

July 8, 2015

TO SEI NOCSAE PARTICIPANTS:

SEI Certification Bulletin #12 – FAQ Series: SEI Quality Audits, Certification Deadline Dates & SEI NOCAE Logo

After working for the past several weeks with NOCSAE participants and contacts on completing initial certification requirements, we have identified some common issues. As a result, SEI has developed a list of commonly asked questions and responses that should be beneficial to all participants moving forward with certification.

Why does the headquarters location have to be audited when there is no manufacturing taking place at this location?

Per the SEI CPM Section 11: Quality Assurance the purpose of conducting quality audits is as follows:

The purpose of the SEI Quality Audit is to determine the adequacy of a manufacturer's Quality Management System and assure that product continues to meet applicable performance standards. The approach taken in auditing is to audit for the prevention of problems and not just detection. It is aimed at continuous improvement. Therefore, systems for both prevention and detection will be audited. Audits of product are included as a part of the overall audit scope. The SEI Quality Audit shall also provide the manufacturer with information on deficiencies in their Quality Management System.

In order to achieve the stated purpose, it is important that SEI include as part of the audit process each participant's headquarters location. The corporate headquarters quality management system is critical in maintaining the quality of the products that are distributed to the public. Applicable sections of the corporate quality management system, especially the NOCSAE QC/QA processes, should be reflected in your supplier's quality management systems as well.

What specific items from the Audit Checklist are being audited at the headquarters location?

We call your attention to SEI Certification Bulletin #11 which identifies those items that are covered during a headquarters audit. Additionally, we can provide you with feedback from our team of auditors as a result of recent headquarter audits. Our auditors have found that several participants do not have documented procedures for processes that take place at the headquarters location. In a few cases the auditor has identified procedures are in place, however they are not controlled by revision level or date.





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What criteria are the auditors looking for when they are auditing the NOCSAE QC/QA requirements?

While there is no definitive criteria given for the NOCSAE QC/QA statistical compliance requirement, SEI will provide you with guidelines that our team of auditors have developed for the NOCSAE QC/QA requirements, as follows:

ND011 references either attributes or variable measurements. For attributes various standards are referenced, for example ISO 2589-1, international standard for sampling plans using AQL. All referenced sampling standards will be of a similar nature. The company must have a copy of the standard they are using as a basis for their sampling - this is attribute testing, i.e. sample taken per lot in accordance with sampling plan / tests conducted / pass / fail criteria applied.

Single sampling plans, normal inspection level II or IV to be used, ref ND011, 4.3.

Variable measurements are SPC (Statistical Process Control) based where the process will already have been established as under control and limit parameters established by statistical analysis. Each lot thereafter produced is sampled throughout the production run and the samples, 3 to 5 in quantity, are then measured for this variable and must be within the acceptance limits. This is an involved process and most companies will follow the attribute sampling process.

Each participant's headquarters location shall have a quality procedure and/or flow chart demonstrating their QC/QA sampling plan in accordance with NOCSAE ND001 Section 6.3. This procedure shall also be available at the participant's supplier (manufacturing) locations and/or locations where QC/QA testing is conducted. The SEI team of auditors will be looking for (1) evidence of the QC/QA plan, (2) reviewing the procedure to insure that it meets the requirements of NOCSAE ND001 Section 6.3, and (3) that the procedure is being executed at all applicable QC/QA testing locations.

Please note that the NOCSAE QC/QA document/evidence described above is in addition to the Quality Manual which all participants are also expected to have.

If we use an independent external testing facility for our NOCSAE QC/QA testing program, what criteria must that lab meet and will it be audited?

Subcontracting QC/QA testing at the participant level is acceptable if an approved sampling plan is provided by the participant and the laboratory is following the participant's procedure. NOCSAE has required SEI to audit any subcontract (or outside) laboratory to witness the testing and confirm test equipment. The only exception that could apply is if the contract (or outside) laboratory is ISO 17025 accredited and has the appropriate NOCSAE standard(s) on their scope. The laboratory will need to provide their scope of accreditation to SEI and evidence that they are using the correct equipment or equipment with demonstrated equivalence for the NOCSAE testing.

What does the certification deadline date mean?

In accordance with the NOCSAE bulletin (email) sent to all NOCSAE licensees on April 3, 2014:

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SEI certification will be the only valid certification of compliance with the NOCSAE standard for any newly manufactured athletic equipment subject to the NOCSAE standards. Once the SEI certification program is operational, it will list on its website all products by brand and model name/number which have been certified by SEI as compliant with the NOCSAE standard.

If a specific product/model has not been SEI certified by the deadline date, that product/model can no longer be manufactured using the NOCSAE logo or the SEI NOCSAE logo. A certification letter has to be issued by SEI in order for the SEI NOCSAE logo to be used on a product/model.

As determined and agreed upon at the Summer 2014 NOCSAE board meeting, the following certification deadline dates were established by NOCSAE:

- August 31, 2015
 - Baseball/Softball Products
- October 31, 2015
 - Football Products (except football gloves)
 - Lacrosse Products
- December 31, 2015
 - Football Gloves
- January 31, 2016
 - Soccer Products

Why did NOCSAE modify the SEI NOCSAE logo? What SEI NOCSAE logos will be accepted by SEI for product certification? How long do we have to transition from a sticker logo to a more permanent logo?

Due to the different publication dates of standards and subsequent logo decisions, it was identified that the SEI NOCSAE logo varied in some of the NOCSAE standards. As participants are preparing their products for certification, it is vital that the correct SEI NOCSAE logo is understood. The new language on the SEI NOCSAE logo shall read "SEI Certified". Laboratories will be reviewing the product labels and will be looking for this specific language.

Some participants have asked if SEI will accept SEI NOCSAE logo language that has been published in prior NOCSAE standards, such as "SEI Certified Model" or "SEI Certifies". It is SEI's preference that the correct language, "SEI Certified" be used. However, if investments in mold changes have already been made and "SEI Certified Model" has been used SEI will accept that language as that is acceptable language in our other SEI certification programs. "SEI certifies" is not acceptable language. The word "Certifies" implies a continuing certification beyond the "compliance when tested" basis for any certification, and the clarification is intended to clarify the fact that the certification is as of the date of manufacturer.

If a participant chooses to use an interim SEI NOCSAE logo, such as a sticker, they must provide SEI with a plan on when they will transition to the permanent SEI NOCSAE logo. The transition plan should outline a specific timeline for when their product lines will all have the permanent SEI NOCSAE logo. SEI will evaluate each participant's transition plan on an individual basis.

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We hope you have found this FAQ series bulletin to be beneficial. If at any time we can answer any questions please contact me or a member of the SEI staff.

Sincerely,

Tricia Hock

Program Development Director

cc: SEI Board of Directors SEI Quality Auditors SEI Testing Laboratories

> NOCSAE SFIA