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# **Supplement 4 to EA-2/02 EA Procedure for the evaluation of a National Accreditation Body**

## **Procedure for remote peer evaluations during the COVID-19 pandemic**

### ***PURPOSE***

This document provides guidance for planning and performing the peer evaluations during the COVID-19 pandemic.

*Authorship*

This document has been prepared by the EA MLA Council (MAC).

*Official language*

The text may be translated into other languages as required. The English language version remains the definitive version.

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## 1 FOREWORD

Historically the performance of peer evaluation of a national accreditation body by other national accreditation bodies has been mainly based on on-site exercises. Governmental and health authorities' confinement dispositions coming from the COVID-19 pandemic raised critical difficulties to the maintenance of such approach. However, it accelerated the development and dissemination of information and communication technologies supporting on-line meetings, sharing files and devices screens, etc. which are useful tools to be integrated within the peer evaluation process.

How to properly balance the traditional approach with the use of remote tools for peer evaluations under normal circumstances and considering the specific risks is still an exercise to be developed which depends on IAF/ILAC reference documents (particularly IAF/ILAC A2) and complementary dispositions.

Whatever the case, the current EA perspective is that, under normal circumstances, it would not be desirable for peer-evaluations to become a complete digitalized remote exercise in the future. A peer-evaluation should also be an opportunity for ideas, problems, and solutions to flow collaboratively between the team and the national accreditation body under evaluation but also within the peer evaluation team<sup>1</sup>. This is indispensable to sustain similar levels of harmonization and maturity within the accreditation community and for this a face-to-face meeting is considered to be a more beneficial and efficient approach.

This document was developed to support keeping the necessary level of confidence in the EA peer-evaluation system during the COVID-19 pandemic but also for other potentially similar unforeseen circumstances in the future. It considers that performing fully remote peer-evaluations is unavoidable in the short term. Some of its elements could also be considered during the consolidation of the EA peer evaluation reengineering project where expectably the evaluation methods to be applied could include a combination of both on-site and remote activities in line with the specific risks identified.

Peer evaluations can, and normally do, use several evaluation techniques such as file reviews, interviews and on-site witnessing of accreditation bodies performing assessments.

IAF/ILAC current requirements applicable to regional groups when performing peer-evaluations of accreditation bodies (IAF/ILAC A2) are generally silent regarding the subtleties of the different evaluation methods, their advantages and disadvantages or recommendations on how to combine them, considering the specific circumstances and risks.

While they do not expand on issues such as the accreditation body size, complexity, geographical expansion, proven maturity and past performance and other factors, which seem

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<sup>1</sup> Current available definitions of peer-evaluation do not properly reflect these elements:

- Regulation (EC) No 765/2008: peer evaluation shall mean a process for the assessment of a national accreditation body by other national accreditation bodies, carried out in accordance with the requirements of this Regulation, and, where applicable, additional sectoral technical specifications;
- ISO/IEC 17000 (and ISO/IEC 17040): peer assessment - assessment of a body against specified requirements (5.1) by representatives of other bodies in, or candidates for, an agreement group (9.10)  
Note 1 to entry: "Candidates" are included for the situation where a new group is being formed, at which time there would be no bodies in the group.  
Note 2 to entry: The term "peer assessment" is sometimes referred to as "peer evaluation".

indispensable for a risk-based approach to peer-evaluations, they are quite prescriptive regarding the number and nature of witnessing activities to be performed (Annex 2, B 2.3). This prescriptive character goes to the point of referring to the witnessing of on-site assessments while a significant number of accreditation bodies are currently limited to performing remote assessments.

Policies established by this document are generally consistent with EA-2/02 dispositions. It needs to be recognized, however, that they provide room for a more flexible approach regarding witnessing activities when compared with the prescriptive nature of the current rules as derived from IAF/ILAC-A2.

Nevertheless, that flexibility is expected to be in line with IAF/ILAC document(s) having been developed regarding the performance of peer-evaluations of regional groups and of individual accreditation bodies during pandemic and similar circumstances.

It is also consistent with a remote peer evaluation focused on its goals and not on its processes.

## 2 REFERENCES

- ISO/IEC 17011:2017 - Conformity assessment — Requirements for accreditation bodies accrediting conformity assessment bodies
- IAF/ILAC A1 - IAF/ILAC Multi-Lateral Mutual Recognition Arrangements (Arrangements): Requirements and Procedures for Evaluation of a Regional Group
- IAF/ILAC A2 - IAF/ILAC-A2:01/2018 IAF-ILAC Multi-Lateral Mutual Recognition Arrangements (Arrangements): Requirements and Procedures for Evaluation of a Single Accreditation Body
- IAF/ILAC-A1/A2: Addendum 01/2021 - IAF/ILAC Approach to Remote Peer Evaluations of Regions and Single Accreditation Bodies during the COVID-19 Pandemic

## 3 GENERAL POLICY

Policy elements	Justification and other considerations
<p>Until further decision by the MAC all EA peer-evaluations starting from 2021-01-01 can be, and normally will be, performed as fully remote exercises.</p>	<p>The current pandemic circumstances would not be consistent with another systematic approach.</p> <p>To keep a peer-evaluation open for a long period (e.g. doing office activities remotely in the beginning of 2021 and waiting for normal circumstances to perform witnessing activities remotely) would be a disproportionate administrative and logistical burden and also a technical risk (lack of representativeness of the peer-evaluation outcome after a long period).</p> <p>A mitigation strategy needs to be established for any specific risk coming from performing a fully remote peer</p>

Policy elements	Justification and other considerations
	<p>evaluation. If needed (subject to MAC decision), an on-site additional peer-evaluation will be performed within a shorter period (e.g. 2 years).</p> <p>To reschedule a peer-evaluation planned to be remotely performed as a standard on-site exercise is something that needs to be considered when the health situation is normalized.</p> <p>Peer-evaluations planned to start at least 3 months after an agreed normalization reference date as remote exercises should be adapted to be implemented with the standard on-site approach.</p>
Remote evaluations shall follow as close as possible the usual peer-evaluation process established in EA-2/02.	Deviations from the standard process shall be those strictly necessary.
Initial peer-evaluations shall be performed on-site.	<p>Initial evaluations will be delayed until standard processes can be fully used since the knowledge of an applicant NAB capability is still to be determined.</p> <p>This does not apply to extensions-only peer-evaluations.</p>
Witnessing assessments should be reduced as extensively as possible.	<p>To manage remote witnessing of assessments is a logistical challenge.</p> <p>Additionally, the added value of always witnessing mature NABs performing assessments is questionable.</p> <p>Unless there are facts from the previous peer-evaluations (or from our relevant sources of information such as complaints) favouring a different approach, witnessing should be minimized (see 6.3).</p>
NABs shall not be subject to two consecutive completely remote full evaluations unless explicitly decided by the MAC.	The benefits from face to face sharing of experiences should not be postponed indefinitely.

#### **4 REMOTE PEER EVALUATION PROCESS**

All elements, responsibilities and authorities stated in EA-2/02 Section 3 (Flow Chart for the Evaluation Process) are applicable.

There are exceptions regarding the preparation of the programme for the visit and the visit itself as developed below.

##### **4.1. Preparation of the programme for the visit**

All remote peer-evaluations will be preceded by a risk and feasibility analysis – see Annex 1 – supported by the performance of one or more test connections.

A remote peer evaluation requires extra effort in its planning since e.g. significant adjustments are more complex to be performed. This includes the identification of the specific interlocutors assigned to each team member at each moment of time.

The team leader from the previous peer-evaluation could be invited to contribute to the design of the current peer-evaluation.

The following elements need to be considered and agreed in advance:

- Which technology(ies) are going to be used (e.g. MS Teams, Zoom, WhatsApp, Adobe Connect, etc.) and the number of independent connections required;
- Recording of peer evaluations is not permitted;
- Meetings between the NAB and team is under the responsibility of the NAB. Meetings among the team members is under the responsibility of the Team Leader – these meetings can also be hosted by the NAB (provided that the NAB is not normally attending the meeting except when requested to);
- Any specific concern about IT security and/or personal data protection;
- Any additional documentation (in relation to the standard package) that needs to be sent by the NAB prior to the evaluation or that needs to be made available by the NAB for the evaluation (e.g. ensuring that paper information is available digitally when requested);
- An indication that the peer-evaluation team shall be free to select at any moment the visualization provided by the NAB, that it shall be a live transmission, without any restriction, as it would be with an on-site approach;
- An indication that an evaluator may request the control of the visualization provided;
- The NAB's commitment to inform the evaluation team whenever any foreseeable change in the connection(s) conditions;
- A disclaimer that the duration and timetable are dependent on the connections' efficiency and the evaluated body responses which can lead to the need to introduce adjustments to the evaluation plan.

The plan needs to consider breaks as usual during on-site evaluations and the outcome of the risk and feasibility tests (see Annex 1).

A standard one-week on-site visit could be extended for instance to two weeks in order to accommodate the potential for less evaluation efficiency, to better accommodate the team's interlocutors availability and overlapping requests, proper time for the team's internal meetings and to impose fewer constraints to preferred days for witnessing.

An example of a remote peer-evaluation plan is illustrated below.

Any indispensable remote witnessing activity can be performed in advance, normally not more than 4 months before the office remote visit.

For a full re-evaluation, the risks and feasibility tests shall be performed at least two months before the opening meeting. Any needed mitigation action (see Annex 1) shall be in place before the opening meeting.

Example of a remote peer-evaluation overview plan (for this example, Witnessing was considered indispensable for TM1, TM2 and TM6)							
Day	TL	TM1	TM2	TM3	TM4	TM5	TM6
1	Team meeting						
2							
3							
4	Office: Opening meeting						
	Office	Office	Office	Office	Office	Office	Office
5	Office	Office	Office				Witnessing
	Office	Office	Office				Witnessing
6	Office		Witnessing	Office	Office		Office
	Office		Witnessing	Office	Office		Office
7			Office		Office		Office
			Office		Office		Office
8	Team meeting						
9							
10							
11		Witnessing		Office		Office	
		Witnessing		Office		Office	
12	Office	Witnessing			Office	Office	
	Office	Witnessing			Office	Office	
13				Office		Office	
				Office		Office	
14	Team meeting						
15	Office	Office	Office	Office	Office	Office	Office
	Office: Closing meeting						

## 4.2. Visit to the accreditation body

The table below provides an overview of challenges, examples of specific topics to consider and technological issues regarding each activity and/or evaluation method (technique) when to be performed remotely.

Activity   Evaluation method	Comments
Team's preparatory meeting	A remote meeting using a tool as MS Teams is appropriate. For some elements it is even beneficial as compared with the standard approach as it can be done with the proper time, the week before, and not after a flight, etc. during a Sunday. → 1 connection for the full team only
Opening meeting	A remote meeting using a tool such as MS Teams is appropriate. → 1 connection to the full team and the NAB representatives → 1 private connection only for the Team.
Evaluation   Interviews	Remote meetings using a tool as MS Teams is appropriate. See Annex 1 for specific risks. Synchronous video and sound signals are important aspects as non-verbal communication is a key element in interviews. → 1 autonomous connection for each Team member
Evaluation   Document and record review	Remote meetings using a tool as MS Teams is appropriate. See Annex 1 for specific risks. Synchronous video and sound signals are important aspects but also the level of digitalization of the NAB. The team needs to check first if some specific records (e.g. for file review) need to be digitalized first or if a video capture of a paper record provides quality enough. → 1 autonomous connection for each Team member



Activity	Evaluation method	Comments
Evaluation	Witnessing	<p>This is more demanding activity to be properly addressed remotely as it includes a paraphernalia of potential different situations considering different vectors:</p> <p>(a) It may not depend exclusively on the NAB good will regarding attitude but also technological conditions available. The level of cooperation needed from the CAB would be higher when compared with the standard practice.</p> <p>(b) The assessment techniques to be witnessed depends on the nature of the CAB, for example:</p> <ul style="list-style-type: none"> <li>- For the assessment of certification bodies, normally only the so-called office assessment is witnessed. This involves mainly interviewing the certification body personnel and checking records in a frequently high digitalized environment. That means that even a fixed device capturing video and sound should be enough for supporting a proper connection. The NAB should ensure that all CAB representatives are enabled to share relevant information through the connection(s) available.</li> <li>- For the assessment of laboratories, normally the accreditation body also witness the performance of calibration or testing (or sampling or examination) activities. Furthermore, the level of automation of the laboratory activities can be extremely high with little human interaction or strongly depending on operators' specific skills. Whatever the case, this may require frequent adjustments of a capturing device (physical position, zooming, etc);</li> <li>- For the assessment of inspection bodies, the practical conditions would be frequently even more complex as the NAB would be witnessing on-site inspection activities probably in a industrial environment.</li> </ul> <p>(c) The accreditation body may be performing a classical on-site assessment, a completely remote assessment, or some combination.</p> <p>Thus, it could be essential that the feasibility tests also involve the CABs and some preparatory work performed at CABs facilities (or representative of the facilities that the CAB is visiting). The team needs to consider this carefully.</p> <p>Furthermore, it could be investigated if it is possible to perform the assessment in English. Otherwise, an additional independent connection between the team member and a translator may be indispensable.</p> <p>→ 2 independent connections for each Team member may be needed:</p> <ul style="list-style-type: none"> <li>- One providing video and sound capture of the assessment.</li> <li>- Another private for the evaluator and the translator (and frequently for a NAB representative in cases with the involvement of professional translators). This may need request to use a different app as some do not support more than one simultaneous connection.</li> </ul> <p>See also 4.3.</p>
Team's intermediate meetings		See comments for the Team's preparatory meeting.
Closing meeting		See comments for the Opening meeting.

### **4.3. Witnessing**

The following policy elements are to be considered when defining the amount and nature of witnessing activities to be performed:

- Witnessing of on-site assessments can be replaced with witnessing of remote assessments.
- Pre-evaluations can be performed completely remotely.
- Initial evaluations shall be performed on site and include on-site witnessing of assessments (remote assessments can be witnessed remotely).
- Extensions of scope of recognition to include a new level 3 standard will need witnessing of assessment(s) performed by the accreditation body (except if otherwise decided as it could be the case with ISO/IEC 17029). Both on-site and remote assessments can be witnessed remotely.
- Cases where a specific level 3 was witnessed during the last two peer-evaluations can be exempted for witnessing during the next peer-evaluation. This will require that, subject to analysis by the Team Leader and endorsement by the Management Group, there are no findings coming from the previous evaluation that require witnessing to confirm the effectiveness of proposed corrective actions.
- Peer-evaluation teams shall address how the NAB is considering the use of the remote assessments within its accreditation cycle. This may include (remote) witnessing of remote assessments. Normally a sample of 2 days would be sufficient.
- Independently of the above, in cases where EA identifies some form of witnessing on-site assessments as necessary, then it shall be performed.

The level of witnessing to be addressed in each peer evaluation will be subject to agreement between the Team Leader and the MAC Management Group member assigned to follow the Peer Evaluation.

Diminishing the level of witnessing activities neither means collecting less or less representative information nor reducing the time dedicated to peer-evaluation. It means that some witnessing will be replaced by other evaluation techniques.

It can be an added value to extend the files reviewed, to have more time for interviews and even to involve relevant players within the accreditation system that frequently are not deeply involved.

## **5 SPECIFIC COMPETENCE REQUIREMENTS FOR PEER EVALUATORS**

Considering that several activities at the accreditation body level are currently performed with the help of the same ICT tools are the same to be considered for remote evaluations, and the attributes expected from peer-evaluators (e.g. open-minded), it was decided not to establish any additional explicit requirement at this level.

Evaluators will be asked in advance to declare that they are able to properly use the relevant ICT technologies involved. Any unexpected difficulty revealed during the test connections will be reported by the Team Leader to the Secretariat. If needed the Secretariat will involve the MAC Management Group in order to solve those difficulties.

## ANNEX 1: RISK AND FEASIBILITY ANALYSIS & TEST CONNECTIONS

One or more test connections shall be performed beforehand in order to identify risks and to conclude on remote peer-evaluation feasibility. Normally risks graded as 3 or 4 would prevent considering the use of remote peer-evaluations. During exceptional circumstances, as the current COVID-19 pandemic where in practice on-site evaluations are not possible, specific mitigation strategies for those cases need to be defined and their appropriateness confirmed.

Risk source	Grade <sup>2</sup> (1-4) & Mitigation strategy
<p>1. Asynchronous video The normal goal is to provide a proper environment for live interaction (i.e. synchronous video) between the evaluation team and the NAB (independently of recorded video could be used for specific circumstances)</p>	
<p>2. Team cannot choose the visualization The evaluation shall be conducted by the evaluation team and not by the NAB and it shall be possible for an evaluator to take control of the visualization</p>	
<p>3. Remote connection instable or slow Normal interaction between the team and the NAB shall be possible, without video and/or sound delays</p>	
<p>4. One or more team members cannot act autonomously Normally each evaluator shall be able to establish an independent remote connection with the NAB. It shall also be possible for the team to establish private remote meetings during the evaluation</p>	
<p>5. Lack of familiarity with the specific technology The specific app or apps to be used will result from an agreement between the team and the NAB. Thus, some of those involved could be not familiar with a specific app idiosyncrasies. This implies that the test connections shall involve all the apps agreed in order to be sure that those involved are comfortable with their use. The selected main apps shall support, as a minimum: - Live video and sound transmission, - Sharing computers screens.  Additionally, it is recommended that those apps support: - Sending files, - Exchanging the control of visualization, - Private chatting between specific participants in a meeting (connection).</p>	
<p>6. Risks to successfully interview persons The team shall identify the persons to be interviewed and confirm during the test connections that it is feasible. Normally the interview shall be performed with live video and sound. As an essential part of human communication is not verbal it is normally indispensable to have access to a live video signal.</p>	

<sup>2</sup> 1: Risk null or negligible; 2: Risk under proper control; 3: Risk not controlled; 4: Significant risk

Risk source	Grade <sup>2</sup> (1-4) & Mitigation strategy
<p>7. Risks of proper access to documents and records                      The team should have a clear picture of the level of digitalization of NAB under evaluation. It is indispensable to know beforehand which documents and record are not digitally available – remote access to paper records, although feasible, is time consuming.                      Proper access to key databases and other IT systems shall also be tested.                      The team shall list the type of document and records and confirm that they are accessible during the test connection.</p>	
<p>9. Risks to proper witness assessments                      See 4.2.</p>	
<p>11. Confidentiality                      (To develop)</p>	
<p>12. Personal data protection                      (To develop)</p>	
<p>13. Other?</p>	