NSF-ISR COVID-19 Related Audits
April 2020
PERFORMANCE, NOT JUST CONFORMANCE
Agenda

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Introductions

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Moderator
Let's take a poll...
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NSF-ISR Position
COVID-19

> Primary concern is the health and safety of our team and clients

> Mission of public health and safety organization

> Conducting business during COVID-19

> In North America, all on-site visits are prohibited through May 31
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Industry Relief
Industry Relief

> Offering relief:
  • ISO 9001
  • ISO 14001
  • ISO 45001
  • ISO 13485
  • ISO/IEC 20000-1
  • ISO 27001
  • AS91XX
  • RIOS
  • E-Stewards
  • Ontario Drinking Water (DWQMS)
  • IATF 16949 – extended dates only, no remote

> No relief (possibly, yet):
  • Food Schemes (ISO 22000/FSSC 22000)
  • RCMS
  • R2
Industry Position on Process

> No universal approach defined for COVID-19, but CBs required to follow guidance of IAF Informational Document 3 (2011)
  - IAF Informative Document For Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations

> Some industries have offered more prescriptive requirements
  - IAQG OPMT Resolution 157 and response statements
  - IATF Global Waivers and Measured in Response to the Coronavirus Pandemic (27 Mar 2020)
General Limitations – Remote Auditing

> Remote auditing allowed, with approval through CB process (IAW IAF MD4 and IAF ID12)
  • Surveillance
  • Recertification

> Limited remote auditing (approvals required)
  • Transfers

> Not allowed
  • Stage 1/Stage 2 (initial registrations)
  • Specials audits – scope changes
  • Organization not able to facilitate
  • IATF 16949
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Path Forward
NSF-ISR Prioritization

Many certified organizations impacted, so work by priority

- Upcoming audits (next 1-4 weeks)
- Recertification audits (working by expiry)
- Surveillance activity due in 2020

Maintain infrastructure to ensure minimal impact to certificates

Managing resource risks (ensure no “bubble” in 2H 2020 from pushed outs)

Forward-looking risk monitoring to prevent unforeseen issues, where possible
NSF-ISR Process Overview – Organization Review

1. Account manager notifies certified organization and sends information form

2. Organization completes the information form and returns
   • Preference on approach
   • Readiness for remote auditing
   • Other risk factors to consider

3. NSF-ISR conducts technical review/disposition
   • Each client reviewed for preferences and circumstances
   • Dispositioned for most appropriate approach for client

4. Account manager coordinates to discuss next steps (scheduling/clarification)
NSF-ISR Process Overview – Considerations

> Audit type (recertification vs. surveillance) and expiration date

> Activity level (e.g. operational, restricted processes, remote workers, shuttered)

> Visitor/access restrictions

> Infrastructure to facilitate remote audits
  - Network bandwidth for video conference
  - Virtual meeting platform
  - File sharing abilities

> Additional risk factors, as defined by IAF ID3
Remote Audit/Conference Platforms

> Must be provided/prescribed by customer
  • Based on your regulatory landscape/requirements (e.g. NIST 800-171, export control, ITAR, EAR, GDPR, etc.)

> Needs to support document sharing, video, audio
  • May need multiple platforms (e.g. recorded video, wearable technology, FaceTime video, WhatsApp video, Bluejeans collaboration, etc.)
Possible Approaches

> 100% (up to) remote audit with proper infrastructure

> Move audit to later in CY 2020*

> Cert expiration and restore / reinstate within 12 months
  • Shows as expired until audit is completed (and NCR addressed)
  • 3 year expiry, from original cycle

> When permitted, extension of certificate expiration*
  • Not allowed for all standards (e.g. aerospace)
  • Includes remote audit now, with 6-month extension and recertification audit in 6-month period

*Note: If the situation extends to later in the year, there could be risk to certification.
Audit Planning – Remote Audits

> Auditor builds audit plan – sends at least 2 weeks before audit
  • Ensure understanding of activities being reviewed and times – have stakeholders lined up (reduces down time in audit)
  • Consider sending auditor a list of personnel in each process, so plan can be more specific

> Send meeting invites so software can be installed (internal and auditors)
  • Consider test run a few days before audit

> Test system and ensure connectivity (don’t wait until day of the audit to learn how to use the system)
  • Microphone/headset may be needed in noisy environment
  • Team auditors require separate virtual meeting rooms/hosts
  • Ensure connectivity in facility areas where activity occurs (e.g. no WiFi issues)
Remote Audit Limitations

Regulated information
- Don’t violate laws on showing export controlled information
- Try to work around, when possible

Processes are reviewed, but activities may be limited – it’s OK
- Tough to review some activities remotely or personnel not working
- Will review in at next on-site audit event

We still want to audit processes and personnel, not just forms/outputs
- Off-shifts encouraged, but only required for aerospace audits
Additional Thoughts

> Requires trust – Embrace for “value” audits can offer
  • Will not be as effective, but doesn’t have to be ineffective

> Make as effective as possible...be creative on how to share activity

> Auditors will confirm the scope, through sampled evidence
  • Burden of proof is unchanged, they need objective evidence for all aspects of scope of registration
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Information Transfer
NSF-ISR is following ISO 27001 framework

> Avoid emailing sensitive documents to auditor
  • May use your platform, but all auditors have access to encrypted file transfer program for use (more info coming)

> Prefer communication to be sent/received with their @nsf.org email address
  • Controls in place for our server (not on their personal email)
MOVEit

> Improves file transfer security, using encryption

> All files to/from customer need to be exchanged through this platform or your platform (not email)

> [https://moveit.nsf.org](https://moveit.nsf.org)
  - Auditor sends invite to virtual space for exchange

> Will send client instruction out with link to recording
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Stay Connected
Updates Are Expected

> Dynamic situation, with many unknowns and driving forces

> New process and updates coming as we get more experience

> Updated communicated through:
  - NSF website ([www.nsf-isr.org](http://www.nsf-isr.org))
  - NSF Connect
  - Email updates (Pardot)
  - LinkedIn ([#nsfisr](https://www.linkedin.com/))
Use the QR code below to view our news item and online resources.
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Closing Thoughts/Questions