



PERRY JOHNSON REGISTRARS, INC.

AS9104 Updates – What You Need To Know?





AS9104/1 Major Changes

The first major alteration to AS9104/1 since 2012, AS9104/1A will primarily impact audit planning and duration for aerospace accreditation bodies, certification bodies, and their clients. The new revision was first published on January 7, 2022 with an 18-month training and transition period to follow. But what are the major impacts on aerospace suppliers?

The use of Campus, Several Site and Complex Structures has been removed. All organizations will either be designated as a Single Site or a Multi-Site. Your Certification Body will review your organization to make that determination and notification of the new designation will be sent.

All organizations AQMS standard(s) (i.e., 9100, 9110, or 9120) utilized for certification shall be selected based on the organization's scope of certification. Some organizations currently certified to one standard may be required to change or add additional standard(s). Again, your Certification Body will review your scope of certification and make a determination if a change or addition of standard(s) is needed, and notification will be sent. The below are the Intended Applications for each standard:

- **AS9100** – Organizations that design, develop, or provide aviation, space and defense products and services; and by organizations providing post-delivery activities, including the provision of maintenance, spare parts, or materials for their own products and services.
- **AS9110** – Organizations whose primary business is providing maintenance or continuing airworthiness management services for civil or military aviation articles and products and by OEMs with maintenance, repair and overhaul operations that are operated autonomously or that are substantially different from their production operations.
- **AS9120** – Organizations that procure parts, materials, and assemblies and resell these products to a customer in the aviation, space and defense industries.

Audit durations will see several changes dependent upon risk, performance, improvement, and other factors that may add or reduce audit time at each site. The below are some of the change's suppliers will see under the new AS9104/1A:

- Audit time can be reduced up to a **maximum** of 50%
 - This is exclusively done through Risk Analysis, Process Applicability Review, and Performance Based Surveillance/Recertification Process – see below.
- Audit planning/reporting will be included in audit duration calculations (minimum addition of 20% time)
- Up to 50% of an audit may be conducted remotely based on organizations capabilities
- The new Organization Certification Analysis Process (OCAP) will be utilized by Certification Bodies to help determine organizations audit duration and time

The changes to Audit Planning center primarily around the OCAP process and risk assessment, which takes into account:

- Complexity of Organization
- Internal Audit Program
- On-Time Delivery Goals and Actuals
- Conformity of Delivered Product or Service Goals and Actuals
- Customer Satisfaction Goals and Actuals
- Previous PEAR Performance



Based upon the outcome of the OCAP – rated as low, medium, or high risk – there may be 10% duration added, 10% duration reduced, or no change. It is also important for companies to note that if the information they provide to complete the OCAP is found to be inaccurate, a nonconformance will be issued.

As previously mentioned, another possible option for reducing audit time is utilizing a PBS/RP (Performance Based Surveillance/Recertification Process). This involves:

- Completion of one (3-year) AQMS cycle
- Annual OCAP performance results of low/medium for all sites
- Internal Audit Program in accordance with ISO 19011
 - Annual audit of all AQMS requirements
 - Defined, structured, multiple event audit program that adjust throughout the calendar year based upon:
 - Performance;
 - Customer Complaints;
 - Risk; and
 - Change Management
- Internal Auditor Competency that includes completion of a TPAB approved ASD Lead Auditor Course
- Ethics Policy that includes communication and reporting process
- No externally identified major nonconformity (e.g., CB, Customers, Regulatory Authorities) in the past 12 months related to Internal Audit, Management Review or Corrective Action Process
- 6 years without suspension
- Meeting customer satisfaction metrics based on customer provided data

What does the revision mean for virtual auditing?

According to 8.5.4.2 in AS9104/1A, a maximum of 50% of the audit duration may be conducted remotely if a physical site exists and ICT (Information & Communication Technology) is utilized. This will eliminate the possibility of any audits of physical locations being done 100% remotely after the transition to AS9104/1A is complete. It was a boon to the industry during the height of the COVID-19 pandemic to be able to access facilities remotely and reduce the risk of spreading the coronavirus through auditors coming to audit on-site, but under the new revision that will no longer be possible.

However, as further outlined in 8.5.4.3, if a physical site does not exist (such as a virtual site referenced in IAF MD 1) then ICT may be utilized for auditing in accordance with IAF MD 4. According to IAF MD 1, however, what qualifies as a “virtual site”? These are non-physical “locations” where a client organization performs work or provides services using an online environment. This typically allows individuals from different physical locations to execute processes. Several things to note, however:

- A virtual site cannot be considered as such where processes must be executed in a physical environment, such as warehousing, physical testing labs, installation or repairs.
- One example of a fully virtual site is an organization providing design & development services with all employees working remotely via a cloud-based environment rather than in a centralized office or design studio.
- For the purpose of calculating audit time, a virtual site is considered a single site.
- Further information and detail can be found in IAF MD 4: The use of information and communication technology (ICT) for auditing/assessment purposes.



While PJR was engaged in remote auditing between 2020-2022, we used ICT following the guidance of the IAF MD 4. The same was done for virtual sites, with a form completed in advance to ensure that the client organization had the capabilities and infrastructure (e.g. a stable and reliable internet connection) to enable the remote audit. If a remote audit was deemed possible, a live-stream audit was set up on the GoToMeeting platform (with allowances made if the client preferred a different service.) Throughout all remote audits, the duration would be calculated in the same way as for physical, onsite audits.

New Documentation Submission Requirements under AS9104/1A

According to 9.1.10 in AS9104/1A, AQMS-certified organizations must provide the data required by the standard to their CB before initial, surveillance, and recertification audits for OCAP completion (the purpose of which was discussed earlier in this piece). The requested documentation must be received by the certification body at least 90 days prior to the beginning of the audit, and while the audit itself may be scheduled prior to the request/receipt of the required information, the audit duration may change due to the contents of what is received. For PJR clients, your scheduler will send you the request for information roughly six months in advance of your audit; it cannot be submitted too far in advance of the scheduled date as the auditor must verify the information when on-site. Below is a list of the required documentation that must be submitted:

- Copy of Interaction of Processes
- Copy of Internal Audit Program/Procedure
- Copy of the latest internal audit reports and findings
- Copy of the latest Management Review information
- Copy of On-Time Delivery goals and actuals
- Copy of Conformity of Delivered Product or Service goals and actuals
- Customer Satisfaction goals and actuals
- Copy of Customer Complaints or Feedback
- Copy of product-related safety issues (if applicable)
- Confirmation of number of sites
- Confirmation of number of employees per site
- Confirmation of Scope of Certification
- List of additional aerospace standards utilized such as AS9146 (FOD Prevention Program) or AS9102 (Aerospace First Article Inspection Requirements)

If you have any questions about AS9104/1A or how it may affect your next audit, reach out to your scheduler! If you are not currently a PJR aerospace client and would like more information about PJR and our accredited third-party certification services, visit www.pjr.com or call (248) 358-3388 today!

