DAP Updates - Implementation Guide

June 1, 2021 | UL Data Acceptance Program

Guide Applies to Annually Assessed Laboratories

Welcome and Explanation

Thank you for partnering with UL as a Data Acceptance Program (DAP) participant laboratory.

New requirements have been added to the Data Acceptance Program (DAP) as a result of the United States Department of Labor publishing the updated OSHA Directive CPL-01-00-004.

The new requirements apply to all annually assessed Data Acceptance Program laboratories. The new requirements are highlighted in the updated DAP Applicable Requirements for Participants document.

The United States Department of Labor is requiring all Nationally Recognized Testing Laboratories (NRTLs) to comply with the requirements of the OSHA Directive CPL-01-00-004 no later than October 1, 2021. Some of these requirements extend to the annual assessment of DAP laboratories. Compliance will be confirmed for DAP laboratories during their next annual assessment.

This implementation guide will support our partner laboratories by providing step-by-step instructions on how to update management system documentation to comply with the requirements.

Table of Contents - Updated DAP Requirements

Introduction

What Has Changed with the UL Data Acceptance Program?

- UL has evaluated the updated OSHA Directive and made the necessary changes to our programs.
- Program and technical related guidance documents, available on the DAP Tools page of UL.com, have been updated to include the expanded requirements. Updates were made to the following documents:
  - DAP Applicable Requirements for Participants (00-OP-C0043)
  - Equipment Calibration Intervals and Verification Requirements (00-OP-C0045)
  - CTDP / TPTDP Authorized Signatory Responsibilities (00-OP-C0401)
- Ten requirements have been added to the annual DAP assessment to cover the updated OSHA Directive requirements.
- In this guide, each requirement has a dedicated page providing a recommendation for implementation and explaining how it will be assessed by the UL DAP auditors.

Documenting Requirements in Management System

- It is recommended that compliance with these updated OSHA Directive requirements be addressed separately from ISO/IEC 17025:2017 requirement clauses by writing them directly into laboratory management documentation. Referencing the OSHA Directive clause numbers and how the laboratory demonstrates compliance will result in a strong management system and simplify annual assessments.
- The OSHA Directive requirements are based upon ISO/IEC 17025:2005. These requirements, while similar to ISO/IEC 17025:2017, do not align directly. This makes it a challenge to organize the requirements within laboratory documentation. Guidance in this document will recommend where to locate these requirements in your documentation by referencing a similar current requirement.

Implementation Timeline

Here are the important dates relating to this program update. With the guidance in this document, support of our DAP team, and help of the DAP Lead Assessors, we believe all laboratories will be able to demonstrate compliance by the October 1st date.

June of 2020, DAP Lead Assessors began discussing the new OSHA Directive requirements with DAP participants during annual assessments.

June 1, 2021, Opportunity for Improvements (OFIs) can be issued by Lead Assessors when a laboratory cannot demonstrate compliance with the new requirements. This will create an implementation task for the new requirements.

October 1, 2021, Non-Conformances (NCRs) will be issued after this full implementation date to drive compliance in the following year's assessment.

Clause by Clause
Updated Requirements

Personnel Requirements

Technical Personnel Requirements

OSHA A-5.2A Technical Personnel Requirements
Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.2.1).

Technical personnel shall be:
i) permanent employees or employees, who through a written contract or agreement are within the management control. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see contract or agreement for specific employees.

ii) knowledgeable in appropriate evaluation, test procedures and test standards for the types of products covered by the laboratory's scope. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see records showing technical staff's knowledge of test procedures and standards within a participant laboratory's scope. A record may include past project work in testing, education, and/or formal training in testing, appropriate test standards, and relevant test procedures.

iii) knowledgeable in the risks and hazards associated with conducting safety testing, including laboratory safety regulations, safeguards and procedures to reduce laboratory risks. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see records showing Technical Staff's safety training.

Documenting Competence for Technical Personnel

OSHA A-5.2D Competency for Technical Personnel

Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.2.3).

The laboratory shall maintain records documenting competence in the particular testing, inspection, or other technical subjects, procedures, or practices that technical personnel will perform. For example, a record may include past project work in testing, education, and/or formal training in testing, appropriate test standards, and relevant test procedures. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see records showing technical staff's competence records documenting competence in the particular testing, procedures, or practices they will perform.

Technical Personnel Training Program Requirements

OSHA A-5.2C Training of Technical Personnel
Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.2.5).

The laboratory shall
i) maintain a written training program for new and current technical personnel, which shall include the proper procedures for applying new/updated test procedures and performing required tests. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see the formal training program, including one for new technical personnel.

ii) provide current technical personnel additional training, if necessary, when test standards or procedures are updated or developed or when responsibilities have changed. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see an example of training performed and logged due to an updated standard or test method.

iii) conduct training through appropriate training mechanisms, such as on-the-job training or formal classroom training. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request information on the types of training the laboratory uses. And proof of those types of training.

iv) maintain records of training for each individual who is a member of the technical staff. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see records for a specific staff member.

Equipment Requirements

Availability of Test Equipment

OSHA A-5.5A Availability of Test Equipment

Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.4.2).

The laboratory shall ensure that all equipment used for testing and evaluating products is available and in proper working order for NRTL work. However, equipment needed only occasionally for a special or unique type of product that is seldom tested, may be rented as needed. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see relevant test equipment records and confirm equipment is calibrated and in working condition. Ownership will be confirmed of regularly used equipment.

Equipment Calibration Prior to First Use

OSHA A-5.5B Equipment Calibration Prior to First Use

Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.4.4).

The laboratory must own, lease, or rent equipment and shall have procedures requiring that new, leased, rented, and repaired equipment is calibrated prior to first use. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and where applicable, request to see proof of equipment's calibration before first use.

Updating of Equipment Records

OSHA A-5.5C Updating of Equipment Records

Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.4.7).

The laboratory shall ensure that its procedures address adding, deleting, modifying or maintaining information in equipment records in an accurate and timely manner, and specify the personnel responsible for these tasks. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and identifies who is responsible updating the records. Assessor may also request to see recent activity related to updating the records.

Establishing Calibration Intervals

OSHA A-5.5D Establishing Calibration Intervals

Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.4.8).

The laboratory shall ensure that its procedures specify the steps for establishing calibration intervals for each type or item of equipment, and specify criteria, steps, and approvals for extending the calibration interval of an instrument. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see the calibration records of any relevant equipment that recently had their calibration interval set or changed.

Examining the Effects of Defective Equipment

OSHA A-5.5F Examining of the Effects of Defective Equipment
Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.4.9).

The laboratory shall have procedures to examine the effects of defective equipment on calibration and tests. The procedures shall identify the personnel responsible for such examinations, specify their responsibilities, and provide the steps for the examination including:

i) determining whether the effects are unacceptable (including the accept/reject criteria); UL DAP Assessor will confirm this requirement is written into the laboratory's processes, that examination procedures are in place, and that they identify the responsible personnel.
ii) identifying the products affected; UL DAP Assessor will confirm this requirement is written into the laboratory's processes, stating how affected products are identified.
iii) analyzing the particular tests impacted for these products; and UL DAP Assessor will confirm this requirement is written into the laboratory's processes for identifying which tests would be affected by the out of tolerance equipment.
iv) determining whether retesting is required UL DAP Assessor will confirm this requirement is written into the laboratory's processes and it specifies how to determine whether retesting would be required due to the specific out of tolerance issue.

Procedures shall also specify the report or document that is prepared for this examination, the notification provided to clients and certification body when retesting is required, and the steps to follow to perform the retesting. UL DAP Assessor will confirm this requirement is written into the laboratory's processes,

Trace-Back due to Defective Equipment

OSHA A-5.5G Trace-Back due to Defective Equipment
Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.4.9).

NOTE: This clause relates to testing that was performed with the defective equipment.

If a piece of test equipment is found to be out-of-tolerance, the laboratory shall have procedures to:

i) identify and document any product(s) tested by the out-of-tolerance equipment after the last known date the equipment was in-tolerance; UL DAP Assessor will confirm this requirement is written into the laboratory's processes and that a procedure is in place for logging affected product(s) tested.
ii) review and document any testing conducted using the out-of-tolerance equipment to determine if the out-of-tolerance condition impacted test results; UL DAP Assessor will confirm this requirement is written into the laboratory's processes and that it covers evaluation of whether the out-of-tolerance condition impacted test results, and if so, how trace-back occurs.
iii) retest the products impacted by the out-of-tolerance condition and document the results; and UL DAP Assessor will confirm this requirement is written into the laboratory's processes covering retesting of products when out-of-tolerance equipment may have impacted the results.
iv) document the corrective actions taken to comply with Section 5.5.G.i, ii, and iii, above, and retain such documentation in the test equipment records and the technical files or test records for any tested products impacted by the out-of-tolerance condition. UL DAP Assessor will confirm this requirement is written into the laboratory's processes to document the actions taken as part of this process and retain the documentation.

Verification of Non-Calibrated Equipment

OSHA A-5.5E Verification of Non-Calibrated Equipment

Laboratory management system documentation must include these requirements (similar to ISO/IEC 17025:2017 Clause 6.4.13).

Equipment that does not need to be calibrated must be verified against documented specifications and/or procedures. UL DAP Assessor will confirm this requirement is written into the laboratory's processes and request to see verification documentation for applicable equipment that does not require calibration.

We hope this guide has been helpful in explaining the new requirements and made it easier to bring your management system into compliance.

Thank you for being a valued partner in our Data Acceptance Program

Contact us at DAP@ul.com if you have any questions