

Accountability and AISC Certification

BY KIMBERLY A. SWISS

Ensuring that facilities are properly using the quality plans they have in place is key to making the system work.

ACCOUNTABILITY IS A HOT TOPIC with fabricators, designers, erectors, and owners. This month AISC Certification addresses some of the more common questions regarding this subject, including going right to the top of AISC for some clear answers.

One question AISC Certification frequently receives is what we mean by accountability, often followed by questions regarding how the program provides accountability of our certified facilities.

The first thing that we point to is the annual audit conducted by Quality Management Company (QMC), the independent auditing company responsible for verifying that a fabricator or erector's facility is adhering to the procedures put forth within its quality management system (QMS). This audit can last either one or two days depending on where a certified facility is in the audit cycle.

The initial audit takes two full days in order to review all of the required procedures according to the specific quality program. The following year the audit will be one day where the program's core values and additional program elements are examined. The year after that the core values are again revisited along with other specific elements, after which the cycle begins again with a full, two-day audit.

In addition to those audits, each facility is required to do an internal audit each year. Section 19 of the *Certification Standard for Steel Building Structures* states: "The Fabricator shall perform an internal audit of each Element of the Quality Management System at least once a year to evaluate their compliance and the effectiveness of implementation. The Management Representative or a qualified individual, independent of the function being audited, shall perform the audit and provide a written record of the audit result from each Element."

What is the audit cycle?	
2010	2-day initial audit – entire Standard
2011	1-day audit
2012	1-day audit
2013	2-day full audit – entire Standard

This example shows the annual audit schedule for a facility that begins the certification cycle in 2010.

Each facility can use this requirement to find and fix any discrepancies in its QMS. More importantly, the internal audit demonstrates that its QMS is maintained and followed throughout the year.

Besides these yearly audits, other procedures are in place to highlight accountability of AISC Certification. The table on page 71 highlights four of these: Fraudulent Activity, an Allegation Guideline, a Complaint Procedure, and an Appeal Procedure. I sat down with Roger Ferch, president of AISC, to discuss these four items in detail and the importance that AISC leadership places toward our certification objectives.

AISC Certification: Why is AISC discussing and clarifying these items in the Quality Corner?

Ferch: The simplest point is that each of these reinforces the integrity of the AISC Certification program. There are procedures in place to define and promote accountability of our program. In addition, it will help shed light in the design community and construction industry, that our program has a way to address any discrepancies of quality in our program. If they happen to have an unsatisfactory experience, then we want to hear about it, so that we are able to address it with the certified facility. Maintaining the integrity of the AISC Certification program is of the utmost importance to the Institute.

AISC Certification: What does this provide to the end users—the owner, general contractor, engineer and architect?

Ferch: This group of individuals uses AISC Certification as a resource to help define quality in terms of fabrication

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Quality Corner is a monthly feature that covers topics ranging from how to specify a certified company to how long it takes to become a certified company. If you are interested in browsing our electronic archive, please visit www.aisc.org/QualityCorner.

and erection services, and these procedures provide recourse to this group that is easily defined and in place. The last thing that we want, as an association, is to be certifying facilities that do not meet the needs of the industry and requirements of our program. We want this group to know there are consequences for non-conformance issues.

AISC Certification: Would you please elaborate on these procedures?

Ferch: The Fraudulent Activity Procedure is pretty self-explanatory and usually involves a non-certified facility passing itself off as certified by using our logo in documents or on its website. After we contact them, they usually rectify the situation quickly and remove the claim.

The Allegation Guideline and the Complaint Procedure allow the specifiers, owners, and even our certified facilities (who subcontract work to other certified facilities) the opportunity to involve AISC if there is a lack of quality in the project due to the quality management system. If there is a breakdown in the system, we need to address it, because that can result in a negative perception of our program. As I mentioned before, it gives us feedback about our certified facilities and the chance to improve the ones not performing to our minimum standards and/or remove them from the program if they have indeed slipped through. The Complaint Procedure is limited to parties involved in a project's contract and has a very formal process. The Allegation Guideline is open to everyone and follows a less formal approach to resolution.

Finally, the Appeal Procedure allows our certified facility or applicant to dispute an auditing finding or result—and allows some checks and balances in our internal processes. This seems to have declined over the years due to our improved QMC auditor training and education. We have seen a significant improvement in terms of our auditor consistency, and the feedback from our certified facilities has been extremely positive.

AISC Certification: What are the differences between the allegation and complaint procedures?

Ferch: The Complaint Procedure tends to be more labor intensive and requires a longer time period with its process, since it involves more individuals outside of AISC

Certification. The complaint is reviewed by a five-member Complaint Review Task Group and recommended action is reviewed by the AISC Certification Committee.

The benefit to both of these procedures is to address any alleged non-conformance issues that arise at a certified facility that could lead to quality issues in terms of fabrication or erection. It allows the project design team or general contactor a voice to AISC and help get us involved on a project-by-project, facility-by-facility basis. If the quality management system and the other requirements in our programs are being followed, then the facility should never have to worry about either procedure—there should be processes in place to identify and resolve quality issues.

AISC Certification: When have you seen these procedures used in the marketplace?

Ferch: The first procedure, Fraudulent Activity, has been used several times, but never to the point of having to involve AISC General Counsel. The second procedure, Allegation Guideline has been used by AISC staff whenever an allegation has been raised, but its use has not been publicized to the general public. It is sometimes difficult to ascertain if a complaint or allegation is valid or if the parties involved are just angry with each other or involved in a contract dispute. I wanted to bring all of our procedures to the marketplace to reaffirm our commitment to upholding the excellence of our program.

AISC Certification: What else is AISC doing?

Ferch: Our existing procedures have been in place for quite some time. During the past year we have had occasion to use each of them and are now looking at the results to see how to improve the quality and public perception of our certification programs. One concept being seriously considered is the addition of verification audits to the program.

A facility will fall into this program by a variety of ways, such as: having an allegation or complaint filed against them, an excessive number of corrective action requests (CARs), a repeat of a specific CAR or concern two years in a row, or by the recommendation of the QMC auditor. These items will flag a facility to be included into a group that will be targeted for an additional audit, or “Veri-

fication Audit,” which will be in addition to their regularly scheduled audit for the given audit cycle. The facility would receive only 48 hours advance notice before the QMC auditor arrives for this additional audit.

The importance of this is that it provides a means to identify and take corrective action with facilities that may not be meeting the AISC Certification requirements. So if you're meeting all of our requirements and performing well on your audits and not receiving negative feedback from the industry, then you won't be flagged. It's as simple as that.

I am very excited about continuing to work with our certified companies, the specifiers, and the owners to improve our certification program. We must all work together to identify and address any weaknesses, perceived or real. It is our plan to have a draft of the program changes to roll out at the upcoming NASCC in Orlando and to solicit user feedback.

AISC Certification: What does all this mean to AISC Certification?

Ferch: It means that AISC Certification is publicizing why its program has consequences for non-conformance and that it will continue to strengthen our certified facilities through increased accountability in the marketplace. We are promoting these existing procedures, and working to improve them, in order to answer what the industry has requested of our certification program.

I am looking forward to working with the certification department to evolve this program and make it even more successful and respected. Our participants understand the improved quality that we bring them through improved quality process and communication, and we will continue to promote this advantage to the industry. MSC

To see these procedures in their entirety, please visit www.aisc.org/certification and click on Contact and Feedback.

	Fraudulent Activity	Allegation Guideline	Complaint Procedure	Appeal Procedure
Who starts the action?	Anyone in the construction industry.	Companies wanting to remain confidential or are not in the project chain of command.	Companies and individuals in the chain of command of a construction project.	Certified facilities or applicants to AISC Certification.
What?	<p>This procedure provides a method to address and resolve matters regarding companies that make false claims regarding their AISC Certification status.</p> <p>Examples include:</p> <ul style="list-style-type: none"> – Misleading facility signage – Fraudulent use of AISC Certification logo – Misrepresentation of a company's AISC Certification status 	<p>This guideline is available to resolve allegations made against certified facilities by parties or individuals in the chain of command of a construction project for which an AISC certified facility has supplied materials or services when that party wishes to remain confidential, or by third-party companies or individuals that are not in the project chain of command.</p>	<p>This procedure is available to resolve formal complaints made against certified facilities by parties or individuals in the chain of command of a construction project for which an AISC certified facility has supplied materials or services.</p>	<p>This procedure establishes an agreed method for auditees to appeal and resolve all disputes related to a final audit that has been written and issued by QMC and accepted by AISC.</p>
Why?	To eliminate certification misrepresentation within the fabrication and erection industry.	To address allegations against certified facilities and resolve these issues.	To address complaints against certified facilities and resolve these issues.	To allow certified facilities or applicants the ability to appeal certification decisions made by either AISC or QMC.
How?	The offending company will be contacted by AISC Certification with a warning to remove said claims. If this is not successful after two different communications, AISC General Counsel will conduct cease and desist efforts.	The allegation will be reviewed by an Ad Hoc AISC Review Board to determine the reasonable probability of the allegation. If it is deemed reasonable, the allegation will be investigated by a member of AISC Certification and the results submitted to the Ad Hoc Board for resolution, which may result in a special audit.	The complaint will be submitted to AISC for initial determination. If the complaint is deemed reasonable, the certified facility will be notified and a Complaint Review Task Group will be formed to investigate and recommend a course of action to AISC and the AISC Certification Committee. The Committee will make the final decision and notify the certified facility.	The appeal is submitted to and reviewed by AISC at which point: <ol style="list-style-type: none"> 1. it will be overturned, 2. it will be denied, or 3. an additional audit will be ordered. If the third option is selected, an assessment team will conduct the audit and submit its findings to AISC for a determination of the appeal. If the auditee wishes to challenge the appeal result, the matter will be submitted to binding arbitration.