CERTIFIED ORGANIZATION/CLIENT FREQUENTLY ASKED QUESTIONS (FAQ) COVID-19 ALTERNATE PROCESSES

Don't see your question below? Please contact us at isr-mktg@nsf.org.

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General Questions

1. Are NSF-ISR's auditors forbidden to travel or go on-site?

The NSF-ISR leadership have lifted the suspension on face-to-face audit contact but will continue to utilize remote options to the fullest extent possible to mitigate public health and safety risks, and to comply with social distancing norms and other guidance from regional public health authorities.

On-site audits may be agreed upon by NSF-ISR, the auditor and client where and when feasible, with special consideration given to stay in place orders, travel restrictions, employee safety, and restrictions put in place by our clients and may need to be adjusted as new emerging public health information becomes available at the plant or other regional restrictions. The auditor must verify with the organization prior to beginning travel and each day of the audit. The organization must inform the auditor(s) if any new COVID-19 cases are confirmed, suspected, or exposure at the site:

- Within the two-week window before traveling
- Confirm no cases within two days of audit
- Each day prior to beginning audit
- Any newly confirmed or suspected cases reported for the two weeks after the audit is complete

The notification shall be within 24 hours of the organization becoming aware of the new information.

2. Whom should I contact if I have questions regarding my upcoming audit?

Your account manager can answer any questions about upcoming audits. Please be patient as your account manager's responses may be delayed as we work through this new process.

3. Given the COVID-19 pandemic, we can't have an audit, so how can we keep our certificate?

In accordance with the International Accreditation Forum's Informational Document 3 (IAF ID3), certification bodies are permitted to use alternative audit methods to facilitate audits when "extraordinary events" exist. The global community has recognized the COVID-19 pandemic as an extraordinary event and allowed for certification bodies to be creative in their approach to maintaining the integrity of certificates. These alternative audit approaches differ by industry, scheme and standard, but include the use of remote audits, some relief or flexibility with audit boundaries and, in some cases, certificate extensions.

4. What are the available alternative audit approaches approved by NSF-ISR?

Currently, and depending on scheme/standard requirements, we are evaluating each client's situation and preference. As an output of this evaluation, we have the following available options:

- Audit boundary extension/audit rescheduling: Audits can be moved to later in the year, with the
 hope that shelter in place and other regional orders will have been lifted. Note: Surveillance audits
 may be able to move to later in the calendar year, but recertification audits will be further governed
 by the certificate expiration date.
- Remote auditing: When permitted by scheme/standard, the audit may be completed by information and communication technology, providing a virtual audit option.
- Certificate extension: When permitted by scheme/standard, a remote special audit is conducted to review the backbone of the system and grant a six-month extension to the certificate. Within or before this six-month extension, the recertification audit would be completed on-site or via remote auditing methodologies.

• Partial remote/partial on-site: When permitted by scheme/standard and consider regional restrictions, an audit may be conducted partially remote and partial on-site. Full details of on-site audits are discussed above in #1.

Please note that extensions (boundary or certificate expiry) may include risk of not being completed, if shelter in place restrictions aren't lifted in time for face-to-face audit activity. Should this happen, the account manager will facilitate further discussions of available options.

5. What is a remote audit?

A remote audit is conducted by an NSF-ISR auditor from a location other than the client's site, as if they were on-site. The auditor and interviewed party will interact through a virtual platform/video conferencing/teleconferencing service, as they would if both were at the same location.

A remote audit is not emailing or transferring documentation to the auditor and having them work alone to review it. This process will require active participation from both parties.

6. We prefer a remote audit to be conducted now. What do I need to make that happen?

A certified organization would indicate this preference on its client information form and submit it to the account manager. **At a minimum**, you must be operating and capable of including various process owners/participants and sharing required documentation to complete the audit objectives.

Additionally, a conferencing platform in compliance with your organization's information security and/or export control requirements is necessary to facilitate the remote audit. NSF-ISR cannot provide you with guidance on what platforms meet various requirements, nor do we provide the platform to conduct these audits. There are various suitable programs/platforms, but the demand for these services has significantly increased and there may be a backlog to create an account. It is highly recommended that you obtain an account as soon as you determine the need to pursue a remote audit.

In addition, your organization will need the associated computer infrastructure to facilitate this audit. Examples of this infrastructure include server access, internet bandwidth, office space, microphones, etc.

If multiple auditors are needed/requested, each auditor will require a separate digital workspace (e.g. web conference), and the associated infrastructure support (e.g. different host, increased bandwidth, etc.), since sharing a single meeting impacts the productivity of the audit.

7. What happens if our organization is not eligible for remote auditing?

We will do our best to work with your organization on options on a case-by-case basis. The account manager will facilitate a conversation with the appropriate technical resources to determine the best approach.

8. What happens if our organization is not eligible for extension or remote auditing?

If there is not a possibility to conduct a remote audit, within the required timeline, current requirements dictate actions to be taken on the certificate.

Recertification audit: We are required to withdraw your certificate, effective on the expiration
date, and then plan for a recertification audit to occur within 12 months of your expiration.
Upon completion of this audit, and properly addressing the associated nonconformities, a new
certificate would be issued, and your certification status would be reinstated. Please note, if



- outside of the 12-month window, a new stage 1 and stage 2 audit is required.
- Surveillance audit: Without a 2020 surveillance audit, the certificate would be reviewed for suspension by January 2021.
- First surveillance after initial registration/stage 2: This is required to be performed within 12 months of the initial certification decision, but an additional six months have been allowed (based on COVID-19-related waivers). If the surveillance audit cannot be completed within 18 months of the certification decision, the certificate would be suspended.

9. What if my organization is hesitant about completing a remote audit?

We cannot require your organization to complete a remote audit. There may be another option that works for your organization. Other options can be discussed with your account manager and technical team on a case-by-case basis.

Please be aware that if your audit can't be completed in the required timeframe, it could impact your certification.

Alternate Audit Approach – Boundary Extension (Not Applicable for All Standards)

10. What happens if my organization is not eligible for remote auditing for our surveillance audit?

We may be able to extend your audit boundary date to a time when the situation allows for on-site audits to occur. This audit is to be completed by November 1, 2020, but auditor availability will be limited, and we would like to help you schedule your audit as soon as it is feasible.

Please be aware that if your audit cannot be completed in the required timeframe, it could impact your certification status.

Alternate Audit Approach – Remote Audits

11. Is NSF-ISR offering remote audits for all situations, standards and certifications?

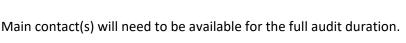
Not all situations will be eligible for remote audit options. Each organization/situation is evaluated to ensure that the accreditation of the certificate is protected.

12. How do I get approved for a remote audit with NSF-ISR?

For current certified organizations, your account manager will reach out to your organization with an informational form for your team to complete. Your responses will be returned to the account manager and then evaluated through our technical team. Your provided information will be reviewed in conjunction with your certification history, in order to best define the most appropriate path forward for your organization. The approved plan will be shared with you by your account manager, who will facilitate the next steps.

Please note that alternative actions taken are in accordance with contingency policies for emergency circumstances only and are not representative of normal certification cycle options.

13. What does my organization need to do to set up a successful remote audit? Although this is a remote audit we hope to stick to a process similar to an on-site audit.



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Key personnel will need to be available for their relevant parts of the audit. Key personnel can dial in separately or from the same location as the main contact.

You will need to either install MOVEit to allow for document sharing between your organization and the auditor, or provide access for our auditor to use your organization's document transfer system.

14. Can the remote audit process be completed by email if video is not available?

No. If your organization does not have the telecommunications necessary to support a remote audit, we cannot perform a remote audit. *To protect your organization's information while ensuring our operational reliability and compliance with SLA, internal governance and regulatory requirements, no remote email audits will be conducted.*

15. How are ITAR controls being managed for production activities?

It is your organization's responsibility to disclose this information and stay within your own regulations. Review our pre-audit planning document for more reminders.

16. What does my organization need to be aware of if we are eligible for a fully remote surveillance or recertification audit?

If your organization is approved for a remote surveillance or recertification audit, here are some key items to be aware of:

- Before your audit, your auditor will provide an audit plan with more remote audit details.
- Please provide the auditor with the needed platform and login information, so that needed software can be installed prior to the start of the audit.
- Please ensure the necessary participants are available to be present for the audit. Awareness sessions are suggested for your employees prior to the audit, when possible.
- The audit will take place on your organization's web conferencing application(s)/platform(s):
 - Teleconferencing with audio (and video where possible)
 - Web meeting
 - o Interactive web-based meeting app (e.g. WebEx, Skype, GoToMeeting or other application)
- All document sharing will be done through the MOVEit platform or client provided document transfer system. *Please be aware documents will not be accepted through email.*
- Your auditor may request to be shown areas or items in your facility to meet the requirements of certain standards, so please ensure you can be mobile during the audit.
- If the audit cannot be done remotely as scheduled, or if there are issues arise that prevent an effective audit, the situation will have to be reevaluated.

17. What if we cannot show all activities of a process through remote auditing?

The expectation is for all processes (as defined by your organizational context) to be audited, and all clauses to be audited, although the extent of auditing these activities may be affected by technology limitations, access restrictions or personnel constraints. Providing that all processes can still be assessed, some activities may be omitted from the 2020 audit and moved to the next on-site audit event (recertification or surveillance).





Certified organizations and auditors are encouraged to be creative in looking for ways to assess activities, given the unique situation we are in.

Alternate Audit Approach – Certificate Extension (Not Applicable for All Standards)

18. What does my organization need to be aware of if we were granted a six-month extension due to the current circumstances with COVID-19?

NSF-ISR will need to conduct a special audit remotely, prior to your certificate's expiration date, to ensure that the management system is in good standing. A temporary certificate is issued and then a recertification audit is scheduled within the extension period. If your organization is approved for a remote special audit, your account manager will provide details of its duration.

Key items to be aware of:

- If an extension is granted, the maximum time will be for six -months from your original expiration date and you must have the recertification audit event within the six-month extension.
- Once the remainder of the recertification audit is conducted on-site and a positive certification decision has been made, the new expiration date will revert back, remaining consistent with the previous three-year cycle.
- The time devoted to performing your special audit may be credited to the recertification audit to be performed as soon as possible when public health authorities lift shelter in place orders, with a minimum of one day on-site.
- If your audit can't be completed in the required timeframe, it could impact your certification, so please schedule your full recertification audit as soon as it is feasible.

Sharing Documented Information With the Auditor

19. Should I email documents to my auditor?

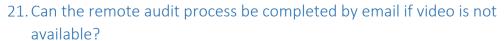
No. Clients and auditors are required to use MOVEit or a client-provided document transfer system, unless an on-site audit is being completed where there is no virtual documentation exchange required.

MOVEit allows our auditors and clients to transfer sensitive information securely, allowing us to ensure operational reliability and compliance with SLA, internal governance and regulatory requirements like PCI, HIPAA and GDPR. The MOVEit system:

- Secures enterprise data in transit and at rest with advanced security features and proven encryption (FIPS 140-2 validated AES-256 cryptography)
- Enforces user, system and file security policies while controlling the movement of sensitive files
- Leverages user authentication, delivery confirmation, non-repudiation and hardened platform configurations

20. Are auditors allowed to use customer-provided document transfer systems?

Yes, auditors can use customer provided document transfer systems. Under these circumstances the client is assuming the risk associated with sharing documents through their document transfer system.



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No. If your organization does not have the telecommunications necessary to support a remote audit, we cannot do a remote audit. To protect your organization's information while ensuring our operational reliability and compliance with SLA, internal governance and regulatory requirements, no remote email audits will be conducted.

AEROSPACE (AS91XX)

22. Are full remote audits available for AS91XX certifications?

Yes, the International Aerospace Quality Group has offered relief to some requirements, as described in the FAQs. It does not authorize or approve the use of certificate extensions.

23. Will my auditor need to cover all shifts during a remote aerospace audit?

Yes, all shifts are required to be assessed at recertification audits. At a surveillance audit, the auditor will need to assess all shifts for the processes included on the audit plan.

AUTOMOTIVE (IATF 16949)

24. Is there any indication from the IAOB to allow remote auditing for IATF?

Yes, as of October 30, 2020 IATF is allowing remote audits for organizations with valid COVID-19 pandemic reasons. If there are no reasons directly related to the COVID-19 pandemic that prevent an on-site audit within the allowable timing and intervals as per the IATF Rules, 5th Edition section 5.1.1, NSF-ISR will conduct the audit at the manufacturing site and remote support location(s) (as applicable). However, IATF prefers audits to be conducted on-site.

25. How does my organization qualify for an IATF 16949 remote audit?

On-site audits remain the preference of IATF. Remote auditing for IATF 16949 is allowed only for organizations with valid COVID-19 pandemic reasons. In cases where an IATF 16949 audit cannot be conducted on-site within the allowable timing and intervals, IATF is permitting NSF-ISR to conduct the audit using remote auditing methods and technology under the following condition:

It is evident that a regular on-site audit will not be possible for reasons that are directly linked to the COVID-19 pandemic. Organization must to demonstrate the COVID-19 pandemic reasons clearly.

When applicable, remote audits can apply to all facilities (manufacturing sites, including extended manufacturing sites, or remote support locations) and all types of audits (stage 1, stage 2, recertification, surveillance, transfer and special). Please note, this update implies audit days can be extended to allow for breaks to avoid screen fatigue and follow audit trails beyond the initial audit plan.

26. Are there additional costs to consider with IATF 16949 remote auditing?

Certification bodies, like NSF-ISR, are required to calculate 10% of the total audit days, but no more than a maximum of eight hours, to allow auditors and IATF 16949 certified clients to complete the additional audit planning steps required for a remote audit.

27. Will an IATF 16949 remote audit take the same amount of time as an onsite audit?

Remote audits could potentially take more time than an on-site audit. The IATF revision 5 update implies audit days can be extended to allow for breaks to avoid screen fatigue and follow audit trails beyond the initial audit plan.

Also, up to eight hours can be added for extra pre-audit planning and set-up. Otherwise, remote audits will be equivalent in duration to on-site audits, but IATF is encouraging that time be added to a remote audit due to the added complexity of this approach. Special conditions apply if your organization is not operating or is not manufacturing automotive products when the audit is due.

28. Are there changes to IATF 16949 monitoring events?

Yes. No IATF monitoring events are to be completed after December 31, 2020. As of this date, all audits must be conducted on-site or remotely per normal timing rules.

29. Are all recertification audits extended because all certificate expiration dates were extended?

No. IATF clarifies that not all recertification audits are extended even though all certificate expiration dates were extended. Only recertification audits that cannot be conducted within the required interval due to COVID-19 pandemic-related restrictions can be extended further. Audits that will become due from January 1, 2021 forward can no longer apply the conditions and waivers described in the previous revisions of IATF Global Waivers and Measures in Response to the Coronavirus Pandemic (COVID-19). Starting January 1, 2021 all audits will be on-site or remote and extensions may not be applied.

30. What if our organization's audit was originally postponed?

If your audit was postponed, NSF-ISR will conduct either an on-site or a remote audit. The global extension to all currently issued and valid IATF 16949 certificates remains. The timing of the audit will not exceed the current extensions already permitted.

31. If my organization has pending nonconformities, which IATF Rules apply?

Nonconformities requiring a decision of acceptability after January 1, 2021 will follow the requirements in IATF Rules, 5th Edition.

32. What if our organization's site is shut down or not manufacturing?

In cases where a manufacturing site or a remote support location is completely shut down or is not producing automotive parts at the time an audit is required, the certification body, NSF-ISR, will gather the necessary information from the client to understand their current and expected future situation.

Based on the evidence gathered, NSF-ISR will determine the potential date for the audit and contact the appropriate IATF Oversight office with a waiver request.

33. Can you explain how an IATF 16949 suspension works?

The term "suspension" can sound rather ominous, but when it comes to the IATF process, it should not be viewed as a daunting or stressful situation for an affected organization.

IATF takes a different approach to suspended certificates. The Rules for Achieving and Maintaining IATF Recognition 5th edition, section 8.3 states, "during the suspension period, the certificate remains valid and is still recognized by the IATF."

Those exact words are further re-stated in The IATF Global Waivers and Measures in Response to the Coronavirus Pandemic (COVID-19) (Revision 5 pg. 29).

34. What does my organization do if our IATF 16949 certification is suspended?

In case your certification is suspended we strongly recommend that your organization communicates this to your OEM customers and explain this suspension is due to COVID-19-related issues rather than performance issues. This is important as within the IATF database all suspensions appear the same.

If your IATF 16949 certification is suspended, there are two options to come off suspension during this COVID-19 induced extension:

- 1) Your organization and NSF-ISR are both able to accommodate and complete an on-site or remote IATF 16949 audit
- 2) A remote monitoring event is scheduled and performed *Please note this can only be scheduled and performed within the last 30 days of a second 90-day extension and prior to December 31, 2020.*

Obviously, through either scenario, your organization would need to successfully pass the audit, or event, for the suspension to be lifted.

Please know the NSF-ISR team fully understands suspension concerns and will continue to work closely with your organization through this very trying time.

ANSWERS TO WEBINAR QUESTIONS

- 35. My audit was in March and was cancelled and our certificate expires in June. Are account managers proactively sending out forms or do I need to request one?
 - We are reaching out for future audits. If your audit was cancelled and you are interested in a remote audit, please contact your account manager.
- 36. If our audit is scheduled for early June, should I reach out to my account manager now for the form (#20994)?

Yes, if your organization is interested in a remote audit, please contact your account manager.

- 37. I learned through AIAG communication that IATF is providing relief for expiration due dates. For example, surveillance audit up to 90 days. What about ISO 9001:2015?
 - For ISO 9001 we can postpone surveillances up to the end of 2020, if a fully remote surveillance audit is not preferred in the short-term.
- 38. How does this effect the cost of the total audit?

The cost of the audit itself should not change; however, there will be no fees associated with the normal travel expenses that would be incurred for a regular on-site audit.







- 40. Could audit durations potentially be impacted because of the remote audits? If the audit progress is slower due to connection delays, will the remote audit be extended?

 We will make our best effort to adhere to the scheduled audit time.
- 41. If we schedule a remote audit, but the COVID-19 restraints have been lifted before our audit, can it go back to an on-site audit?

Yes, provided both NSF-ISR and your organization's policies and directives allow it.

Please note we are currently stopping all on-site audits through June 1. If your audit is scheduled after June 1, we can look at an on-site audit option. Please contact your account manager to determine the best path forward.

42. Can an organization opt to let its certification expire and reinstate it within 12 months? Would we need to justify and get approval, or can we just request it, based on what we see our current environment/needs to be?

Yes, organizations may take this approach.

Yes, we will need to perform a technical review to make sure all the timing can be arranged properly for the time when your organization chooses to be audited for recertification.

However, if it is not COVID-19 related, this exception will not apply.

Currently rules allow for 12 months but this is subject to change as this situation evolves, meaning this rule could change or be adjusted by IAF or other industry bodies, potentially resulting in a shortened timeframe depending on the situation.

Please note there is some risk associated with this decision, but currently this is an acceptable option.

43. Will a remote recertification audit need to be an audio or video conference?

A remote recertification audit will still need to have both an audio and video conference component. Please review the minimum requirements for a remote audit in question #6: We prefer a remote audit to be conducted now. What do I need to make that happen?

44. The form for a remote audit has been completed. How long must we wait for a response from NSF-ISR?

Once the form is completed and returned, it goes through a technical review process. We are trying our best to reply within three business days.

45. Is there a chance my early July assessment audit will get "bumped" to accommodate other folks?

We will do our best to accommodate all scheduled audits, whether conducting them remotely or on-site (if the situation and NSF-ISR policy permits).



- 46. My organization is a municipality and our operations are shut down/severely limited. Will NSF-ISR allow some time for our operations to return to normalcy before an audit can take place?
 - Yes, to the greatest extent allowed by the rules governing the standard(s). We will work with client organizations to get back on track with their certifications as we emerge from the pandemic.
- 47. Should I contact my account manager or wait for them to contact me?

 If your audit is in the next two to four weeks and you have not heard from your account manager, please contact them.
- 48. If our reassessment is scheduled to occur in November, will our account manager still reach out a few weeks in advance to discuss next steps? In the case that the May 31 date is extended and delayed reassessment/surveillance audits from earlier in the year ripple into the fall, what is the process?
 - We are currently working on audits in the April to June timeframe. We will continue to monitor the pandemic and evaluate how long remote audits are an option.
- 49. GWO just released the GWO BSTR-P standard. Is NSF International ready to audit and extend certificates to the new standard?
 - NSF International can begin to offer remote-based auditing solutions for the BSTR-P, and will be following the guidelines as noted in the <u>Requirements for GWO Training Providers and Certification</u> <u>Bodies</u>. Please let us know when you are prepared to move forward and we can plan accordingly.
- 50. How does NSF-ISR assess whether or what parts of a scheduled surveillance audit (SFI & FSC) FM/COC certificate can be done remotely?
 - We use a risk-based approach, looking at a variety of items, including non-conformances over the certification cycle as well as the previous year, ability to close out CARs (CAR-specific), customer complaints and if the client is part of a complex, and an integrated or multi-site organization.
 - An evaluation is then made by the technical team as to whether a partial remote with a special audit or full remote audit can be completed and result in an effective audit.
 - The certification scheme guidance is also factored into the decision to determine if there are parts of the standard(s) that can be effectively audited remotely.
- 51. How will NSF International approach impact to an organization's ability to do internal monitoring?
 - Internal monitoring is a portion of the ATFS standard that is required to be reviewed each year.
 - If a client is unable to complete their internal monitoring due to COVID-19 restrictions, then delaying the audit until such monitoring can be completed is taken into consideration.

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52. Is it possible for NSF to loan web cams or other equipment to perform an audit, or do we have to purchase these?

We are not providing any equipment to clients to complete remote audits. Please review question #16: What does my organization need to be aware of if we are eligible for a fully remote surveillance or recertification audit?

53. Are remote audits followed up with in-person audits for those portions that can't be completed remotely?

The current ruling allows us to conduct the remote audit and if there are activities that cannot be confirmed, verified or fully evaluated, the activity is going to be moved into and verified in the next audit (in 2021) whether it's a recertification audit or a surveillance audit.

There are some notations that would be made by the auditor to ensure we do our follow-up on these portions of the remote audit during the next audit event. This could mean additional time required during the next audit event.

However, if we are conducting a special audit to extend the certification validity, there absolutely would be an on-site recertification audit later in the calendar year, hopefully before the expiry just so that we can ensure the validity of the certificate and issue the new certification.

54. We have already received the form for a surveillance audit scheduled in mid-June. What is the deadline to complete and return the form?

The sooner you return the form to NSF-ISR, the sooner we can provide the technical review and potentially schedule your audit. Right now, any audits scheduled before August 1 can be done remotely. We are hoping to complete any audits scheduled after August 1 on-site, and will evaluate this closer to August.

55. Is attendance for opening and closing meetings required for people beyond the management representative during the remote audit?

The remote audit process is no different from an on-site audit where an auditor would sit in a conference room, conducting the interviews in person. Everyone on the audit will still need to be brought together to share the audit findings at the end of the audit. These conversations will now be held in a virtual environment.

If you have a conference room and can maintain appropriate social distancing inside of that conference room, that's great. If we need to invite other people into a virtual meeting room, they can participate from their home office. We just need to all be together.

56. Will opening and closing meetings with our companies' staff still happen during remote audits?

The auditor will conduct a formal opening and closing meeting and will capture all the staff that attended the meeting remotely. It is up to the company who they invite to the meeting. It should be the typical personnel that attended these meetings in the past, if available.

57. Will the remote audit still be performed by our same assigned auditor?

It depends. We will try to keep the same auditor if possible as this will help maintain continuity of your system as the auditor understands your people and your operations and knows your building layout. This will help us provide more productive audits for you remotely.

One of the benefits of a remote audit is we can provide any auditor as your organization will not be paying for related travel or other expenses. For example, if we are sending a California-based auditor to the East Coast for a remote audit, the East Coast organization will not be paying for the travel expenses as this is a remote audit. Once business is able to return to normal, we will work to return to a more local auditor for on-site activities, but for remote audits it is more important for us to meet your timeline.

ADDITIONAL RESOURCES

- Management Systems Resources for COVID-19
- NSF-ISR Remote Audit Process webinar
- Quality for a Remote Audit (PDF)
- Pre-Audit Planning Reminders (PDF)