

Recommended Solution for 2012 Issue titled: ***Standards - Strengthening Exam Security***

The Conference recommends approval of the following revisions to the *Standards for Accreditation of Food Protection Manager Certification Programs* to address examination security and increase the credibility of the Food Protection Manager Certification (using underline format for new language and strikethrough for deleted language).

All language has been extracted from the document titled: "Draft of Revised Standards 12 9 2011" attached to the Issue titled: "Report - FPMCC."

A. In the *Standards* Preamble, revise the "Modifications and Improvements" section as follows:

The FPMC Committee followed the Conference directive to use the 1996 conference working document, Standards for Training, Testing and *Certification* of Food Protection Managers, in the development of accreditation standards. Extensive revision of this document was presented to CFP's ~~2000, and 2002~~ 2012 Biennial Meeting of the Conferences for Food Protection under the title, Standards for *Accreditation* of Food Protection Manager *Certification* Programs.

The charge to the FPMC Committee from the 2010 Biennial Meeting of the Conference for Food Protection resulted in revisions to the *Standards* to enhance the integrity of the entire testing process, which includes identification and analysis of root causes of security violations and implement solutions.

The revision and reformatting of the document were made after a comprehensive FPMC Committee review of each section. ~~The~~ This revision of the *Standards for Accreditation* of Food Protection Manager *Certification* Programs:

- ~~1. adds and improves definitions that are more precise and more consistent with terminology and definitions used in the *psychometric* community and by accreditation organizations;~~
- ~~2. italicizes defined terms throughout the document;~~
- ~~3. eliminates ambiguities in the 1996 conference working document pertaining to test development and administration;~~
- ~~4. identifies *certification organization* responsibilities to candidates, the public and the *accrediting organization*;~~
- ~~5. adds computer based test standards; and~~
- ~~6. clarifies demonstration of *continued proficiency*;~~
2. modifies or creates *Standards* to better address professional credibility and training of test administrators/proctors; handling of examination packages; shipping irregularities; location (site) irregularities; and breach of the certification organization's test administrators/proctors protocols and requirements;
3. uses "*test administrator/proctor*" in the *Standards* to indicate duties for both "*test administrator*" and "*proctor*;" and

4. adds a standard for management systems.

B. In the *Standards* “Section 1.0 – Definitions” – add the following definitions:

1.18 Examination Booklet means the paper version of the *food safety certification examination*.

1.22 Exposure Plan means the policies and procedures in place to ensure that examination items are not exposed to examinees or other people that may result in an examination item being memorized and/or shared.-

1.26 Item means an examination question.

C. In the *Standards* “Section 4.0 – Food Safety Certification Examination Development” – revise Subsections 4.1 and 4.17 and move the components of 4.18 to Section 5.

4.1 ~~Food safety certification examinations administered by accredited certifying programs must~~ certification organizations shall comply fully with all criteria set by the CFP and ~~must shall~~ meet explicit and implicit standards to protect the public from foodborne illness. The accredited certification organization shall provide a food safety certification examination that:

- A. conforms to all CFP Standards for Accreditation of Food Protection Manager Certification Programs;
- B. has been developed from an item bank of at least 1000 questions; and
- C. on a quarterly basis, is provided in at least two new examination forms in the English language.

4.17 Specific Procedures Requirements for Examination Standardization.

Administration. ~~Certification organizations must shall~~ specify conditions and procedures for administering all *food safety certification examinations* in a standard manner ~~in order to assure ensure~~ that all candidates ~~examinees~~ are provided with the opportunity to perform according to their level of ~~competency ability~~ and to assure ~~ensure~~ comparability of scores. Examination Booklets shall be of high quality printing to ensure ease of reading. ~~Procedures must include, but not be limited to:~~

- a. ~~requirements for qualifications of test administrators and proctors and a suitable training program for each;~~
- b. ~~a complete administration manual describing each step of the test administration process and the rationale for each;~~
- c. ~~clear instructions for candidates both printed for distribution to candidates and read by the test administrator;~~
- d. ~~high quality printing of examination booklets to assure ease of reading;~~
- e. ~~specification of security procedures to assure lack of exposure of test items to unauthorized persons during testing and to prevent theft of examination items or booklets;~~
- f. ~~clear criteria (with rationale) for physical facilities for examination administration;~~
- g. ~~clear criteria (with rationale) and procedures for adaptations necessary to accommodate qualified candidates with disabilities, and~~

- h. clear criteria (with rationale) and procedures for adaptations necessary to accommodate qualified candidates with literacy limitations that may require a reader.

~~4.18~~ A *certification organization* must have a published, written policy regarding test-site interpretation of *food safety certification exams*. If a *certification organization* chooses to allow test-site interpretation of food safety exams when an exam is not available in the candidates' native language, the *certification organization* must have a published, formal application process available to all candidates. Procedures must include but not be limited to:

- a. an application process for candidates that includes an evaluation and documentation component to determine the eligibility of the candidate for test-site interpretation;
- a. an application process for interpreters that includes clear and precise qualifications that must include but not be limited to the following:
 - i. fluent in both languages;
 - ii. have a recognized skill in interpretation;
 - iii. trained in the principles of objective test administration;
 - iv. have no personal relationship with the candidate (may not be another candidate, may not be a relative or friend of the candidate and may not be a co-worker, employer, or an employee of the candidate);
 - v. may not be a *Certified Food Protection Manager* nor have any vested interest in Food Protection Manager certification or conflict of interest;
 - vi. provide references or other proof attesting to the interpreter's competencies and professional acumen; and
 - vii. agree in writing to maintain the security of the examination.
- b. must be in a proctored environment where the interpreter and candidate are not a distraction to other candidates; and
- c. must be in a proctored environment where the interpreter is not active as the *test administrator* or *proctor*.

D. In the *Standards* "Section 5.0 – Food Safety Certification Examination Administration" – reorganize, revise, replace, and add subsections as follows:

5.0 *Food Safety Certification Examination Administration.* All sections of this Standard apply to Computer Based Technology (CBT) Administration except Section 5.1.

~~**5.12 5.1 Security for Examination Booklets. Packing, Shipping, and Storage of Examination Materials.**~~

~~Security of the *food safety certification examination* materials must be maintained in shipments to and from the examination administration site, and must include but not necessarily be limited, and are subject to the following requirements:~~

- a. ~~secure, tamper-resistant packing is required for all materials in all phases of shipment; packing system must be designed to reveal any tampering or violation of the package's security;~~

A. Securing examination booklets

1) Each individual *examination booklet* shall be secured in by using one of the following methods both prior to and after administration:

- a. enclosing in a sealed tamper-resistant package;
- b. shrink-wrapping;

- c. sealing on all three open sides with each seal of sufficient size to cover at least one square inch of the front side and to overlap and cover the same amount of space on the back side of the examination booklet; or
- d. using any other technology that ensures that only the examinee can view the contents of the examination booklet.

2) Only the examinee is allowed to break open the examination booklet the packaging or seals.

B. Packaging by certification organization

- 1) Each individual examination booklet shall be securely sealed before packing.
- 2) Secure tamper-resistant shipping material, such as Tyvek envelopes or similar materials that are designed to reveal any tampering or violation of the package's security, is required for all shipment of materials in all phases.
- 3) Packaging must include a packing list that contains:
 - a. examination form language(s) or version(s) enclosed; and
 - b. quantity of examinations enclosed.

~~b. shipping must be done by certifiable, traceable means so that its location can be determined at any given time; and~~

C. Shipping to the test administrator/proctor from the certification organization

- 1) Shipping shall be done by certifiable, traceable means, with tracking numbers so that the location can be determined at any given time.
- 2) A signature is required upon delivery.
- 3) Only an individual authorized by the test administrator/proctor may sign for the package.

~~c. the packing list must show the number of packages in the shipment and the exact contents of each.~~

D. Storage by test administrator/proctor

~~The package(s) of examination booklets must shall be placed in secure storage secured at all times immediately upon delivery. They must be kept in secure storage both before and after they are used. Under no circumstances may examination booklets, examinee used answer sheets, or other examination materials be kept where other employees or the public has access.~~

E. Shipping back to the certification organization from the test administrator/proctor

- 1) After examination administration, examination booklets and answer sheets shall remain in secure storage until returned to certification organization.
- 2) The following shall be in tamper-resistant shipping material:
 - a. all used and unused examination booklets for each examination administration;
 - b. examinees' used answer sheets; and
 - c. all required certification organization forms.
- 3) Shipping shall be done within two business days following the examination date by certifiable, traceable means, with tracking numbers so that the location can be determined at any given time.

F. Handling unused examination booklets that have been held for up to ninety days. The test administrator/proctor will:

- 1) assure ensure that all examination booklets are accounted for;
- 2) package examination booklets securely as described above; and

- 3) ship to the certification organization securely packaged and according to these Standards and the Certification Organization's instructions.

5.16 5.2 Test Site Requirements.

Sites chosen for administering *food safety certification examinations* ~~must~~ shall conform to all legal requirements for safety, health, and accessibility for all qualified candidates examinees.

A. Additionally, the accommodations, lighting, space, comfort, and work space for taking the examination ~~must shall~~ reasonably allow all candidates-examinees to perform at their highest level of ~~competency of ability~~.

5.17 B. Requirements at each test site include, but are not limited to:

- 1) a. accessibility in accordance with the requirements of the Americans with Disabilities Act, ~~must shall~~ be reasonably available for all qualified examinees, whether the exam examination administration occurs at the main examination location site, or at an alternative examination location site that meets the same location requirements as the main examination location site;
- 2) ~~b.all sites must conform~~ conformity to all fire safety and occupancy requirements of the jurisdiction in which they are located;
- 3) ~~e.there must be sufficient spacing between each examinee in the area in which the actual testing examination~~ is conducted, or other appropriate and effective methods, to preclude any examinee from viewing another examinee's test examination;
- 4) ~~d. acoustics must allow~~ allowing each examinee to hear instructions clearly, using an electronic audio system if necessary;
- 5) ~~e.lighting at each examinee's work space be adequate for reading fine print; and~~
- 6) ~~f.ventilation and temperature must be appropriate for generally recognized health and comfort of examinees;~~
- 7) use of private room(s) where only examination personnel and examinees are allowed access during the examination administration; and
- 8) no further admittance into the test site once examination administration has begun.

4.18 5.3A *certification organization* ~~must shall~~ have a published, written policy regarding test-site interpretation language translation of food safety certification exams-examinations. If a *certification organization* ~~chooses to allow~~ allows test-site interpretation language translation of a *food safety certification exams-examination* when an exam examination version is not available in the candidates' native examinees' requested language, the *certification organization* ~~must shall~~ have a published, formal application process available to all candidates potential examinees. Procedures ~~must shall~~ include but not be limited to:

- a. A. An application process for candidates potential examinees that includes an evaluation and documentation component to determine the eligibility of the candidate potential examinee for test-site interpretation language translation,
- b. B. An application process for interpreters that includes clear and precise qualifications that ~~must shall~~ include but not be limited to the following:
 - i. 1) being fluent in both languages;

- ii- 2) have a recognized skill in interpretation language translation;
 - iii- 3) trained in the principles of objective test examination administration;
 - iv- 4) have no personal relationship with the candidate examinee (may not be another candidate examinee, may not be a relative or friend of the candidate examinee and may not be a co-worker, employer, or an employee of the candidate examinee);
 - v- 5) may not be being a *Certified Food Protection Manager* nor having any vested interest in Food Protection Manager certification or conflict of interest;
 - vi- 6) provide references or other proof attesting to the interpreter's- translator's competencies and professional acumen; and
 - vii- 7) agree in writing to maintain the security of the examination.
- e. C. ~~must be in a~~ A proctored environment where the interpreter translator and candidate examinee are not a distraction to other candidates examinees, and
- d. D. ~~must be in a~~ A proctored environment where the interpreter translator is not active as the *test administrator* or proctor.

5.19 5.4 Scoring and Reporting Requirements. ~~Completed answer sheets and test booklets (used and unused) must be shipped by the *test administrator* according to the *certification organization's* written security procedures.~~

5.20 ~~Scoring will be done only by means authorized by the certification organization and approved by the accrediting organization.~~

A. Only the *certification organization* may score the examination by methods approved by the accrediting organization. No official scoring is to be done at the test site.

5.24 B. *Food safety certification examination* scores will not be released and as being official until verified and approved by the *certification organization*.

5.22 C. Examinee scores will be confidential, available only to the examinee and to persons or organizations approved in writing by the examinee.

5.23 D. Score reports will be available to examinees in a time frame specified in the application, which will not be later than exceed fifteen business days following the administration of the *food safety certification examination*. If there is a delay due to problems in verification or authentication of scores, examinees will be informed and an approximate date for release of the scores will be announced. The *certification organization* will have ongoing communication with examinees and with the *test administrator/proctor* until the scores are verified and released.

5.5 **Test Administrator/Proctor(s) Role.** Test administrators/proctors shall have successfully completed the *certification organization's* specific training in examination administration and security procedures. They shall provide written assurance of maintaining confidentiality of examination contents, of adhering to the *certification organization's* standards and ethics of secure examination administration, and of agreeing to abide by the *certification organization's* policies, procedures, and rules.

~~5.6~~ — The *certification organization* shall ensure that all *test administrators* and *proctors* meet the competency requirements established by the *certification organization*, and comply with all requirements of the *certification organization*.

5.6 ***Test Administrator/Proctor Requirements.*** To serve as a *test administrator/proctor* for an accredited *certification organization* the qualified individual shall complete the *certification organization's*:

A. signed Application;

B. non-Disclosure Agreement (NDA);

C. training program for *test administrators/proctors*; and

D. conflict of Interest Disclosure Agreement (can be a part of the NDA).

5.7 ***Test Administrator/Proctor Renewal.*** *Test administrators/proctors* shall renew the training program for *test administrators/proctors* and Non-Disclosure Agreement with the *certification organization* every three (3) years.

5.3 5.8 Instructor/Educator/Trainer as Test Administrator/Proctor. When an instructor/educator /trainer of food safety training administers, proctors or monitors a food safety certification examination from an accredited certification program, the *accredited certification organization* shall provide a food safety certification examination that:

_____ a. _____ conforms to all CFP standards,

_____ b. _____ has been developed from an item bank of at least 600 questions, and

_____ c. _____ minimally on a quarterly basis, is based on a new *examination form*.

The certifying organization must have a plan that demonstrates it has controlled for item and examination exposure. The exposure plan must take into account the number of times a test item and form/version is administered.

When a person acts as a *trainer* and a *test administrator/proctor*, that person relinquishes the role of *trainer* when acting in the role of *test administrator/proctor* and acts solely as a representative agent of the *certification organization*.

5.9 ***Test Administrator/Proctor Responsibilities.***

A. **~~5.18 Examination Scheduling.~~** Schedule examinations. *Food safety certification examinations* must shall be scheduled far enough in advance to allow for timely shipment of supplies or pre-registration for computer-based examinations.

B. Ensure no destruction of *examination booklet* materials or computer equipment; _____

~~c. Comply with the *certification organization's* procedures for handling any breaches of exam security that may occur according to the *certification organization's* policies and rules.~~

C. At all times:

1) handle examination materials securely;

2) ensure test site conformity;

3) space examinees per protocol;

4) ensure examinees' rights;

5) ensure confidentiality of examinees' personal information;

- 6) ensure standardized procedures are followed:
- D. Before the examination:
 - 1) check examinees' identification;
 - 2) check for and exclude unauthorized objects;
 - 3) distribute examination materials;
 - 4) read instructions to examinees verbatim;
 - 5) ensure examinees complete information section of answer sheet or online registration form.
- E. During the examination:
 - 1) supervise proctors;
 - 2) monitor examinees during examination;
 - 3) identify and document cheating incidents;
 - 4) check for and exclude unauthorized objects;
 - 6) identify and document environmental distractions.
- F. After the examination
 - 1) collect and return examination booklets and answer sheets to *certification organization* or close computer based testing session;
 - 2) report possible security breaches and examination administration irregularities in compliance with the *certification organization's* policies.

~~5.13~~—~~Test administrators~~ are responsible for the organization and administration of all examination site activities and procedures, and for the accurate identification of each examinee. They are also responsible for supervision of the activities of ~~proctors~~. When the ~~instructor/educator/trainer~~ also serves in the role of ~~test administrator~~, it is important that the individual clearly recognizes the difference in those two roles.

~~5.14~~ ~~Proctors~~ shall work under the direction of the ~~test administrator~~. They have the responsibility and must have the ability to observe examinee behaviors, accurately distribute and collect test materials, and assist the ~~test administrator~~ as assigned.

~~5.15~~ ~~5.10~~ The number of approved ~~proctors~~ assigned to a ~~test administrator~~ must ~~shall~~ be sufficient to allow each examinee to be observed and supervised to ~~ensure~~ ensure conformance to security requirements. There shall be no less than one ~~test administrator/proctor~~ for the first thirty-five examinees, plus one additional ~~test administrator~~ or ~~proctor~~ for each additional 35 examinees or fraction thereof.

5.11 Examination Security

~~5.1~~ **A.** All aspects of ~~food safety certification examination~~ administration are to be conducted in a manner that maximizes the security of the examinations, in keeping with the public protection mandate of the CFP. This ~~must~~ ~~shall~~ be accomplished in a manner that ensures fairness to all ~~candidates~~ examinees.

~~5.2~~ **B.** All examinees shall begin taking the examination at the same time. No examinee shall be admitted into the test site once examination administration has begun.

~~**Security of Food Safety Certification Examination Contents.**~~ ~~Food safety certification examinations~~ must ~~shall~~ be presented in a manner that allows absolutely no one other than the examinees to see the contents of the booklet or alternative medium, both before, ~~during~~, and after the examination is administered. ~~Only the examinee is allowed to break open the examination package or seals.~~

5.9 ~~C.~~ Where special legitimate accommodations must shall be made for otherwise qualified candidates examinees under provisions of the Americans with Disabilities Act, arrangements must care shall be taken to ensure that security of the examination is maintained. Arrangements shall be such that the *food safety certification examination* contents are not revealed to any test administration personnel with any conflict of interest. A written affirmation to that effect and a written nondisclosure statement from the individual who was chosen to assist the otherwise qualified candidate must examinee shall be provided to the *certification organization*.

~~5.10~~ **5.12** The *certification organization* must shall provide procedures to be followed in any instance where the security of a *food safety certification examination* is, or is suspected to be, breached.

A. Included must shall be specific procedures for handling and for reporting to the *accrediting certification organization*, any suspected or alleged:

- 1) cheating incidents;
- 2) lost or stolen booklets examination materials;
- 3) intentional or unintentional divulging of test examination items by examinees or test examination administration personnel; or
- 4) any other incidents perceived to have damaged the security of the examination or any of its individual items.

B. Corrective actions to guard against future security breaches must shall be established and implemented.

C. Documentation of corrective actions and their effectiveness must shall be made available to the accreditation body *accrediting organization*.

5.8 **5.13 Item & Examination Exposure.** ~~The certification organization must demonstrate it has controlled for item and examination exposure. An exposure plan must take into account the number of times a test item and examination form/version is administered, that no examination form is retained for any test administration or by any test administrator/proctor for more than 90 days; and that at all times it can account for all copies of all used and unused examination forms before being returned to the certification organization.~~
The certification organization shall have an exposure plan that:

- A. controls for item and examination exposure;
- B. accounts for the number of times an examination item, examination form, and examination version is administered;
- C. ensures that no examination form is retained by any examination administration personnel for more than 90 days;
- D. at all times accounts for all copies of all used and unused examination booklets; and
- E. systematically and actively demonstrates that every used answer sheet, examination booklet, and any other examination materials and answer keys are accounted for to prevent, reduce, or eliminate examination exposure.

5.4 ~~**Test Administrator/Proctor Qualifications, Training and Duties.**~~
5.14 **Certification Organization's Responsibility to Test Administrators/Proctors.**

A. The *certification organizations* must shall specify the responsibilities of test administrators and of proctors *test administrator/proctor*, set minimum criteria for approval of *test administrators* and for *proctors*, and provide suitable programs of a training program to enable persons applicants to meet these the approval criteria. Responsibilities, duties, qualifications and training of *test administrators* and *proctors* must shall be directed toward assuring standardized, secure

examination administration and fair and equitable treatment of examinees. Policies and procedures for taking corrective action(s) when any *test administrator* or *proctor* fails to meet job responsibilities must be implemented and documented.

5.5 B. The *certification organization* shall define and provide descriptions for the roles of *test administrators*; */proctors*, and *certification organization* personnel that will clearly delineate clearly indicating the responsibilities of each for these roles. The *certification organization* shall demonstrate how it ensures that all certification personnel, including as well as test administrators and /proctors, understand and practice the procedures identified for their roles.

C. Test administrator/proctor training programs shall include:

- 1) specific learning objectives for all of the activities of test administrator/proctor; and
- 2) an assessment component that shall be passed before an examinee for test administrator/proctor will be approved.

5.7 5.15 Test Administrator/Proctor Agreements. The *certification organization* shall enter into a formal agreement with the *test administrator/proctor* and shall assess and monitor the performance of *test administrators* and *proctors* in accordance with all documented procedures and agreements. The formal agreement shall at a minimum include, address:

- A. provisions that relate to code of conduct;
- B. conflicts of interest; and
- C. a statement of consequences for breach of the agreement.

5.16 The *certification organization* shall assess and monitor the performance of test administrators/proctors in accordance with all documented procedures and agreements.

5.17 The *certification organizations* is not permitted to hire, contract with, or use the services of any person or organization that claims directly or indirectly to guarantee passing any certification examination. Trainers making such a claim, whether as an independent or as an employee of another organization making the claim, are not eligible to serve as test administrators/proctors for any certification organization.

5.18 Policies and procedures for taking corrective action(s) when any test administrator or proctor fails to meet job responsibilities shall be implemented and documented. Test administrators/proctors that have been dismissed by the certification organization for infraction of policies or rules, incompetence, ethical breaches, or compromise of examination security will be reported to the accrediting organization.

5.19 The *certification organization* shall provide documentation that verifies compliance with the 1:35 ratio (test administrator/proctor: examinees).

5.14 5.20 Examination Administration Manual.

The *certification organization* must shall provide each test administrator/proctor with a manual detailing the requirements for all aspects of the food safety certification examination administration process. The Examination Administration Manual shall include a standardized script for the paper examination test

administrator/proctor to read to examinees before the examination commences. For computer based tests (CBT), standardized instructions shall be available for examinees to read.

5.21 Examination Scripts. Separate scripts/instructions may be created for different delivery channels or certification organizations. Certification organizations may customize elements of the scripts to fit their particular processes, but each script shall contain the following:

A. Introduction to the Examination Process

- 1) composition of the examination (number of questions, multiple choice, etc.);
- 2) time available to complete the examination;
- 3) role of the test administrator/proctor;
- 4) process for restroom breaks; and
- 5) process for responding to examinee comments and questions.

B. Copyright and Legal Responsibilities

- 1) description of what constitutes cheating on the examination;
- 2) penalties for cheating; and
- 3) penalties for copyright violations.

C. Examination Process

- 1) maintaining test site security;
- 2) description of examination components unique to the certification organization (examination booklet, answer sheet completion, computer process in testing centers, etc.);
- 3) instructions for proper completion of personal information on answer sheets/online registration and examination booklets;
- 4) instructions on properly recording answers on answer sheets or online; and
- 5) instructions on post-examination administration process.

E. In the *Standards* “Section 7.0 - Certification Organization Responsibilities to Candidates and to the Public” – replace sections 7.3 and 7.4 with one new section as follows:

~~**7.3 — Effective Date of Certificate** Certificates issued and electronic listing of certificate holders maintained by accredited certification programs shall identify the food safety certification examination form recognized by the accrediting organization and specify the date the examination was taken.~~

7.3 Individual Certification Certificates:

A. Each certification organization will maintain a secure system with appropriate backup or redundancy to provide verification of current validity of individual certification certificates.

B. Certificates shall include, at a minimum:

- 1) issue date/date examination was taken;
- 2) length of time of certification validity;
- 3) name and certification mark of certification organization;
- 4) ANSI accreditation mark;
- 5) name of certified individual;
- 6) unique certificate number;
- 7) name of certification;
- 8) contact information for the certification organization; and

9) examination form identifier

C. Replacement or duplicate *certificates* issued through an *accredited certification organization* shall carry the same issue date, or date of examination, as the original *certificate*, and will be documented by the *certification organization*.

~~7.4 — **Replacement or Duplicate Certificate.** Replacement or duplicate *certificates* issued through an *accredited certification program* shall carry the same effective date as the original, with an expiration worded in such a manner that indicates the *certification* will be valid for no more than five years.~~

F. And add a new “section 9.0 – Management Systems” as follows:

9.0 Each certification organization shall have a formal management system in place to facilitate continuous quality improvement and produce preventive and corrective actions.

9.1. The management system shall contain the following three components.

A. Document control to include:

- 1) lists of all documents pertaining to the certification organization;
- 2) dates for documents approved for implementation by the certification organization;
- 3) the person(s) within the certification organization responsible for the documents; and
- 4) listing of individuals who have access to the documents.

B. Internal audits to include:

- 1) identification of critical activities;
- 2) data collection process and evaluation schedule;
- 3) audit methodology and evaluation process;
- 4) the person(s) authorized to perform audits; and
- 5) report audit findings and identify corrective action required.

C. A Management Review that includes:

- 1) a documented annual review of internal audit results;
- 2) a management group that conducts the review;
- 3) a review of the audit results to determine corrective actions needed;
- 4) a review of the audit results to determine preventive actions needed; and
- 5) the effectiveness of corrective and preventive actions taken.