

# FINDING

**CB:** Aviation Suppliers Association dba  
ASACB

**Audit # - Finding #:** ASA-ISO9001-WA-2011-2740, NCR 01

**NCR Type:** Minor

**NCR Status:** Plan Approved

**Is this a Follow-Up to a Previous Finding?**

**If so, what is the Previous Audit # - Finding #:**

**Requirement Document:** ISO/IEC 17021

**Add Requirements Apply:**

**Requirement Section:** 9.3.3

**Requirement:**

The certification body shall maintain certification based on demonstration that the client continues to satisfy the requirements of the management system standard.

**Statement of Finding:**

Objective evidence did not support that the CB's audit process was completely effective in determining whether the requirements of ISO9001:2008 continue to be met.

**Audit Evidence:**

\*ISO9001:2008 Clauses 4.1f and 8.5.1: Quality objectives do not support determining whether the organization is continually improving the effectiveness of the quality management system since no measurements are attached to them. The client's stated quality objectives are "Higher Customer Satisfaction and Reduced Number or No Customer Rejects."

\*ISO9001:2008 Clause 7.5.1c: Order pullers were interviewed regarding how they conduct business and were asked whether they have work instructions, but no verification of such instructions or adherence to them was conducted.

**Plan Due Date:** 9/12/2011

**Evidence Implementation Due Date:**

11/12/2011

**Comments on Finding:**

**Withdrawn Justification:**

**Withdrawn Date:**

**Type Revision Justification:**

**Type Revision Date:**

**ANAB Accreditation Auditor's Sig** \_\_\_\_\_

**Date:** \_\_\_\_\_

**CB Representative's Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Corrective Action Information:**

**Corrections**

<b>Response Date</b>	<b>CB Responses</b>	<b>Evidence</b>	<b>Review Date</b>	<b>ANAB's Responses</b>	<b>Reviewer</b>	<b>Approve</b>
9/10/2011	See zip file	NCR-1.zip	09/15/2011	Not identified.	Bryan Blunt	Needs More Information
9/19/2011	For Condition (A): None required for this NCR.  For Condition (B): None required for this NCR.		09/19/2011	Not identified.	Bryan Blunt	Needs More Information
9/24/2011	For Conditions A & B, the audit was completed, there is no containment required either condition, and as such no specific correction is required.		09/27/2011	Evidence was not provided substantiating that the extent of the nonconformity has been determined and that the nonconformity has been contained. Accordingly, additional information is needed. The due date for submitting that information is October 7, 2011.	Bryan Blunt	Needs More Information
10/7/2011	For both Conditions A and B: ASACB has attached a declarative statement as evidence substantiating that the extent and containment of the nonconformity. See attached.	Evidence sent to EQM for NCR-1 10-7-11.pdf	10/11/2011	The declarative statement identified that the extent of the nonconformity is contained within the ASACB existing auditor base and the single client associated with this audit.	Bryan Blunt	Fully Approved

**Root Cause**

<b>Response Date</b>	<b>CB Responses</b>	<b>Evidence</b>	<b>Review Date</b>	<b>ANAB's Responses</b>	<b>Reviewer</b>	<b>Approve</b>
9/10/2011	See zip file	NCR-1.zip	09/15/2011	Root cause analysis was completed for condition (A) (ref. associated response attachment), but was not completed for condition (B). Referencing condition (B), the requirement stated in the NCR (ISO9001:2008 Clause 7.5.1) specifies that production and service provisions are to be carried out under controlled conditions. Evidence was in fact provided during the audit to indicate that order pullers could locate their work instructions. No verification was conducted during the audit, however, to substantiate that those same personnel actually carried out their processes in accordance with those instructions.	Bryan Blunt	Needs More Information

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9/19/2011

For Condition (A):  
Root Cause(s) and  
contributing factors:

As part of the  
investigation the  
following documents  
were reviewed:

- IEC/ISO 17021,  
Par 9.3.3
- ISO 9001:2008,  
Pars 5.4.1; 7.5.1;  
8.5.1

Investigation:

Out-briefing  
discussions with the  
ASACB auditor  
confirmed the  
statement-of-fact that  
the client's Quality  
Objective measures  
address changes in  
continual  
improvement relative  
to past measures but  
do not include  
specific target  
performance metrics.

Why did the auditor  
not identify specific  
target performance  
metrics?

The auditor  
understood that the  
client's relative  
performance  
measures (rather  
than specific target  
performance metrics)  
with respect to their  
Quality Objectives  
met the requirement  
of ISO 9001:2008,  
Par 5.4.1.

However, it was  
evident at the time of  
the audit that  
'relative' performance  
measures alone do  
not accurately display  
effectiveness of the  
QMS.

Why are relative  
performance  
measures alone not  
sufficient to comply  
with ISO 9001:2008,  
Par 5.4.1?

09/19/2011

Root cause analysis  
was completed for  
condition (A) (ref.  
associated  
response  
attachment), but  
was not completed  
for condition (B).  
Referencing  
condition (B), the  
requirement stated  
in the NCR  
(ISO9001:2008  
Clause 7.5.1)  
specifies that  
production and  
service provisions  
are to be carried out  
under controlled  
conditions.  
Evidence was in  
fact provided during  
the audit to indicate  
that order pullers  
could locate their  
work instructions.  
No verification was  
conducted during  
the audit, however,  
to substantiate that  
those same  
personnel actually  
carried out their  
processes in  
accordance with  
those instructions.

Bryan Blunt

Needs  
More  
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The long-term impact of using relative-measures alone to accurately quantify effectiveness of the QMS was not clearly understood.

For example, if customer rejects increase (rather than decrease) by 30% during the first measurement interval, then decreases by 10% during the next interval, the client will falsely believe customer reject performance has improved when in fact performance has overall deteriorated by a net YTD 20%.

Root Cause:

The root cause of the NCR is attributed to a lack of understanding by both ASACB as well as the auditor.

For condition (B):

Root Cause

Investigation:

As part of the investigation the following documents were reviewed:

- IEC/ISO 17021, Par 9.3.3
- ISO 9001:2008, Par 7.5.1

Investigation:

IEC/ISO 17021, Par 9.3.3 was reviewed. It is unclear as to whether this is the appropriate reference.

Out-briefing discussions with the ASACB auditor as well as the client were conducted. Both the auditor and client disagree with this finding. The interviews were

conducted independently from one another.

The interview with the client indicated the employee was following company procedures for the task being conducted.

During the interview with the auditor, the auditor stated that when the employee was asked to display the company's work instructions associated with the task he was performing, the employee successfully pulled the procedures up on the company's computer screen. It was at this point in time the auditor was satisfied that the work instructions were readily available and accessible to the employee at point-of-use. The employee, however, was not asked to open the work instruction file itself that was displayed on the computer screen. Since the employee was following the process as described in the work instruction (having the work instruction previously reviewed by the auditor), the auditor was simply verifying the employee's knowledge as to where to go to access the work instructions, if needed.

Root Cause:  
It is unclear from this investigation as to whether the client failed to show or the auditor failed to make a finding of

compliance to ISO  
9001:2008, Par 7.5.1  
(b).

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9/24/2011

9/21/11 2nd  
Response to ANAB  
for Condition B:  
Further inquiry  
revealed that during  
the audit the ANAB  
Assessor did not  
witness the auditor  
reviewing the client's  
work instructions or  
taking notes  
pertaining to the work  
instructions prior to  
assessing the client.  
As such, the ability  
for any auditor to  
effectively assess a  
client's compliance  
with their work  
instructions was not  
demonstrated.  
Relying on memory  
alone is not sufficient.

09/27/2011

The root cause  
analysis addresses  
the direct cause of  
the nonconformity,  
however it does not  
then address  
subsequent  
underlying cause(s).  
Accordingly,  
additional  
information is  
needed. The due  
date for submitting  
that information is  
October 7, 2011.

Bryan Blunt

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10/7/2011

3rd Response to ANAB for Condition B:  
Following is the RCA for Condition B:

10/11/2011

The root cause analysis identified direct and underlying causes associated with this nonconformity.

Bryan Blunt

Fully Approved

Why was the auditor satisfied that the work instructions were readily available and accessible to the employee at point-of-use without having the employee open the work instruction file itself once displayed on the computer screen?

The employee needed only to 'click' on the PDF file to have completed the task of demonstrating to the auditor the work instructions were available at point-of-use. The auditor should have required the employee to complete the necessary steps to demonstrate the work instructions were available to him a point-of-use.

Additionally, the auditor could have verified the steps being undertaken by the employee matched the steps in the work instruction. It was the auditor's responsibility for making a finding of compliance or non-compliance based on the completion of those steps.

Root Cause:

The auditor relied on his memory alone rather than using the work instruction during his assessment.

Contributing factors:

1. Lack of attention to detail.
2. Pressure to remain on schedule.
3. Stress as a result of conducting the audit while being observed by two ANAB personnel.

Why was the auditor confident that having previously reviewed the work instruction (without having the WI in hand) was sufficient to assess the employee's ability to follow those work instruction?

The auditor stated he was confident in remembering the steps in the work instruction without needing a copy during the witnessing of the process.

Contributing factors:

1. Overconfidence in relying on the auditor's own memory as a mental check-list. Work instructions are by their very nature more detailed than procedures or policies. In many instances the sequence of the steps are as important as the steps, themselves. As such, there is a risk that the demonstration by the employee to follow those work instructions cannot be determined if the work instructions are not available to the auditor during the witnessing of the process.
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**Corrective Actions**

<b>Response Date</b>	<b>CB Responses</b>	<b>Evidence</b>	<b>Review Date</b>	<b>ANAB's Responses</b>	<b>Reviewer</b>	<b>Approve</b>
9/10/2011	see zip file	NCR-1.zip	09/15/2011	While the root cause analysis for condition (A) identified a lack of understanding within ASACB overall, the stated corrective action did not address that root cause. Rather, it only covered one-on-one training with a single auditor. In addition, the parties responsible for the action were not identified. The stated corrective action for condition (B) did not address the root cause since no root cause analysis was performed.	Bryan Blunt	Needs More Information
9/19/2011	<p>For Condition (A): Training in the form of a one-on-one mentoring was conducted and documented on September 5, 2011 addressing Quality Objective metrics as related to 9001:2008, Par 5.4.1.</p> <p>For Condition (B): In spite of the lack of consensus regarding compliance or noncompliance, training in the form of a one-on-one discussion was conducted with the auditor and documented on September 5, 2011 addressing the requirements of ISO 9001:2008, Par 7.5.1.</p>		09/19/2011	While the root cause analysis for condition (A) identified a lack of understanding within ASACB overall, the stated corrective action did not address that root cause. Rather, it only covered one-on-one training with a single auditor. In addition, the parties responsible for the action were not identified. The stated corrective action for condition (B) did not address the root cause since no root cause analysis was performed.	Bryan Blunt	Needs More Information

9/24/2011

9/21/11 2nd  
Response to ANAB  
for Condition A:  
Additional training for  
all ASACB personnel  
and all ASACB  
auditors will be  
conducted and  
documented by  
October 21, 2011  
addressing Quality  
Objective metrics as  
related to 9001:2008,  
Par 5.4.1.

9/21/11 2nd  
Response to ANAB  
for Condition B:  
Additional training for  
all ASACB personnel  
and all ASACB  
auditors will be  
conducted and  
documented by  
October 21, 2011  
reinforcing the need  
to review the client's  
work instructions or  
take notes or have  
the work instruction  
in hand when  
assessing the client's  
compliance with their  
work instructions

09/27/2011

Assessment of the  
corrective action's  
adequacy relative to  
correcting the root  
cause can take place  
subsequent to  
completion of the root  
cause analysis.  
Additional root cause  
analysis and  
corresponding  
corrective action  
information, as  
applicable, is due by  
October 7, 2011.

Bryan Blunt

Needs  
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10/7/2011

For Condition A:  
AIMS will be notified by the Accreditation Manager to be vigilant in complying with ISO 9001:2008, Clause 5.4.1 by establishing and maintaining specific measurable goals addressing all of their Quality Objective metrics.

For Condition B:  
In addition to the training already specified, the training for all ASACB personnel and all ASACB auditors will also be conducted by the Accreditation Manager and documented by October 21, 2011 reinforcing Human Factors vigilance with respect to:

- Overdependence on using memory alone when documentation media is available
- Lack of Attention to Detail
- The effects Pressure can have in decision making
- The effects Stress can have in decision making
- The effects Overconfidence can have in decision making

For Condition B:  
The ASACB Accreditation Manager will notify AIMS by October 21, 2011 to be vigilant in ensuring all their personnel access and comply with work instructions at point-of-use.

10/11/2011

The corrective action plan addresses the direct and underlying causes of the nonconformity and covers the areas within which the nonconformity was contained.

Bryan Blunt

Fully  
Approved

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