



What You Need to Know About Nadcap[®]



PERFORMANCE REVIEW INSTITUTE

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On behalf of the Supplier Support Committee Leadership Team (SSC LT), I would like to welcome you to the Nadcap program.

If I may offer some advice to you, I encourage you to get as fully involved in Nadcap, including meeting attendance, as your time and resources allow. You can attend the Task Group meetings and participate in discussions about audit checklist criteria and Task Group procedures; your voice will be heard. When you attend your second Task Group meeting you have the opportunity to become a Supplier Voting Member of the Task Group which provides you with voting privileges on audit criteria and procedures.

In addition, opportunities abound for involvement with SSC sub-teams that work to improve the Nadcap program; you do not have to attend meetings to participate on SSC sub-teams.

Whether or not you attend the meetings, please take advantage of the many helpful on-line resources.

Many of these resources are referenced in this handbook with an explanation about where they are relevant in the Nadcap journey.

On eAuditNet, you can review the minutes of previous Task Group meetings and various supplieroriented presentations given at meetings.

From the SSC page (https://p-r-i.org/nadcap/nadcap-structure) you can request an experienced mentor to help navigate through the program.

Most importantly, communicate with us and let us know what non-technical concerns you have and what issues you face using the on-line Supplier Request form (https://media.p-r-i.org/assets/2019/09/30094809/SSC-Request-Form-17Jan17.pdf)

The SSC exists to support you throughout your Nadcap experience. We seek to provide support to, and advocacy for, all Nadcap Suppliers, new and experienced, for those who attend meetings and those who cannot.

All of us involved in the Nadcap program - Suppliers, Subscribers, Auditors, and PRI staff - know that suppliers are the ultimate key to the success of the aerospace industry and the Nadcap program. We on the SSC are honored to serve you and look forward to supporting your successful participation in the Nadcap program.

Thank you, and please don't hesitate to let us know how we can help you to be successful in your Nadcap journey.

Sincerely,

Dale Darman

Dale Harmon



P.S. You can contact me at <u>NadcapSSC@p-r-i.org</u> if you have any questions or if you have any suggestions to improve this document.



Nadcap Overview

Prior to 1990, the major aerospace companies were auditing their own Suppliers for technical proficiency in areas such as non-destructive testing, welding, and heat treating. This meant a significant workload for the Subscribers, duplicate audits for the Suppliers, and auditors were often forced to become generalists to accommodate the workload.

In 1990, the National Aerospace and Defense Contractors Accreditation Program (NADCAP) was established by key aerospace industry and US government representatives, administered by the not-for-profit Performance Review Institute (PRI). As Nadcap grew internationally, it changed from an acronym (NADCAP) to a brand name (Nadcap®).

Today, Nadcap represents an unprecedented, cooperative industry effort to improve quality while reducing costs throughout the aerospace and defense industries. It is an approach to conformity assessment that brings together technical experts from all over the world to establish requirements for accreditation, approve Suppliers, and define operational program requirements.

Unlike traditional assessment programs, Nadcap is an industry-managed program. It promotes a standardized approach to quality assurance and a reduction in redundant auditing throughout the aerospace industry. Through Nadcap, industry has joined forces to develop a program that:

- Establishes stringent industry-consensus standards that satisfy the requirements of all participants
- Replaces routine Supplier auditing with one program that is approved through a consensus decision-making process by members from the user community
- Conducts more in-depth, technically superior, special-process audits
- Improves Supplier quality throughout the industry through stringent requirements
- Reduces costs through improved standardization
- Uses technically expert auditors to ensure process familiarity
- Provides more frequent audits for Subscribers and fewer audits for Suppliers

Is it a quality systems audit?

A Nadcap audit differs significantly from an audit for general quality or for compliance to an ISO standard. With those types of audits, the following generic quality question may be used regardless of the nature of the work being audited:

Does the Supplier define the processes employed for calibrating, inspection, measuring, and testing?

To highlight the depth of a Nadcap audit, the following question would be used for non-destructive testing only - each special process would have its own specific question:

Are the fluorescent penetrant inspection (FPI) dryer ovens calibrated every three months at multiple points across the usable range?

Nadcap Overview

A web poll conducted by the Performance Review Institute in 2019 showed that:

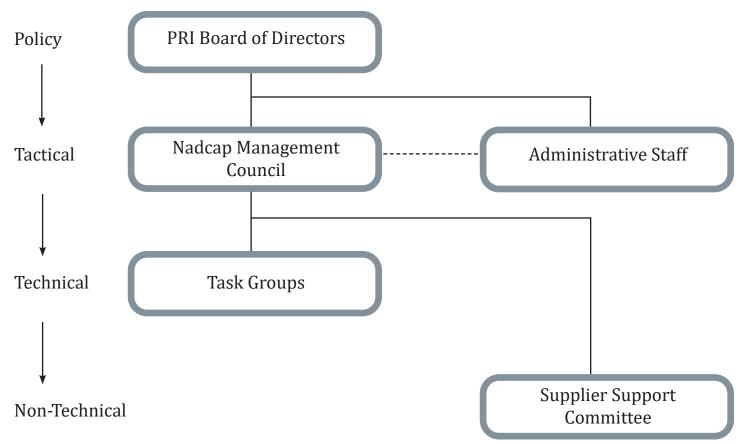
- 94% of Suppliers feel that Nadcap accreditation has added value to their organization.
- 91% have observed an improvement in quality as a result of participation in the Nadcap auditing process.

87% of Suppliers report a quality improvement in the areas for which they are Nadcap accredited.

Source: Supplier Survey 2015

- 70% report that participating in the Nadcap program has helped to decrease their product defect rates
- 85% of Suppliers claim improved customer satisfaction can be credited to participation in the Nadcap program.

Nadcap Organization Structure





Nadcap Supplier Support Committee (SSC)

The SSC exists to represent and be the voice of the Supplier community. The SSC Mission is "to represent the Supplier community and work with the Nadcap Management Council (NMC) to enhance the effectiveness and economical value of the Nadcap system for the mutual benefit of Suppliers and Subscribers". The SSC works with the NMC on issues directly related to Suppliers.

The Committee is made up of active Nadcap accredited Suppliers who are willing to help new Suppliers through the process, as well as assisting experienced Suppliers to establish, maintain and improve their accredited processes.

The SSC is also comprised of a Supplier Support Committee Leadership Team (SSC LT) which reviews and addresses non-technical concerns raised by Suppliers. The SSC LT members include:



Lei Bao **NCS** Testing



Dale Harmon CTS Inc.



Jonathan Hebben Ronald Hendriks Monogram **Aerospace Fasteners**



Chemetall GmbH



Shelly Lawless Meyer Tool, Inc.



Steve Payne, Praxair Surface Technologies



Dennis Reidy C.I.L. Inc

Nadcap Meeting Supplier Support

The SSC sponsors several face-to-face sessions at the Nadcap meetings. The Supplier Tutorial provides an overview of the Nadcap program, presented by a Supplier; the SSC meeting is a forum for discussion and report-out on important issues for Suppliers; and there is also an informal Ouestion & Answer session where you can meet Performance Review Institute Staff. Check the meeting agenda for details.



Bruno Roost Franke Industrie AG

Mentoring Program

The SSC offers a Supplier Mentoring program, dedicated to assisting those Suppliers who are new to the process and/or those needing assistance navigating the Nadcap system by providing names and contact information of experienced Nadcap Suppliers. If you would like to work with a Mentor, please send an email to <u>NadcapSSC@p-r-i.org</u>.

If you would like to receive additional information regarding the SSC, please send an email to NadcapSSC@p-r-i.org.

Nadcap Supplier Support Committee

SSC Staff Support Team

To support the SSC - and the interests of the Suppliers - there are Performance Review Institute staff in the Americas office who work on SSC projects. Please contact them if you have any queries.



Jim Lewis, Vice President of Engineering and Vice President of Nadcap. He is based at the Performance Review Institute International HQ in Pittsburgh, PA. T: + 1 724 772 8688 E: jiml@p-r-i.org



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Cynthia Nixon is Senior Coordinator, Support Services. She is based at the Performance Review Institute International HQ in Pittsburgh, PA. T: + 1 724 772 8659 E: cnixon@p-r-i.org

Customer Focus

The Performance Review Institute's Executive Vice President and Chief Operating Officer, Jay Solomond, explains the organization's stakeholder satisfaction philosophy.



"As a customer, you are an intrinsic part of the Nadcap program. We continually strive to anticipate and meet your needs, so that you can be fully satisfied with the services we provide. We want to create and add value, for both your company and the wider industry, now and in the future. That is why your ongoing feedback is important to us; to understand your evolving requirements, and to assess how we are performing.

"There are always opportunities for improvement in any organization, and we are no different in that regard. By seeking and listening to your views, we become better positioned to provide you with a continued high-quality service, that is relevant and fit-for-purpose. To that end, I would encourage you to share your constructive feedback with Jim Lewis, Vice President of Engineering and Vice President of Nadcap at jiml@p-r-i.org."

Download the PRI Aerospace Dictionary

Confused by the terminology and acronyms? There is a free PRI Aerospace Dictionary available online at <u>www.eAuditNet.com</u> in the Resources - Documents - Public Documents - General Documents section.



Special Processes, Products and Systems Audited by Nadcap

Aero Structures Assembly (ASA)

Hole Preparation, Fastener Installation, Shimming, Electrical Bonding/Bushing/Bearing Installation

Chemical Processing (CP)

Anodizing, Chemical Cleaning, Chemical Milling, Conversion/Phosphate Coating, Etching, Laboratory Evaluation, Paint/Dry Film Coatings, Plating, Stripping, Surface Prep Prior to Metal Bond, Surface Treatment/ Passivation, and Vacuum Cadmium & Aluminum IVD

Coatings (CT)

Thermal Spray, Vapor Deposition, Diffusion Coating Process, Stripping of Coated Parts, Coatings Evaluation, Plating of Coated Parts, Heat Treating of Coated Parts, and Grinding of Coatings

Composites (COMP)

Compression Molding, Core Processing, Kitting Service Provider, Liquid Resin Processing, Metal Bond, and Prepreg/Adhesive Bonding/Resin Film Infusion

Conventional Machining as a Special Process (CMSP)

Holemaking, Turning, Grinding, Broaching, Milling, and Edge Treatment

Elastomer Seals (SEALS)

Rings, Plate Seals/ Rubber Bonded to Substrates, Molded Shapes, Compression Seals, and Compounding

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Staff Engineer Tip

Attend the Nadcap meetings when you can, to contribute to checklist development. ~ *Mike Graham*



Special Process, Products and Systems Audited by Nadcap

Electronics (ETG)

Printed Boards, Printed Board Assemblies, and Cable and Harness Assemblies

First Article Inspection (FAI)

Phil Ford, Principal Staff Engineer - Lead **Susan Frailey**, Principal Staff Engineer +1724-772-4243 <u>sfrailey@p-r-i.org</u>

Susan Frailey, Principal Staff Engineer - Lead +1 724-772-4243 <u>sfrailey@p-r-i.org</u>

Fluid Distribution Systems (FLU)

Hose Manufacturing, Fittings and Other Machined Components, Couplings, Hose Assembly, Value Added Hose Assembly Distributors, and Titanium Tubing Manufacturers

Heat Treating (HT)

Metal Systems, Heat Treating Process, Heat Treating Equipment, Brazing, and Hot Forming

Staff Engineer Tip

You will gain the most benefit from Nadcap if you actively participate. Learn how to become a Task Group Voting Member.

Materials Testing Laboratories (MTL)

ISO/IEC 17025 Equivalency (AC7006), Chemical Analysis, Mechanical Testing, Metallography (Micro & Macro), Hardness, Corrosion, Microhardness, Fastener Testing and Specimen Heat Treating, and Test Specimen Preparation

Measurement and Inspection (M&I)

Coordinate Measuring Machine (CMM), Laser Tracker, Articulating Arm, Mass Airflow Measurement of Turbine Engine Parts, and General Inspection Keith Purnell, Principal Staff Engineer - Lead +1 724-772-8685 kpurnell@p-r-i.org

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Forgings

Non Metallic Materials Manufacturing (NMMM)

Raw Material Manufacturing of Resin, Prepreg, Adhesive Film, Core, and Fiber

Nonconventional Machining & Surface Enhancement (NM/SE)

Electrochemical Machining (ECM), Electrochemical Grinding (ECG), Electrical Discharge Machining EDM), Laser Beam Machining (LBM) Laser Part Marking (LPM), Spark Erosion Grinding (SEG), Abrasive Water Jet Machining (AWJM), and Computer Controlled Peening, Automated Peening, Peen Forming, Flapper Peening, and Manual Peening

Non-Metallic Materials Testing (NMMT)

Mechanical Testing, Physical Testing, Chemical Testing, Thermal Testing and Flammability Testing for Class A: Composites, and Class B: Adhesive/Adhesive Primers

Non-Destructive Testing (NDT)

Magnetic Particle, Liquid Penetrant, Ultrasonic, Radiography, Digital Radiography (DDA & CR), and Remote Image & Film Viewing

VP Engineering Tip

Read the relevant procedures before your audit so you clearly understand your role in the Nadcap audit process. - Jim Lewis



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Special Process, Products and Systems Audited by Nadcap

Sealants (SLT)

Manufacture, Packaging, and Application of Aerospace Sealants

Welding (WLD)

Additive Manufacturing (Laser and electron beam powder bed metallic), Diffusion Welding, Electron Beam Welding, Flash Welding, Friction/Inertia Welding, Fusion Welding (includes GTAW, PAW and Foundry in-process/casting repair), Laser Welding, Percussion Stud Welding, Resistance Welding (spot, seam and projection), Torch/Induction Brazing, Welder/ Welding Operator Qualification, and Evaluation of Welds (bend test and metallographic)

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Aerospace Quality Systems (AQS)

Nadcap recognizes valid 9100 and 9110 quality system approvals, and other equivalent translations as recognized by IAQG, performed and certified by registrars that are approved and listed in the IAQG OASIS database (www.iaqg.org/oasis). The scope of 9100 and 9110 accreditations should not contain the exception to 8.5.1.2 Validation of Control of Special Processes or 7.5.2 Validation of Processes for Production and Service Provision, as applicable.

In addition, Nadcap recognizes ISO/IEC 17025 and AC7006 for testing laboratories, including nondestructive testing laboratories and etch audits performed in support of nondestructive testing laboratories. The ISO/IEC 17025 scope of accreditation must include testing and be from an approved ILAC accreditation body. AC7006 accreditation must be through the Nadcap Materials Testing Laboratories Task Group. Where no existing recognized quality system approval exists, Nadcap requires AC7004/AC7006 assessment to support the special process accreditation.

Task Groups may define quality system requirements which are more stringent than AC7004 by documenting the requirements in both the Nadcap Audit Criteria and in the Task Group specific OP 1114 Appendix.

You can contact **Susan Frailey**, Principal Staff Engineer - Lead +1 724-772-4243, <u>sfrailey@p-r-i.org</u> with questions.

Do you have a Task Group question?

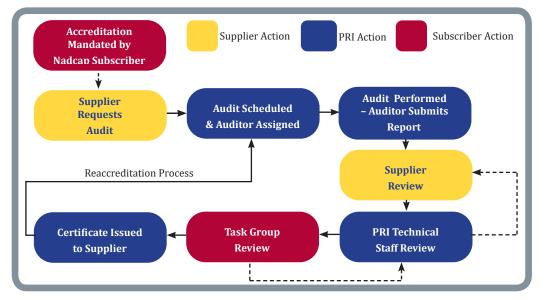
Task Groups have SSC Task Group Representatives - Suppliers who act as a liaison between the SSC and the Task Group. They can advise you on Task Group related inquiries. For information contact <u>NadcapSSC@p-r-i.org</u>



Nadcap Audit Flowchart

The Nadcap process typically begins with a notification from a customer to the Supplier that they should attain accreditation, although some companies choose to pursue Nadcap accreditation without prompting.

The Supplier contacts the Performance Review Institute to request the audit, which is scheduled according to the timeframe and content expectations of the Supplier and the customer. An appropriate auditor is assigned. Nadcap auditors typically have over 30 years' experience in their field and are contracted after a rigorous selection process into which the Subscribers and Suppliers input.



After the audit, a report is submitted electronically via eAuditNet, the audit software program used by Nadcap. The Supplier has an opportunity to respond to any non-conformances identified and the report, with responses reviewed by the relevant Performance Review Institute Staff Engineer. *

When the Staff Engineer is satisfied that the root cause of all non-conformances has been identified and sustaining corrective action has been implemented, the entire report is submitted to the special process Task Group. This body of Nadcap Subscribers, who are also experts in the special process, verify the conclusion of the Staff Engineer and approve the audit for certification.

At any stage, the Staff Engineer or Task Group may request more information before progressing the audit to the next stage.

* A Staff Engineer acts as a single point of contact between PRI and Suppliers, clarifying checklist questions, audit responses and anything else to do with the Nadcap special processes.

When can I contact a Staff Engineer?

You can contact a Staff Engineer when you have doubts about pre-audit checklist answers or the Staff Engineer's expectations of NCR responses. Staff Engineers will also answer questions related to Task Group operations and any questions related to Nadcap.

When can I not contact a Staff Engineer?

Staff Engineers cannot be asked for technical consultations. They will not discuss audit results or advise on how to respond to findings. What they can do is provide some direction in terms of the expectations.

Nadcap Reaccreditation

Nadcap accreditation is an ongoing activity. Once initial certification has been issued, the next audit is usually automatically scheduled. Once the audit has been scheduled, notification is sent via email to you and the assigned auditor. Please check as soon as possible if the scheduled dates are not suitable and contact the Performance Review Institute if they need to be changed.

Commodities with merit, initial accreditation is based on a twelve-month cycle. However, the actual period of initial accreditation depends on audit performance. For example: if the initial audit takes place on 1 October 2021, the expiry date of the accreditation will be 28 February 2022 - regardless of when accreditation is actually granted. So, for the well-prepared Supplier who is audited on 1 October 2021, receives zero or few non-conformances and gains accreditation on 1 December 2021, the accreditation period is actually longer than twelve months. But for the ill-prepared Supplier who is audited on 1 October 2021, receives a number of non-conformances and gains accreditation on 15 January 2022, the accreditation period is actually shorter than twelve months. The same process applies to reaccreditation audits.

It all depends on effectively preparing for the audit. For commodities without merit, please see commodity specific OP 1114 Appendices for details.

eAuditNet Overview

eAuditNet is an online system for everything relating to Nadcap audits. The biggest benefit of eAuditNet is the reduction in operating costs for the industry:

• eAuditNet has eliminated paperwork

Nadcap Supplier Audit Guide

The SSC has put together a list of useful links to help you navigate through the Nadcap process. View the Supplier Audit Guide at EAN / Resources / Documents / Supplier / SSC Documents

- eAuditNet facilitates real-time interaction, regardless of location or time 24 hours per day, 365 days per year
- All stakeholders share responsibility in the knowledge that eAuditNet provides the structure to function efficiently and effectively

Suppliers use eAuditNet extensively: from requesting a quote to scheduling an audit; from carrying out thorough audit preparation to responding effectively to non-conformances after the audit in order to gain accreditation promptly. The site houses many useful documents to help you navigate the Nadcap process: User Guides, Tutorials, and other helpful Supplier documents. Just complete the free registration at

Is Your eAuditNet Profile Up To Date?

Please keep your contact details up-todate on eAuditNet to ensure you receive important information regarding your audit. Please notify Performance Review Institute Scheduling of any changes (see page 21). www.eAuditNet.com and go to the Documents application under Resources. In addition, eAuditNet also contains the online Qualified Manufacturers List (QML), which is a searchable database of certified Nadcap Suppliers. Procurement can use the QML to research and contact Nadcap accredited potential Suppliers.



Frequently Asked Questions

Q: Should my company get Nadcap accreditation?

This is a key question and it's really one that must be resolved between you and your customer/s. Most aerospace Suppliers pursue Nadcap accreditation because it has been mandated by their customer/s, although some make the decision independently. It is up to you to balance the needs of your customer/s and your business with the demands of the Nadcap audit.

Q: What are the benefits of Nadcap accreditation?

A web poll conducted by the Performance Review Institute in 2019 showed that:

• *94% of Suppliers feel that Nadcap accreditation has added value to their organization.

"Becoming familiar with the Nadcap Operation Procedures (OP's) is critically important to understanding how the program works and ensures that requirements are not missed." *Justin Rausch, Staff Engineer, PRI*

- *91% have observed an improvement in quality as a result of participation in the Nadcap auditing process.
- *70% report that participating in the Nadcap program has helped to decrease their product defect rates
- *85% of Suppliers claim improved customer satisfaction can be credited to participation in the Nadcap program.

Q: If my company decides to become Nadcap accredited, what do we need to do next?

The first step is to contact Performance Review Institute Scheduling (see page 21) to request the audit. They will give you access to eAuditNet so you can access the relevant audit checklists and associated reference material to help in your audit preparation. They will also provide you with a quote. It is recommended that you conduct a self-audit using the Nadcap audit checklist/s and implement sustaining root cause corrective actions on any non-conformances you identify. When you feel you are prepared - or you are confident in the timeline you have established for your audit preparation - please contact the Performance Review Institute to arrange the initial audit.

Q: How long does Nadcap accreditation last?

Initial accreditation is linked with the date of the audit, not the date on which accreditation is granted. The table below details the dates. For further clarification please review the section on reaccreditation (see page 13) or alternatively contact Performance Review Institute Scheduling to ask any questions.

What month is your audit?	Your accreditation will expire the following year on:
October, November, December	February 28
January, February, March	May 31
April, May, June	August 31
July, August, September	November 30

Q: What is the Supplier Merit Program?

The Supplier Merit Program awards reduced scope and/or extended frequency audits to Suppliers based on audit performance, determined by the relevant Task Group.

Initial audits shall have an accreditation period of 12 months from the first quarter in which it is eligible for review. The first two (2) reaccreditation audits shall have an accreditation period of 12 months from the previous expiration. Subsequent reaccreditation audits shall be awarded 12, 18 or 24 months based on Supplier "Sales have increased more than 200%. Earlier we ...were known only in India ... After Nadcap we have worldwide recognition ...our customer base was only 5 earlier and after Nadcap our customer base has increased to 15." Source: Nadcap 20th Anniversary Survey, 2010

performance. Note that AQS and MTL do not have a merit program.

Q: Are the rules governing the Nadcap audit process published anywhere?

Yes, the program is governed by a Program Document and Operating Procedures:

- 1. Program Document 1100 Nadcap Program Requirements (PD 1100) A policy level document defining the Nadcap program.
- 2. Nadcap Operating Procedures (OP 11XX and Appendices) Documents detailing the specific procedures by which Nadcap operates.

You can access these via <u>www.eAuditNet.com</u>. For the Program Document, please go to Resources – Documents – Procedures and Forms – Nadcap Program Document. For all Nadcap Operating Procedures, please go to Resources – Documents – Procedures and Forms – Nadcap Operating Procedures.

Q: Is there any kind of pre-audit support available from the Performance Review Institute?

Yes, in addition to the training (see page 17), you can request a pre-assessment audit using a Nadcap auditor BEFORE the actual Nadcap accreditation audit. A Nadcap auditor will visit your site to conduct this audit. All of the data from the audit is left with the Supplier. There is no need to close out any findings. The only findings which will be sent to Subscribers are findings which may potentially impact hardware. Please contact Performance Review Institute Scheduling for more details (see page 21).

There are more frequently asked questions on the Performance Review Institute website (<u>www.p-r-i.org</u>) but please do not hesitate to contact any member of the Performance Review Institute staff directly if you have a question.



Nadcap Meetings

Nadcap meetings take place three times per year and function as a forum for Nadcap Subscribers and Suppliers to ensure continual improvement in special process and product quality in the aerospace industry.

All Nadcap participants are encouraged to attend the meetings to improve their understanding and experience of the Nadcap program. The meetings also provide valuable learning and networking opportunities.

The meeting schedule, agendas and minutes are posted in the Nadcap meetings section. Path: eauditnet > Resources > Documents > Meeting Information









Photos from Top: SSC Helpdesk in Pittsburgh (2019); SSC members at the Nadcap meeting in Pittsburgh (2019); Task Group meeting in Pittsburgh (2019); Nadcap Management Council meeting in Pittsburgh (2019).

Training Opportunities

<u>PRI Training</u> offers professional development programs and managed learning resources to improve the quality of personnel, products and processes through public, virtual and onsite courses and memberships. Custom learning solutions, including onsite learning and hosted learning, are also available. <u>Contact PRI Training</u> staff for more information.

PRI Training offers courses during each Nadcap meeting at a reduced registration rate for the benefit of the aerospace industry special processors. Course offerings and registration details are available on the <u>PRI Training website</u>. The Agenda-at-a-Glance will also include PRI Training course offerings for each Nadcap meeting. To remain up-to-date on all PRI Training news and opportunities please follow PRI Training's LinkedIn account.

PRI Training Delivery Methods:

Public Session: recommended for companies with a small number of individuals who require training. Training is conducted by subject matter experts who come to the classroom with content expertise, industry experience, and on-the-job know-how. This also affords attendees the opportunity to network with peers from key industry players from around the world.

Onsite Training: recommended for companies with multiple individuals who require training. Customized training is scheduled with a PRI Training Instructor to conduct one or more of the courses detailed in the PRI Training catalogue (available on the <u>PRI Training website</u> under "Custom Learning") at a company's facility or facilities. It is a truly flexible option that allows the opportunity to:

a) Schedule courses at your convenience
b) Reduce costs by saving money on travel expense and reducing time out of the office
c) Customize the course content to ensure programs are job-related and that new skills are immediately usable

Hosted Training: recommended for companies with a small number of individuals who require training when a public session is not convenient. Companies are offered the option of hosting



the training session at their company facility with enrolment open to other organizations. PRI Training markets and manages outside registrations and coordination of all details. As a benefit, the host company receives a limited number of free enrolments and reduced training fees.

Virtual and Webinar Training: recommended for companies who wish to provide training while limiting time out of the office. Delivered using interactive web technology, these live training sessions can be viewed from your desk. Convenient, PRI Training webinars save you the expense of travel and time away from the workplace by delivering training online. Companies also have the option of private virtual sessions.



Export Control – Supplier Resources

The Performance Review Institute and the Nadcap program are committed to complying with all governmental Export Control regulations. The International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR) are two important United States Export Control laws that affect the manufacturing, sales and distribution of technology. ITAR contains a United States Munitions List (USML) of restricted articles and services. EAR contains a Commerce Control List (CCL) of regulated commercial items, including those items that have both commercial and military applications. As Suppliers (and potential exporters), your responsibilities under these Export Control regulations can be broad, and often difficult to interpret. The following resources are available to assist you in educating yourself / your staff on Export Control rules:

• The Directorate of Defense Trade Controls (DDTC) is an arm of the US Department of State and has responsibility for the control of the export and import of defense articles and services. The DDTC website, outreach program including seminars, and compliance program guidelines can be found on the below websites.

www.pmddtc.state.gov/index.html

www.pmddtc.state.gov/outreach/documents/inhouse_seminars.pdf

www.pmddtc.state.gov/compliance/documents/compliance_programs.pdf

• The International Traffic in Arms Regulations ("ITAR," 22 CFR 120-130) is available on the following website.

http://www.pmddtc.state.gov/regulations_laws/itar.html

 The Bureau of Industry and Security (BIS) is the export regulations arm of the U.S. Department of Commerce and is responsible for implementing and enforcing the Export Administration Regulations (EAR), which regulate the export and re-export of most commercial items. The items regulated by BIS are often referred to as "dual-use" – items that have both commercial and military or proliferation applications – but purely commercial items without an obvious military use also are subject to the EAR. There are many training presentations and FAQ's available for download (free of charge) at the web addresses below:

http://www.bis.doc.gov/index.php/compliance-a-training/export-administration-regulationstraining/online-training-room

www.bis.doc.gov/exportlicensingqanda.htm

• The U.S. Commercial Service is the trade promotion arm of the U.S. Department of Commerce's International Trade Administration and helps U.S. companies get started in exporting to global markets. A representative from your local office is available to answer questions on Export Control and to provide additional resources (free of charge) on the topic:

www.trade.gov/cs/

Export Control

Export Control – Responsibilities

As Nadcap participants, it is critical that you ensure the appropriate handling of all Export Controlled materials within your facility at all times. Failure to do so could leave you and/or your organization vulnerable to criminal/administrative charges. The following safeguards have been built into the Nadcap audit process for your protection.

Before the Audit

During the audit scheduling process in eAuditNet, the Supplier will be asked:

For the commodity to be audited, is there any work performed at the audit site that is "restricted" under ITAR and/or EAR?

Important Definitions

EC Status – Restricted: Auditor barred from performing audits of work restricted by ITAR/EAR.

EC Status – Unrestricted: Auditor permitted full access to ITAR/EAR data; US Citizen or US Permanent Resident.

Exporter: Any individual or organization that sends materials, products, or information originating within the US to a recipient outside of the country.

The answer to this question is of critical importance, and will ensure an auditor with an appropriate Export Control status is sent to your site by PRI to conduct your Nadcap audit.

If you do not know the answer to this question at the time of scheduling your audit, please contact your customer.

It is the Supplier's responsibility to answer this question correctly. Should a restricted auditor arrive at a Supplier site to conduct an audit and there is only Export Controlled material available for the audit, rescheduling/penalty charges will be assessed by PRI to the Supplier.

If there is any doubt about the Export Control status of any part or process that is selected for a Nadcap Audit, contact the customer for verification of status.

During the Audit

Upon arrival at a Supplier facility, the auditor will advise you of their EC Status.

Confirm that the Auditor's EC Status is unrestricted if you have answered the ITAR/EAR question yes.

Your other responsibility during the audit is to maintain control of Export Control documents. This includes making sure the Auditor does not remove restricted technical data from the facility.



Export Control - Responsibilities (cont.)

After the Audit

Subscribers have access to all information (including corrective action responses and attachments) in the audit and are procedurally required to review all audits prior to issuance of accreditation. Many of these Subscribers are not authorized to access ITAR/ EAR restricted information.

Given the accessibility of eAuditNet to users across the world, under no circumstances is Export Controlled restricted technical data to be entered into eAuditNet or posted as objective evidence. Including this information in eAuditNet as part of your response or objective evidence is considered an unauthorized export of restricted technical data.

Submitting Objective Evidence

Do not attach objective evidence that includes restricted technical data to your response in eAuditNet.

Objective evidence that includes restricted technical data must be submitted to the following email address: <u>restricteddata@p-r-i.org</u>

Please contact your assigned audit report reviewer if you have any questions about submitting objective evidence.change.

The US Commercial Service is the government office to whom suppliers can reach out for support on all things related to Export Control. They welcome enquiries from all over the world. To find the contact information for your local office, please visit <u>http://export.gov/usoffices/index.asp</u>.

Don't forget to get involved!

There are many ways in which Suppliers can participate more actively in the Nadcap program and in particular the Nadcap meetings. The SSC Sub-teams offer a perfect opportunity to get involved. Sub-teams are created to meet a Supplier's needs: either by providing a service to assist Suppliers or by seeking to improve the Nadcap system for all. Ongoing SSC Sub-teams include:

- **The Supplier Helpdesk** a helpdesk at Nadcap meetings staffed by experienced Suppliers who answer any questions that attendees may have on the Nadcap meeting or Nadcap process.
- **Communications** a sub-team formed to provide timely and pertinent information to both new and seasoned Suppliers.
- **Mentoring** a free service which provides new Suppliers with the name and contact details of an experienced Supplier whom they can contact with queries on the Nadcap program.
- **The Supplier Survey** a biennial survey conducted to gain feedback on Suppliers' Nadcap experience, with a view to identifying opportunities for process improvement.

If you would like to become involved in the Supplier Support Committee or any of their initiatives, please contact <u>NadcapSSC@p-r-i.org</u>.

Getting Started

For most companies and individuals new to the Nadcap process, or who want to learn more about it, the Scheduling department is the first point of contact. The staff listed below can answer all your general questions and identify the right person for you to talk to when you have technical questions.



Jamie Ayres is a Sr. Scheduler at PRI International HQ in Pittsburgh, PA. Jamie is responsible for scheduling the FAI, HT, M&I, and NDT commodities in the Americas and European sectors.



Joyce Benkart is a Sr. Scheduling Coordinator at the PRI International HQ in Pittsburgh, PA and is responsible for scheduling audits for CT, MTL, and MMM commodities in the Americas and European sectors.



Lori McClain is the Auditing Scheduling Manager based at PRI International HQ in Pittsburgh, PA. Lori schedules audits for the COMP/NMMM/NMMT commodities in the Americas and European sectors and can provide assistance in all aspects regarding the Scheduling Dept.



Yvonne King is a Scheduler, based at the PRI International HQ in Pittsburgh, PA and is responsible for audit scheduling for CP, FLU, SEAL, SLTS as well as VVAs across all commodities in the Americas and European sectors.

Tips from Nadcap Audit Scheduling



The audit is a comprehensive assessment for compliance to customer requirements - make sure you understand your customers' expectations and ask questions if you are unsure.



Conduct a self-audit using the Nadcap audit checklists before scheduling the audit - this will help you work out how much you need to do before the auditor arrives.



Haruka Davenport is based at the PRI Japan office. She is the Manager of the Japan office and assists to schedule Japan audits across all Nadcap commodities.



Hailing Li is the Asia Scheduling Coordinator and is based at the PRI Asia office in Beijing, China. She is responsible for scheduling the Nadcap audits across all commodities in Australia and all Asian countries.



Marianna Rugo is based at the PRI Europe, Middle East and Africa office in London, UK. She is responsible for scheduling audits for the ASA, ETG, CMSP, NM/SE and WLD commodities in the Americas and European Sectors.



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