



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

**July 6, 2021**

**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 update existing ICOP scheme alleviations associated with the COVID-19 pandemic and the 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 January 12, 2021.

## **2.0 Applicability**

This document applies to all participants in the IAQG ICOP scheme. Requirements in this document supersede all previous notices and may be applied to audits where the audit duration is between September 1, 2021 and December 31, 2021. This notice, and all earlier notices, are not valid after December 31, 2021.

## **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 must not be applied 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 and maintain 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.
- 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.
- 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:
  - An initial AQMS certification
  - An extension to technical or geographic scope of AQMS certificationThe documented notification shall include the client name, client reference, number of sites, language of the audit, and the planned date of audit.
- 3.7 CBs shall ensure that audit activities that have been deferred from previous audits are reviewed and, where possible, audited.
- 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.
  - Certificates that are identified as expiring within the next three months 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, the December 31, 2021 provided the certificate number has been appended with the unique number [IAF-ID3]. Certificates may be reinstated utilizing an initial certification audit in OASIS, without completing 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 or for the extension or reduction 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 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 (reference IAF MD 4:2018 and 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.
- 5.7 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 (reference IAF MD 4:2018 and IAF ID 12:2015) to support the assessment of CB's.
- 6.2 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 Other Party (OP) Assessor travel may be authorized for on-site assessments as an exception. The requesting OP Assessor, SMS or CBMC Oversight Chair must provide a justified need to the IAQG OPMT Leader or Oversight Chair for domestic travel or the IAQG Executive Committee for International Travel and must obtain their authorization before travel is started. Where IAQG support for travel is requested, the travel process for the applicable sector must be used in addition to the IAQG travel authorization.
- 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.



Eric Jefferies  
IAQG OPMT Chair

**Change Summary:**

<b>Date:</b>	<b>Change:</b>
2021-01-12	Section 3.8 – “The date of the first surveillance audit shall occur within 18 months of the initial certification decision date” was re-introduced into the notice as it was omitted from the previous version. Section 5.3 - Reference to IAF MD4:2018 added. Appendix 1 – RAFA Model updated to 2021-01 Version and Excel 2016 compatible version added
2021-07-06	All sections updated. Changes include: <ul style="list-style-type: none"><li>- Limiting the applicability of this notice to December 31, 2021.</li><li>- Removal of the 90-day extensions for the processing of nonconformities including the corrective action submittal date.</li><li>- Removing the allowance for the first surveillance date to be within 18 months of initial certification.</li><li>- Amendments to the process for authorization of OP Assessor travel.</li></ul>



## **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:



2021-01 Remote Audit  
Feasibility Assessment

Version compatible with Excel 2016:



2021-01 Remote Audit  
Feasibility Assessment

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