

PJLA Update Notification

Update Notification # 10

Update Notification Release Date: July 14, 2010

Form/Procedure/Policy: Updates to PL-2 Measurement Traceability Policy

PJLA Applicant/Accredited Laboratories

CC: PJLA Assessors and Staff

Attention all ISO/IEC 17025:2005 Accredited and Applicant Laboratories:

Misunderstandings among laboratories and members of the PJLA assessor staff concerning measurement traceability and the means of evaluating claims of traceability have prompted a recent review of PL-2 Measurement Traceability Policy. Although the misunderstandings discovered are not widespread they are persistent. Following are several common examples.

Submission of a NIST number by a laboratory or acceptance of a NIST number by an assessor as evidence that calibration results are traceable.

Test report numbers issued by NIST are used solely for administrative purposes. Although they often uniquely identify documents that bear evidence of traceability, they are not to be accepted as evidence of traceability.

Accepting as traceable the results of equipment calibration by a non accredited OEM without the independent confirmation of traceability by means consistent with PL-2.

The results of calibrations performed by an OEM that is accredited to ISO/IEC 17025:2005 are accepted as traceable on the basis of accreditation status. An OEM that is not accredited may be capable of providing calibration results that are traceable but traceability must be established by means consistent with PL-2. The fact that a calibration is performed by an organization that happens to be the OEM for the equipment being calibrated has no bearing whatsoever on the traceability of the results.

PL-2 has several changes resulting from this review. They are of a minor nature and are intended to promote a uniform and consistent understanding of the process for

establishing the validity of claims of traceability for calibration results when a laboratory uses (subject to PJLA approval) the services of non accredited laboratories for calibration.

Paragraph 2 of page 4 (below with changes shown in italics)

In the event that the applicant laboratory employs the services of an external calibration provider, PJLA requires that said external laboratory be accredited to ISO/IEC 17025:2005 for the calibration performed or *deemed competent* by a National Metrology Institute (NMI) recognized by the CIPM Mutual Recognition Arrangement (MRA). *Evidence of competency might take the form of the Certificate of Measurement Traceability issued to State Laboratories by NIST in the US economy.* As an APLAC/ILAC MRA signatory, PJLA recognizes and accepts the accreditations of laboratories issued by other MRA signatories. The applicant laboratory shall have on file and make available to PJLA assessors the current certificate and scope of accreditation of the calibration laboratory used. PJLA recognizes that there may be cases where utilizing an ISO/IEC 17025:2005 accredited calibration laboratory may not be possible. In this case, the laboratory must be able to demonstrate and substantiate (*typically with documentary evidence*) traceability for the measurement service that was provided by the non-accredited laboratory.

The changes in the paragraph above are intended to remove the potential implication that the NMI accredited calibration laboratories. Also, to give an example of evidence (documentary in this example) that an NMI (NIST in this case) deemed a laboratory to be competent.

Paragraph 3 of page 4 (below)

This paragraph defines the activities of an applicant or accredited laboratory and its interactions with PJLA when it employs the services of a non-accredited external calibration provider. It was previously contained in a note at this location in the policy and has now been designated as a requirement.

Use of non-accredited external calibration providers will be approved on a case-by-case basis. PJLA HQ and Assessor approval will be required. When an approval is issued, the laboratory receiving the deviation will be solely responsible for verifying traceability of the calibration or calibrations performed by the non-accredited external calibration provider. Such verification shall be maintained on file by the laboratory and shall consist of any documentation provided by the external calibration provider and the basis for the laboratories acceptance of the claim of traceability. All documents and records associated with the laboratories verification shall be made available for review by PJLA staff or assessors upon request. PJLA reserves the right to reject a claim of traceability if in the opinion of PJLA all necessary requirements for establishing traceability have not been satisfied. Should it be determined that a claim of traceability is not adequately established and therefore rejected, PJLA will initiate its policy for removal of the affected calibration or test activity from the scope of accreditation of the laboratory involved. Laboratories should consult the NIST or other appropriate NMI websites for information required to demonstrate and substantiate traceability.

Designating the paragraph above to be a requirement rather than a note as it previously was is consistent with the original intent when the policy was written.

PJLA has provided an informational document dealing with the topic of establishing traceability for calibration and testing results. It is a PowerPoint presentation that can be found at the following link.

<http://www.pjlab.com/techDocs.htm>

Select item number 5 “Traceability Overview” under the Technical Documents section. Additional documents will be added to the website including a checklist to assist in identifying and documenting the elements necessary to establish a valid traceability chain.

We thank you for your participation in regards to these changes. If you have any questions in regards to the above, please feel free to contact PJLA at anytime.

Thank you.