



Heads Up

Issue: 06

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To: ANSI-RAB NAP Accredited Registrars and Accreditation Auditors

From: Randy Dougherty, Director of Registrar Accreditation

Re: Audit Time for AS9000 and AS9100

The Americas Aerospace Quality Group's Registrar Management Committee, which includes registrar representatives from IAAR, and which also includes the three recognized accreditation bodies (ANSI-RAB NAP, SCC and INMETRO), confirmed that the starting point for determining audit time is the **total number of employees for all shifts** for a facility.

In practice, this means that if the audit time for a quote or audit plans varies from the audit times in IAF Guidance on the Application of ISO/IEC Guide 62: 1996, Issue 2, then it will be expected that there will be written justification for the variance.

This was recently raised as an issue with the ANSI-RAB NAP. While the ANSI-RAB NAP has always applied the IAF guidance this way for all ISO 9000-based QMS audits and for all of the sectors (QS-9000, AS9100, and TL9000), we became aware that this is not consistent among all CRBs and accreditation bodies. So this has been put on the agenda for the IAF Technical Committee meeting to be held in Australia in February. A copy of the ANSI-RAB NAP discussion paper is attached.

For the record, the ANSI-RAB NAP will continue to apply the IAF Guidance this way for all QMS quotes and audits, including all of the sectors, unless there is a change that comes out of the discussion at IAF.

Discussion Paper on Audit Time
By Randy A. Dougherty
For the IAF Technical Committee
February 2003

What is the Issue? Is the starting point for determining the number of audit days for a specific facility of an organization the total number of employees for all shifts or the number of employees on a single shift “which will best demonstrate the full scope of the QMS”?

The original committee members draft of the wording in Annex 2 of the most recent issue of IAF Guidance on the Application of ISO/IEC Guide 62: 1996 has two opinions:

1. That the total number of employees is used as the starting point, with audit time added or reduced from this starting point based on the considerations in Notes 1 and 2.
2. That the “...effective number of employees...who will be present at the time of the audit...” is used as the starting point, with time added or reduced from this starting point based on the considerations in Notes 1 and 2. This will depend on a CRB and the client agreeing upon “timing of the audit which will best demonstrate the full scope of the organization.”

There are differences between ABs, and therefore between CRBs, about this issue.

Why is it an issue? Two reasons:

This issue of audit time originated with the ANSI-RAB NAP in response to an OEM oversight audit of a CRB in the United States. The OEM cited the CRB with a nonconformance because the CRB based its audit time on a single shift. The ANSI-RAB NAP supported the decision of the OEM. The Americas Aerospace Quality Group’s Registrar Management Committee, which includes CRB representatives and ABs SCC and Inmetro, support the position of the ANSI-RAB NAP, which is that the starting point for determination of audit time is the total number of employees for all shifts.

Note: In response to the CRB, the ANSI-RAB NAP polled a few other ABs and became aware of the differences between ABs and CRBs about this issue, which is why this issue is being discussed with the IAF Technical Committee.

1. It creates an unintended ambiguity that exacerbates the variation between the quoted audit time of different CRBs competing for the same client.
 - a. Consider the real world of quoting for new clients. Not many CRBs have a process to get at the time of an initial quote – all of the detailed information that allows appropriate analysis for making adjustments. Most only get the “total number of employees” or “number of employees per shift.” I do not know of any that get enough additional information about each shift and other kinds of information explained in the guidance in order to decide it can use a single shift “which will best demonstrate the full scope of the organization.”
 - b. This is a significant issue among CRBs that want consistent and uniform enforcement by all ABs so that competitive advantage is not achieved by unexplainable variations in audit time.
 - c. Many CRBs already feel that competitive pressures require quoting audit time that is marginally enough at best.
 - d. The ANSI-RAB NAP is frequently contacted by prospective registration clients asking about the unexplainable variations in audit time quoted by different CRBs. This issue causes stakeholders to question the credibility of third-party registration.
 - e. Consider also repeated comments that doing an effective audit to ISO 9001:2000 may require more time.
2. Management of shifts is an issue, so there is a question about whether it would be appropriate to make it a normal and expected practice to base audit time on a single shift.

- a. One reason the automotive industry for QS-9000 and ISO/TS16949 requires auditing of all shifts is because of general acknowledgement that off-shifts frequently lack the consistent rigor of conformance with an organization's own system and processes. This is an issue that should at least be considered by any CRB. So this indirectly draws all shifts into consideration of audit time.

An argument supporting a position that the starting point for determination of audit time is the total number of employees for all shifts.

A reasonable case can be made that the starting point is the total number of employees, based on Annex 2 of the IAF Guidance on the Application of ISO/IEC Guide 62: 1996.

The third paragraph clearly states the intent of the guidance "...a consistent approach to the determination of appropriate auditor time."

The fourth paragraph makes the point "...the number of employees serves as an appropriate starting point to establish auditor time required." Note that there are no qualifiers to this wording. It is the "number of employees."

The fifth paragraph clearly explains the myriad of factors that must be taken into consideration in calculating auditor time. In my opinion, these factors may be justifications for auditor time reductions or additions – but the single starting point for consideration should be the "number of employees" as stated in the preceding paragraph.

This thought is reinforced by the sixth paragraph, "The Auditor Time Chart below provides the framework for a process that could be used for Audit planning by identifying a starting point based on the number of Employees, then adjusting for the significant factors applying to the organization to be audited, and attributing to each factor an additive or subtractive weighting to modify the base figure." I highlight in this paragraph "...identify a starting point based in the number of Employees..."

Consideration of shift would be a factor for adjustment from the starting point based on number of employees, as stated in Note 1. Consideration of non-permanent staff would be a factor for adjustment from the starting point based on the number of employees.

A recommendation for consideration by the IAF Technical Committee.

- a. Revise the fourth and sixth paragraphs to replace "number of employees" with "total number of employees for all shifts."
- b. Revise Note 1 to add as the second sentence, "The total number of employees for all shifts is the starting point for determination of audit time."