PROCEDURES
ISSUE 1, REVISION 3

BOARD ON CONFORMITY ASSESSMENT COMMITTEE ON
CONDUCT OF CONFORMITY ASSESSMENT ACTIVITIES

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1 SCOPE

1.1 The scope of the Committee on Conduct of Conformity Assessment Activities (C3A2) covers the establishment and implementation of rules governing the conduct of ASME conformity assessment activities. The scope applies to verification of compliance and to evaluation of performance and effectiveness of programs through the development, implementation and review of internal audits, as established by the Board on Conformity Assessment (BCA) under the provisions of B5.3.7 of the ASME By-Laws. The activities of the C3A2 are administered and coordinated by the ASME Codes and Standards Conformity Assessment Department.

1.2 The C3A2 shall establish procedures for conducting ASME surveys, reviews, audits, interviews, investigations and examinations of ASME accreditation and certification activities. Such procedures shall assure consistency and continuity in the conduct and performance of ASME conformity assessment activities, procedural due process, protection of ASME marks, and acceptance of the Applicant’s demonstrated conformance with ASME Codes and Standards.

1.3 The C3A2 shall establish a comprehensive system of planned and periodic audits of the ASME accreditation and certification programs to verify compliance with all aspects of each program’s procedural requirements; and evaluate the program’s performance.

1.3.1 The audits of ASME accreditation and certification programs shall be conducted in a manner that stresses the evaluation of those activities that affect the program’s ability to:

   (a) maintain its credibility and integrity and;
   (b) perform the Society's intended purpose as follows:
       (1) protect the ASME marks and
       (2) bear evidence that ASME has accepted an organization or individual's demonstrated conformance with a Code or Standard.

1.3.2 The characteristics necessary for the ASME accreditation and certification programs to perform the Society's intended purpose are:

   (a) procedural due process, i.e., an established course of action to ensure the rights of those individuals or organizations who participate in and who are affected by the accreditation or certification program;
   (b) effectiveness, i.e., a factor of the program's conformity assessment of an Applicant's demonstrated compliance with the Code or Standard; and
   (c) reliability, i.e., a factor of the consistency and repeatability of a program's conformity assessment.
1.4 The C3A2 shall recommend policies and develop procedures for the qualification of ASME Designees (Auditors or Lead Auditors) to perform certain accreditation and certification activities on behalf of ASME. Such procedures shall assure consistency and continuity in the qualification and certification of individuals as ASME Designees.

1.5 The C3A2 shall serve as the arbitrator to resolve disagreements between the Internal Audit Team and the ASME ISO 9000 Registration program staff regarding corrective action requests and correctives actions taken.
2 RESPONSIBILITIES

2.1 The C3A2 reports to the BCA.

2.2 The C3A2 shall have responsibility for the following areas related to the ASME internal audit program:

(a) to oversee the activities of each Internal Audit Team;
(b) to establish the requirements for internal auditor qualification;
(c) to approve selection of Internal Auditors;
(d) to establish standard operating procedures for the Internal Audit Team
(e) to coordinate internal audits of
   (1) ASME Conformity Assessment Department
   (2) ASME Designated Organizations
   (3) Accreditation and Certification Subcommittees
   (4) surveys, reviews, and certification examinations;
(f) approving internal audit schedules;
(g) to verify, by the Internal Audit Team's examination of objective evidence that ASME Accreditation and Certification programs and procedures are properly implemented;
(h) to provide for Internal Audit Report review prior to distribution;
(i) to evaluate resolution of internal audit deviations;
(j) to evaluate internal audit observations to determine their reportability to BCA.

2.3 The C3A2 shall have responsibility for the following areas related to conduct of accreditation and certification activities:

(a) to make recommendations to the BCA, as appropriate, for improving the Accreditation and Certification program.
(b) to develop standard operating procedures for the conduct of ASME surveys, reviews, audits, interviews, investigations and examinations;
(c) to make recommendations to the BCA, as appropriate, for improving the performance and conduct of ASME surveys, reviews, audits, interviews, investigations and examinations.

2.4 The C3A2 shall have responsibility for the following areas related to criteria for ASME Designees:

(a) to recommend policies for the qualification of ASME Designees;
(b) to develop and maintain standard procedures for the qualification of ASME Designees to perform conformity assessment activities;
(c) to make recommendations to BCA, as appropriate, for improving the qualifications and certification activities for ASME Designees.
3 ORGANIZATION

3.1 GENERAL

3.1.1 The C3A2 shall consist of not less than three nor more than ten voting members. The Chair and Vice Chair shall be considered within this membership. The Secretary, ASME Senior Consultant and Internal Audit Senior Team Leader are not included in the count of voting members.

3.1.2 Members are required to act as individuals and not as representatives of commercial entities, agencies, or special interest groups.

3.1.3 Professional conduct of each member shall be reviewed annually by the Chair with regard to work of the Committee, attention to correspondence, and attendance at meetings.

3.2 CHAIR

3.2.1 The C3A2 Chair shall be nominated by the BCA Chair, with approval by the BCA. The term of office for the Chair shall be three years, concurrent with the term of the BCA Chair.

3.2.2 The Chair shall be an ex-officio member of the BCA, if not currently serving in another capacity, and in such cases, the appointment is subject to approval by the Council on Codes and Standards. The Chair may nominate an alternate to BCA from within the members of the C3A2.

3.3 VICE CHAIR

3.3.1 A C3A2 Vice Chair shall be selected from the voting membership of the Committee. The Vice Chair shall be nominated by C3A2, with approval by BCA.

3.3.2 The term of office for Vice Chair shall be concurrent with the term of the Chair.

3.4 MEMBERS

3.4.1 Members shall be selected by the C3A2 and recommended to the BCA for appointment. Reappointments require only C3A2 approval.

3.4.2 Each member of the committee should recommend a person, within the same interest category, as an alternate to serve in the absence of, or at the direction of, the member. Appointment of the alternate shall be by the same procedures as for members (see 3.4). Alternates shall have the same privileges and responsibilities as members when serving on the member’s behalf. Service of alternates terminate
(a) Upon request of the member;
(b) Upon request of the alternate; or
(c) Within six months, when the person represented by the alternate is no longer a member of the committee.

3.4.3 Members shall serve terms not to exceed five years, staggered, so that the terms of no more than two expire in any one year. Members may serve more than one term.

3.4.4 The Internal Audit Senior Team Leader shall be designated by the ASME Associate Executive Director from the ASME Codes and Standards Directorate. The Internal Audit Senior Team Leader shall be an ex-officio member of C3A2, without vote.

3.4.5 ASME Internal Auditors are invited to attend and participate in meetings of the C3A2 without vote.

3.4.6 The ASME Senior Consultant provides liaison between ASME Team Leaders and C3A2, and attends C3A2 meetings, as necessary, as a staff person without vote.

3.4.7 Members shall provide signed acknowledgment for compliance with the Society’s policies on confidentiality, conflict of interest, and code of ethics. Compliance statements shall be maintained on file by the ASME staff.

3.5 **SECRETARY**

The Secretary shall be designated from the ASME Codes and Standards Directorate, and shall serve without vote.
4 DUTIES

4.1 OFFICERS

4.1.1 The Chair shall preside at meetings of the Committee and shall perform such other duties as are customarily assigned to that office.

4.1.2 The Chair of the C3A2 shall report to the BCA on matters related to the ASME Accreditation and Certification programs. The Chair provides BCA with recommendations on matters which may require consideration or action by the BCA.

4.1.3 The Vice Chair shall, in the absence of the Chair, fulfill the duties of that office.

4.2 MEMBERS

The duty of each member is to give thorough consideration to each subject brought before the Committee for proper action, and to assist generally in carrying out the functions of the C3A2.

4.3 SECRETARY

4.3.1 The Secretary shall prepare the agenda and record minutes of all meetings of the C3A2 and shall perform other duties as are customarily associated to such an office or required by these procedures.

4.3.2 The Secretary shall receive and maintain all documents relative to the C3A2 activities, and distribute letter ballots and correspondence on behalf of the C3A2.

4.3.3 In the absence of the Chair and Vice Chair at a meeting of the C3A2, the Secretary shall take the chair for the purpose of nomination and election of a Chair Pro Tem, who shall then preside at that meeting.
5 MEETINGS

5.1 FREQUENCY

The C3A2 shall hold meetings as required by its program of work and responsibility on a date and at a location determined by the C3A2. It may hold meetings at other times at the call of an Officer or at the request of not less than three members of the C3A2. At least one meeting a year shall be held, preferably in conjunction with a BCA meeting.

5.2 ACCESS

Because of the sensitive nature of the C3A2 activities, portions of meetings may be closed to all persons except C3A2 members, ex-officio members, internal auditors, ASME staff members and the BCA Chair.

5.3 QUORUM

At any meeting of the C3A2, a quorum is established when fifty percent or more of the voting members are present. In the absence of a quorum, the minutes of the meeting and any voted action shall be subject to letter ballot approval by the membership.

5.4 CONFIDENTIALITY

5.4.1 All discussions and voting held by the C3A2 in the process of arriving at a consensus with regard to internal audit deviations and observations shall be confidential.

5.4.2 Official communication with the organization being audited is the responsibility of the Secretary. In all cases, Internal Audit Reports, minutes, agendas, and material distributed related to an internal audit are to be considered confidential and discussion with other than members of the C3A2 and ASME Internal Auditors is prohibited.

5.5 VOTING REQUIREMENTS

5.5.1 Approval of actions relating to internal audits shall require two-thirds approval of the C3A2 membership present and voting at a meeting, exclusive of those not voting, i.e. having a conflict of interest.

5.5.2 Approval of administrative actions require a simple majority affirmative vote of the C3A2 membership present and voting at a meeting, exclusive of those not voting, i.e. having a conflict of interest.
6 TASK GROUPS

6.1 FORMATION

When the C3A2 agrees on the need, or at the discretion of the Chair, a Task Group and Task Group Chair shall be appointed by the C3A2 Chair. A Task Group may be selected to handle one or more special subjects or assignments. A member of the Task Group may be appointed as Task Group Secretary by the Task Group Chair.

6.2 MEMBERSHIP

Task Group membership shall be selected from the C3A2 when confidentiality is an issue. If confidentiality is not an issue, individuals not currently on C3A2 may be asked to serve on the Task Group. ASME Internal Auditors or Internal Audit Team Leaders may be requested to serve on Task Groups. Task Groups shall meet as often as the workload requires.

6.3 DISCHARGE

At any time considered beneficial to the operation of the C3A2, the C3A2 Chair may discharge the Task Group or assign new members if necessary.

6.4 VOTING

6.4.1 At Task Group meetings, when discussion indicates general agreement on any question, the Task Group Chair shall call for a formal vote. All voted actions shall be recorded in the meeting minutes.

6.4.2 When two-thirds of the membership of the Task Group register approval in a recorded vote, the action shall be considered as a recommendation to the C3A2 from the Task Group. The Task Group Chair shall submit voted recommendations to the C3A2.

6.4.3 If the two-thirds affirmative vote is not received in the recorded vote, the action is defeated and the question must be reconsidered.
7 LETTER BALLOTS

7.1 AUTHORIZATION

Letter ballots may be authorized by an Officer, by a majority vote of members present at a meeting, or by a petition of three members of the C3A2.

7.2 CONFIDENTIALITY

In all cases, Internal Audit Reports and other material included in, or with, a letter ballot are to be considered confidential and discussion of their contents with other than members of the C3A2 and ASME Internal Auditors is prohibited.

7.3 BALLOT PROCEDURES

7.3.1 The Secretary shall ensure that all pertinent information is on the letter ballot, or attached to the letter ballot, to permit proper consideration by the membership. The action to be voted on shall be clearly identified and stated on the letter ballot.

7.3.2 The letter ballot will contain "approved," "not approved with reason," "abstain with reason," and "not voting with reason" as the forms of response, with "not voting with reason" to be used for conflict or apparent conflict of interest.

7.3.3 A "Not Voting" response signifies neither approval nor disapproval, but the total C3A2 voting membership is reduced by one.

7.3.4 "Abstain" signifies neither approval nor disapproval. The total Committee voting count is not affected.

7.3.5 The voting period for letter ballots shall normally be thirty days from date of issue. Expedited or extended ballot periods may be authorized by the C3A2 Chair. Ballots not received within the designated voting period will be considered as "Not Returned." "Not Returned" signifies neither approval nor disapproval. The total Committee voting count is not affected.

7.3.6 The Secretary shall record the results of all letter ballots including comments and report to the C3A2 for resolution and action as required.
7.3.7 Approval of actions related to internal audits require a two-thirds affirmative vote of the Committee membership exclusive of those listed as "not voting". When the action is submitted for letter ballot, a single negative vote or lack of two-thirds affirmative vote requires reconsideration by letter ballot or at a meeting. Reconsideration ballots will be considered approved if affirmative ballots are received from two-thirds of the Committee membership, exclusive of those listed as not voting, i.e. having a conflict of interest.

7.3.8 Approval if administrative actions, such as procedures or personnel, shall require a simple majority of the Committee membership, exclusive of those listed as “not voting”.
8 INTERNAL AUDIT TEAM COMPOSITION

8.1 The Internal Audit Senior Team Leader shall be designated by the ASME Associate Executive Director from the ASME Codes and Standards Directorate.

8.2 Prospective ASME Internal Auditors may be selected from Federal Agencies that include ASME Accreditation or Certification programs in their regulatory process, organizations that utilize products or services provided under an ASME Accreditation or Certification program and that does not otherwise participate in an ASME Accreditation or Certification program, independent consultants familiar with the ASME accreditation and certification process, or ASME staff independent from Accreditation and Certification programs being audited.

8.3 Responsibilities of the Internal Audit Senior Team Leader and Internal Audit Team Leader shall be in accordance with Appendix A and the Internal Audit Team Procedures.

8.4 Members of the C3A2 and BCA shall not participate in internal audits except as observers or representatives of the audited organization. Members of the C3A2 and BCA shall not vote on any action involving an internal audit in which they participated.
9 INTERNAL AUDIT REPORTS

9.1 The Internal Audit Team Leader shall prepare the Internal Audit Report. The Internal Audit Report should reflect the performance-based aspects of the internal audit and communicate deviations and observations. Deviation and observation are defined as follows:

(a) Deviation - A departure from a specified requirement
(b) Observation - Identifies a specific concern that affects the program’s procedural due process, effectiveness, or reliability and includes a recommendation that achieves improved performance.

9.2 The Internal Audit Report shall contain the following information:

(a) location, date, and type (no reference to Applicant, if any);
(b) Team Members and others in attendance;
(c) deviations and observations;
(d) status of previous deviations and any open items, if applicable;
(e) areas, activities, and elements observed and evaluated;
(f) procedural due process, effectiveness, and reliability of the program;
(g) performance-based reasons for each deviation or observation.

9.3 Team members who do not agree with the decisions of the majority may file a Minority Report. Minority Reports shall define the area of disagreement. The Minority Report shall be filed at the time of, and as part of, the final Internal Audit Report.

9.4 The Internal Audit Team Leader shall submit Internal Audit Reports to the Internal Audit Senior Team Leader for review within thirty days after the internal audit.

9.5 The C3A2 Secretary shall provide the Internal Audit Team Leader with the ASME Review or Survey Report, where applicable. The Internal Audit Team Leader may prepare a Supplementary Report based on the contents of the ASME Review or Survey Report.

9.6 Reports with no deviations or observations shall be submitted to the C3A2 Chair with copy to the C3A2 Secretary and are to be reported to the C3A2.

9.7 Reports with deviations and/or observations shall be forwarded to the C3A2 Chair for release with copy to the C3A2 Secretary.
9.8 The C3A2 Secretary shall forward the released Report to the contact person listed on the Internal Audit Report. The letter of transmittal to the responsible party shall include the response date as established by the C3A2 Chair and the response requirements of 10.1.1 and 10.2.1. Transmittal of the Internal Audit Report shall be reported to the C3A2, with copies distributed to the BCA Chair and others as determined by the C3A2 Chair.

9.9 Reports not approved for release by the C3A2 Chair shall be included in the agenda for the next C3A2 meeting or submitted for letter ballot approval of the C3A2.
10 RESOLUTION OF DEVIATIONS AND OBSERVATIONS

10.1 The C3A2 shall evaluate and approve resolutions to deviations.

10.1.1 All deviations require a written response. The response shall include

(a) cause for deviations or, if contested, basis for disputing reported deviation;
(b) corrective action taken or to be taken to resolve deviation;
(c) corrective action to prevent recurrence;
(d) date when full compliance will be achieved.

10.1.2 The C3A2 Secretary shall perform follow-up action until an acceptable response is received.

10.1.3 If an acceptable response to a deviation is not received after repeated attempts, the C3A2 shall, after a majority vote, advise BCA of the situation.

10.2 The C3A2 shall evaluate and approve responses to observations.

10.2.1 A written response to observations shall be requested in the letter described in 9.8. The response shall include

(a) acknowledgment of the identified performance weakness, or, if contested, the basis for disputing the validity of the observation, stated in terms of the program’s performance;
(b) the steps or measures that have been taken or will be taken to improve the program’s performance;
(c) the date when the steps or measures will be completed.

10.2.2 The C3A2 Secretary shall perform follow-up action until an acceptable response is received.
11 RECORDS

11.1 The Secretary of the C3A2 shall maintain the internal audit files, including schedules, reports, resolution of deviations, and other applicable documentation at least five years or until completion of a subsequent internal audit of that activity, if earlier.

11.2 The Secretary of the C3A2 shall maintain files for other activities of the Committee in accordance with the ASME Codes and Standards policy on record retention.

12 PARLIAMENTARY PROCEDURES


13 REVISIONS

Revisions to these procedures are subject to approval by the BCA.
APPENDIX A – RESPONSIBILITIES OF THE INTERNAL AUDIT SENIOR TEAM LEADER AND INTERNAL AUDIT TEAM LEADER

A.1 INTERNAL AUDIT SENIOR TEAM LEADER

Under the direction and guidance of the C3A2, the Internal Audit Senior Team Leader shall be responsible for the following:

(a) appointing an Internal Audit Team from a list of qualified ASME Internal Auditors, maintained by ASME staff, and assigning one Internal Auditor as Internal Audit Team Leader, and being guided by the scope of the audit in determining the size and composition of the Team;
(b) preparing a procedure for qualification of Internal Auditors for review and approval by C3A2;
(c) recommending qualified candidates to the C3A2 for approval as Internal Auditors and Internal Audit Team Leaders;
(d) indoctrinating and training Internal Auditors to established audit procedures;
(e) evaluating and recommending C3A2 action on requalification of Internal Auditors and Internal Audit Team Leaders;
(f) establishing and maintaining a tracking system for the resolution status of deviations and observations;
(g) preparing or arranging the preparation of a written internal audit plan for each internal audit activity;
(h) reviewing and transmitting the Internal Audit Reports to the C3A2 Chair, with a copy to the C3A2 Secretary;
(i) proposing internal audit schedules.

A.2 INTERNAL AUDIT TEAM LEADER

Under the direction and guidance provided by the Internal Audit Senior Team Leader, the Internal Audit Team Leader shall be responsible for the following:

(a) reviewing internal audit plans and checklists;
(b) while performing an internal audit, officially representing the C3A2 in all matters;
(c) directing the activities of Internal Audit Team Members, including team assignments;
(d) conducting pre- and post-audit meetings with representatives of the organizations or programs being audited;
(e) conducting any interim briefings with the audited party if required by the nature of the audit subject(s);
(f) preparing the Internal Audit Report and submitting report to the Internal Audit Senior Team Leader;

(g) for internal audits of surveys or reviews, preparing a Supplementary Report, if necessary, upon receipt of the ASME Review or Survey Report, and submitting the Supplementary Report to the Internal Audit Senior Team Leader.