical or geographic scope of an existing AQMS certification.
 - The RAFA shall be retained as part of the audit package and shall demonstrate that all the requirements of this document have been addressed before accepting the application and undertaking the initial or special audit.
 - The RAFA shall determine if:
 - 1) the audit is eligible to be conducted on-site.
 - 2) the audit is eligible to be conducted using ICT for more than 30% of the audit duration.
 - The RAFA shall identify any limitations to the remote audit process. Mitigating actions shall be determined, documented, and implemented to ensure the requirements of the audit can be fully met. Where the identified limitations cannot be effectively mitigated, the audit shall be postponed until requirements can be met or, alternately, the application shall be held or denied.
 - The RAFA shall be completed in conjunction with the applicant organization.
 - The RAFA shall address all of the elements set out in Appendix 1.
- 3.10 CB shall not defer audit activities for initial AQMS initial AQMS certification audits (including stage 1 and stage 2) and AQMS special audits for the extension or reduction of technical and/or geographic scope,



4.0 Requirements and Alleviations for Auditor Authentication

- 4.1 Audits conducted using the remote audit alleviation (i.e. audits with more than 30% remote audit content) shall not be used to meet the witness audit requirements as defined within 9104-3 “Requirements for Aerospace Auditor Competency and Training Courses”, Table 1 – 9100 and 9120 Auditor and Aerospace Experienced Auditor Requirements nor Table 2 - 9110 Auditor and Aerospace Experienced Auditor Requirements..
- 4.2 Auditors may use remote audits to fulfil the QMS or AQMS audit experience requirements as defined within the 9104-3 “Requirements for Aerospace Auditor Competency and Training Courses”, Table 1 – 9100 and 9120 Auditor and Aerospace Experienced Auditor Requirements and Table 2 - 9110 Auditor and Aerospace Experienced Auditor Requirements.

5.0 Requirements and Alleviations for Accreditation Bodies

- 5.1 ABs shall review and ensure compliance with all local laws and regulations.
- 5.2 ABs shall apply their process for the proper maintenance of accreditation in accordance with the requirements of IAF Informative Document (ID) 3 and IAQG OPMT Resolution #98.
- 5.3 ABs may utilize remote auditing (IAF ID 12:2015) to support the assessment of CB’s including file reviews.
- 5.4 ABs shall review and provide acceptance of each CBs rolling six-month forward-looking risk analysis and associated risk mitigation plan.
- 5.5 For each CB it accredits, the AB shall witness one complete, remote Stage 2 initial AQMS certification audit where ICT is used for more than 30% of the audit duration as part of its annual assessment program.
- 5.6 A 90-day extension may be used for the processing and verification of AB or oversight nonconformities (9104-1, Clause 5.3.8 and 9104-2, Clause 7.15). This includes extending the corrective action plan submittal due date
- 5.7 Where an AB is not able to complete the assessment activity required by 9104-1, due to restrictions associated with COVID-19, the following shall apply:
 - The AB shall document the deviation or lack of conformance with a 9104-1 requirement and shall develop an action plan that includes a risk analysis for each CB where the assessment requirement has not been met. The risk analysis shall include a review of past performance and activities (e.g. additional witness audits, file reviews) to mitigate the identified risks.
 - There is no requirement to change the accreditation status (e.g. suspension) due to a missed assessment that is linked with this extraordinary event.
 - The risk analysis and action plan shall be submitted to the applicable SMS or CBMC for review and acceptance.



- Once accepted, all risk analyses and action plans shall be provided to the IAQG OPMT Chair for awareness, using OASIS feedback.

6.0 Requirements and Alleviations for ICOP Scheme Oversight Assessments

- 6.1 Other Party (OP) Assessors may utilize remote auditing (IAF ID 12:2015) to support the assessment of CB's including file reviews.
- 6.2 A 90-day extension may be used for the processing and verification of oversight nonconformities (9104-1, Clause 5.3.8 and 9104-2, Clause 7.15). This includes extending the corrective action plan submittal due date
- 6.3 Due to ongoing travel restrictions and the risks associated with COVID-19 each SMS and CBMC shall ensure that remote oversight assessments are conducted whenever possible, in lieu of face to face assessments.
- 6.4 Travel is not authorized for Office Assessments. Other Party (OP) Assessor travel may be authorized for on-site witness audits, as an exception. The requesting OP Assessor, SMS or CBMC Oversight Chair must provide a justified need to the IAQG Executive Committee and must obtain their authorization before travel is started.
- 6.5 The minimum annual shared oversight witness audit for each accredited CB should be accomplished remotely, however if a CB remote witness audit is not possible then the SMS or CBMC shall conduct an audit report review using the 9104-2 Form N check list. When entering the assessment report in the OASIS oversight module, the OP Assessor shall indicate the use of this alleviation.
- 6.6 During annual oversight planning, each SMS and CBMC shall evaluate audit report review results and shall consider increasing the witness audit activity as a risk mitigation action.

Marie-Laurence Petit
IAQG OPMT Chair



Appendix 1: Requirements for a Remote Audit Feasibility Assessment (RAFA) Process

The RAFA process shall address the following:

Remote Audit Eligibility

The rationale for an initial or special audit shall be documented and reason for accepting the application justified by the CB. In determining the rationale and justification, the following shall be considered at a minimum:

- a) Government Policy relating to the unforeseen exceptional circumstances.
- b) Applicant Company Policy relating to the unforeseen exceptional circumstances.
- c) IAQG and ICOP scheme requirements, IAQG OPMT Resolutions and the unforeseen exceptional circumstances alleviations
- d) CB policies and procedures relating to the unforeseen exceptional circumstances and ICT
- e) AB policies and requirements for accreditation
- f) International, National or Local travel restrictions
- g) Risks, such as infection rates or limited infrastructure, and restrictions around the applicant organizations location(s), the locations and travel arrangements for the CB audit team and the CB locations when applicable.
- h) Audit limitations

Audit Performance Capability

The CB shall assess and determine to their satisfaction that:

- a) the applicant organization has the capability to support a fully or partially remote audit, including:
 - 1) the ability to accept a remote or partial remote audit(s) inside their security perimeter / firewall and/or,
 - 2) provide a secure network infrastructure and technical capability to support a remote audit
- b) the audit can be conducted effectively
- c) the audit team will have access to all relevant information in line with the scope of the application, including:
 - 1) the extent to which the applicant organization can securely share documented information including documents and records or other information using ICT rather than transmitting information by e-mail, or similar, to the audit team
 - 2) ensuring that the organization's security and/or confidentiality requirements do not prevent the sharing of essential information by ICT to support the audit.
- d) there will be sufficient objective evidence at the end of the audit to make a certification decision.

In conjunction with the applicant organization, the CB shall assess and determine that appropriate technology and/or platform is available and is sufficiently effective to support the conduct of the audit. This assessment shall address at a minimum:

- a) The platform(s) that the applicant organization has currently implemented that can support a remote audit (e.g. Skype, GoTo Meeting, MS Teams, WebEx, WebEx Gov)
- b) The technology that will be used to conduct the site tour and audit the processes that are carried out physically on site, e.g., manufacturing, MRO, testing, storage and distribution, and

that the technology to be used has the capability to allow the audit team to review the work being carried out and associated documentation.

The CB shall verify the ICT before the remote audit is confirmed and that technology/platform identified is capable, and that the organization's personnel can use it.

Any limitations identified during the audit, while it is being performed remotely using ICT, shall be documented and any further measures or follow up determined and recorded. Any limitations that cannot be overcome shall be reflected in either a reduced scope of certification or the audit not being completed.

Client Operational Assessment

The CB shall assess and determine that the organization's operations can support the scope of the remote audit. This assessment shall consider at a minimum:

- a) The operational status of the organization (e.g. 100% operational, operating at a reduced capacity, non-standard or changed shift patterns, shutdown, furloughed or other arrangements)
- b) When the organization will be able to function sufficiently to support the audit and when will it be fully operational
- c) When the organization will be able to ship products or perform the services defined within the current or requested scope of certification
- d) If the organization is using alternative or temporary manufacturing, MRO, service, and/or distribution sites or processes
- e) If the organization is operating with any concessions or deviations to customer requirements that affect the scope of the audit.

Sample Remote Audit Feasibility Assessment (RAFA)

The following model may be used to document the RAFA process output:



2020-10 Remote Audit
Feasibility Assessment

Note: CBs may use their own technically equivalent documented information,