CONTROL OF ACCEPTANCE AUTHORITY MEDIA

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Control of Acceptance Authority Media

• The purpose of this overview is to provide awareness of Acceptance Authority Media (AAM) issues, discuss control criteria, and concerns raised by AAQG member companies and regulatory agencies.
Background

• Increasing oversight scope on the proper use of AAM performed by IAQG member companies on their suppliers and the supply chain.

• Regulatory Agencies attention to personal warranty and compliance to related regulations (Reference: 14 CFR 21.2)

• IAQG SCMH writing team is working on the development of Acceptance Authority Media guidance material.

• 9100D references to personal warranty and compliance (9100D section 8.6)
Background

AAM takes many forms in a Quality Management System (QMS) and is All-Inclusive of any media recognized by the QMS:

- Stamps both Electronic/Physical (including hybrid Biometrics/Fingerprint)
- Signatures or Initials
- Passwords
- ANY OTHER ACCEPTANCE AUTHORITY MEDIA RECOGNIZED BY THE QMS

Enforcement (US Attorney General for Criminal Offense)

- Violation of US Law for misrepresentation/declaration of Production Certificate product conformance of nonconforming product
- 9100 for control/use of AAM within the QMS (applies to all forms of AAM)

Application of AAM represents a **Personally Accountable Warranty** of completion to the applicable **Design Data, Build Records, & QMS**

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Terms and Definitions

• **Acceptance Authority Media:** The means defined by the organization to document the status of outputs with respect but not limited to conformity, configuration, monitoring and measurement requirements and identification throughout the product life cycle.

• **Stamp:** Identifying or characteristic mark or impression Physical device or artifact used to imprint or press an image. Stamps should be unique in shape for each specific activity and should have unique identification for each individual.

• **Electronic Signature:** Symbols or other data in digital form associated to a specific individual and attached to an electronically transmitted document as verification of that individual's completion of work.

• **Passwords:** Symbols or other data in digital form associated to a specific individual used to access an electronic system.
Federal Aviation Regulations (US Law)
Title 14 → Chapter I → Subchapter C → Part 21

• Subpart A—General
• §21.2 Falsification of applications, reports, or records.
  – (a) A Person may not make or cause to be made—
  – (1) Any fraudulent, intentionally false, or misleading statement on any application for a certificate or approval under this part;
  – (2) Any fraudulent, intentionally false, or misleading statement in any record or report that is kept, made, or used to show compliance with any requirement of this part;
  – (3) Any reproduction for a fraudulent purpose of any certificate or approval issued under this part.
  – (4) Any alteration of any certificate or approval issued under this part.
  – (b) The commission by any Person of an act prohibited under paragraph (a) of this section is a basis for—
  – (1) Denying issuance of any certificate or approval under this part; and
  – (2) Suspending or revoking any certificate or approval issued under this part and held by that Person.
9100D reference

8.5.2 Identification and Traceability

The organization shall use suitable means to identify outputs when it is necessary to ensure the conformity of products and services.

*The organization shall maintain the identification of the configuration of the products and services in order to identify any differences between the actual configuration and the required configuration.*

The organization shall identify the status of outputs with respect to monitoring and measurement requirements throughout production and service provision.

*When acceptance authority media are used (e.g., stamps, electronic signatures, passwords), the organization shall establish controls for the media.*

The organization shall control the unique identification of the outputs when traceability is a requirement, and shall retain the documented information necessary to enable traceability.
8.6 Release of Products and Services
The organization shall implement planned arrangements, at appropriate stages, to verify that the product and service requirements have been met.
The release of products and services to the customer shall not proceed until the planned arrangements have been satisfactorily completed, unless otherwise approved by a relevant authority and, as applicable, by the customer.

The organization shall retain documented information on the release of products and services. The documented information shall include:

- evidence of conformity with the acceptance criteria;
- traceability to the person(s) authorizing the release.

When required to demonstrate product qualification, the organization shall ensure that retained documented information provides evidence that the products and services meet the defined requirements.

The organization shall ensure that all documented information required to accompany the products and services are present at delivery.
9100D reference

8.1.2 Configuration Management

The organization shall plan, implement, and control a process for configuration management as appropriate to the organization and its products and services in order to ensure the identification and control of physical and functional attributes throughout the product lifecycle. This process shall:

a. control product identity and traceability to requirements, including the implementation of identified changes;

b. ensure that the documented information (e.g., requirements, design, verification, validation and acceptance documentation) is consistent with the actual attributes of the products and services.
Violations to AAM requirements

• In the course of Supplier Control Audits performed by regulatory authorities (FAA) and an IAQG member company, a number of findings were documented in which application of Acceptance Authority Media (AAM) was been utilized or underutilized in error.

• Misconception - AAM is often referred to as “Stamping”

• AAM takes many forms in a Quality Management System (QMS) and is All-Inclusive of any media recognized by the QMS;
  
  • Stamps both Electronic/Physical
  • (including hybrid Biometrics/Fingerprint)
  • Signatures or Initials
  • Passwords
  • ANY OTHER ACCEPTANCE AUTHORITY MEDIA RECOGNIZED BY THE QMS
Violations to AAM requirements

• “Stamping” violations (i.e. Improper Use of AAM) might include:

  • Errors (i.e. Omission, Typos, Legibility, Wrong Fields, etc.)

  • Untimely Use (i.e. Documentation is not completed as planned, “Stamp/Sign as you go”, etc.)

  • Misrepresentation (i.e. Uncertified/Unauthorized personnel, Falsification of documentation, Work not performed as planned, etc.)

  • Training Deficiencies (i.e. Ethics, Culture awareness, Proper Use of authority media, application of authority media is a personal warranty, etc.)
AAM Oversight activity

Contractual, Regulatory and 9100 AAM requirements

Quality Management System

Organization’s Leadership and Commitment for AAM

Employees’ performance

Audit / Oversight

Organization’s AAM Control Process (i.e. Database, Stamp Log)

Audit / Oversight

Organization’s Documented information related to AAM

Quality Management System

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Consequences of Non-Compliance

Consequences of non-compliance includes the following categories:

• Increased Costs / Loss of Production
• Quality Escape
• Product Liability / Warranty
• Loss of Employment
• Loss of Company Reputation / Customer
• Civil Fines and Penalties
• Regulatory Actions / Government Debarment
• Criminal Prosecution
• Personal Injury
• Loss of Life
Audit Expectations

• Interview with individuals applying AAM practices regarding their competence and awareness of the meaning of their acceptance (personal accountability).

• Audit completed work orders for AAM application errors (i.e. omissions, typos, legibility).

• Review in–process work orders to ensure that AAM application is accomplished in a timely manner (i.e. documentation is completed as planned, “stamp/sign as you go”).

• Assess retained documented information on work orders and training records to ensure that no AAM application misrepresentation occurs (i.e. uncertified personnel, falsification of documentation, work not performed as planned).

• Review training course material and records to ensure that AAM application training adequately communicates subjects such as ethics, culture awareness, and proper use of AAM.

• Validate that AAM requirements are communicated to sub-tier suppliers.
Summary

• The application of AAM to retained documented information is a “personal warranty” that a task was completed as scheduled (sequenced), as planned (documented), and when performed (timely)

• While it may not likely be the Root Cause of nonconformance and/or escapement, an AAM failure mode is in fact a Direct Cause of any nonconformance escapement

• At its most simplistic convention, if it had not been documented complete (or had been in the case of missing AAM) there would not have been a QMS escapement

• Proper use of AAM is not only important, it is critical
  – If you don’t know it is right do not use your AAM authority to indicate it is
  – If the documented information within the QMS does not account for “out of sequence” work do not skip planned operations
  – If the manufacturing plan calls out operations no longer performed or performed in a different manner get it revised
  – If the manufacturing plan calls out tooling/equipment not used get it revised

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Questions?
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