

PCI Erector Certification Program Remote Company Audit Procedure

1. INTRODUCTION

PCI has established this procedure for Company Quality Audits required by the PCI Erector Certification Program (PCI Policy 29).

This document is supplemental to existing Company Quality Audit procedures and describes optional offsite auditing methods and activities that utilize information and communication technologies (ICT) to obtain evidence of an erector's conformity to the PCI Erector Certification Program requirements. This technique is referred herein as a **remote audit**.

2. DEFINITIONS

- 2.1 Information and communication technologies (ICT):** The use of technology for gathering, storing, retrieving, processing, analyzing and transmitting information will be required. It includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others. The use of ICT may be appropriate for auditing both locally and remotely.
- 2.2 Remote Audit:** Audit technique that effectively applies offsite audit methods utilizing ICT as a means to obtain evidence of an erector's conformity to the program requirements. Examples of remote auditing (use of ICT) may include but are not limited to:
- Meetings; by means of teleconference facilities, including audio, video and data sharing
 - Audit of documents and records by means of remote access, either synchronously (in real time) or asynchronously (at different times when applicable)
 - Recording of information and evidence by means of photographs, video or audio recordings

3. REMOTE AUDIT REQUIREMENTS

- 3.1** The Remote Audit can only be conducted for eligible clients and have the means to accommodate the remote audit. (See Remote Audit Eligibility Criteria, section 3.6) The remote audit is to be conducted in accordance with the procedures described in this document.
- 3.2** The auditor and the client should understand the risks and opportunities of the information and communication technologies used and the impacts that they may have on the validity and objectivity of the information gathered.
- 3.3** The use of remote auditing methods shall not compromise the integrity or quality of the company audit process via a full document review of a sampling of an erector's completed precast concrete projects. PCI and the Certified Company Auditor will ensure that adequate controls are in place to avoid abuses that could compromise the integrity of the audit process.
- 3.4 Equipment used during the remote audit**
Remote audits will be conducted using the appropriate hardware and software. Auditors and PCI Staff must have access to the equipment necessary to accomplish the audit plan. They must also be familiar in the use of the hardware and software to be used for the purposes of remote auditing. The following is a list of commonly used hardware and software:

a) Standard Hardware

- computer with audio, video and recording capabilities, such as webcam/video camera, microphone, or wearable technology (if available)
- telephone or smartphone
- handheld devices when necessary

b) Standard Software

- web browser with security and data protection measures in compliance to current regulations (i.e. – firewalls, such as local VPN or Windows Defender)
- email with send and receive capability
- electronic file share capability (i.e. – YouSendIt or DropBox)
- Microsoft Office and Adobe Reader (required for auditors to open files)
- teleconference software or web-based applications (i.e. - GoTo Meeting, Zoom Meeting or Skype)

3.5 The Remote Audit Environment

As with any audit, the remote audit should be performed in an appropriate environment intended to facilitate achieving the audit plan and objectives. Additional concerns during a remote audit include:

- a) The auditor should be stationed in an area where there will be minimal background noise, distractions, and interruptions.
- b) The auditor's computer and other equipment should be appropriately situated to provide convenient access, communication, and document viewing.
- c) Reliable internet and communication service are required.
- d) Breaks should be taken at appropriate and agreed upon intervals.

3.6 Remote Audit Eligibility Criteria

3.6.1 To be eligible:

- i. The client must have means to share files with the auditor and be available for interviews with the auditor via ICT during the remote audit.
- ii. The remote audit scope must be able to confirm the client's quality management system complies with the general quality management system requirements.

3.6.2 Certified erectors in good standing with PCI are eligible to undergo a remote audit.

3.6.3 Applicants cannot undergo a remote audit for their initial certification.

3.6.4 Some Special Audits (SA) and Special Immediate Audits (SIA) may be eligible for remote audits, when the purpose of the audit can be satisfactorily achieved through the use of ICT, pending PCI review and approval. If the SIA results from a failed audit, then PCI will determine the appropriate path for the erector to be eligible for continued certification.

3.6.5 Company audits should rotate between remote and in-person audits. The erector shall not have more than two consecutive remote audits, unless superseded by extraordinary events (such as, COVID-19 quarantine restrictions or local restrictions).

3.6.6 During extraordinary events or if local restrictions do not allow for an in-person audit, additional consecutive remote audits are permitted, until normal pre-extraordinary event business operations resume. Local restrictions/extraordinary events over-ride PCI policy and criteria for remote audits.

3.7 Client Requirements

3.7.1 To share files prior to the audit, the client can choose from the following ICT options:

- Web-based email
- Web-based file-share application or software
- Provide hard copies to the auditor

- 3.7.2** During the remote audit, the client must have means to share files with the auditor and be available for interviews via ICT. To share files during the audit, the client can choose from the following ICT options:
- computer with audio and video, using web-based teleconference application or software
 - telephone, smartphone or handheld devices
 - facsimile
- 3.7.3** To be available for interviews during the audit, the client can choose from the following ICT options:
- computer with audio and video, using web-based teleconference application or software
 - telephone, smartphones, or handheld devices
- 3.7.4** Preferably, the entire remote audit is conducted through web-based teleconference application or software. It is possible for a remote audit to be conducted only using mail, facsimile, and telephone, though this is the least favorable option.

4. SECURITY AND CONFIDENTIALITY

- 4.1** The security and confidentiality of electronic or electronically-transmitted information is particularly important when using ICT for audit purposes. The use of ICT for audit purposes shall be mutually agreed upon by the client and PCI before ICT is used for audit purposes. If appropriate security and confidentiality measures cannot be implemented and agreed upon, PCI shall use other methods to conduct the audit and fulfil audit objectives.
- 4.2** Prior to utilizing ICT, PCI will verify appropriate measures are in place to ensure that security and confidentiality is maintained throughout the remote audit activities. These include, but are not limited to:
- Limiting access to any copies of documents provided in advance of the remote audit.
 - Limiting viewing access to documents or video shared during the audit.
 - Not recording or retaining images of documents or video shared during the audit without the permission of the client.
 - Not sharing sign-in or password credentials.
 - Auditor destruction or erase of any provided information shall occur after the audit nonconformances are satisfactorily completed.

5. GENERAL REQUIREMENTS

- 5.1** The procedures described in this document supplement PCI's regular company in-person audit program procedures.
- 5.2** All regular PCI recertification and renewal procedures apply to clients while these remote audit procedures are utilized based on a frequency determined in other sections of this procedure. The appropriate PCI staff representative shall make the final certification decision, which includes a review of audit findings and the Client's compliance with the requirements of the erector certification program.
- 5.3** A client's annual audit schedule alternates between an onsite audit and remote audit, with no more than two consecutive remote audits.

6. ACTIVITIES IN ADVANCE OF THE AUDIT

- 6.1** Prior to contacting the erector, the company auditor will review the erector's field audits and previous company audit as part of the pre-audit documentation review process according to existing standard pre audit procedures.
- 6.2** The Company Auditor will contact the erector (email or phone) and use the Remote Audit Eligibility Criteria and Client Requirements (Section 3) to determine the options to maintain certification and to determine if a remote audit is feasible. The purpose of this initial contact is also used to:

- establish communications with the erector's representatives
 - confirm the authority to conduct the audit
 - make arrangements for the audit, including scheduling the date(s)
 - confirm the agreement with the erector regarding the extent of the disclosure and the treatment of confidential information
 - determine any specific requirements for access and security of documents
 - confirm agreement to the general audit plan
- 6.3** The company auditor will email the Introductory Letter to the erector requesting the erector to provide a list of all projects erected since the last Company Audit to plan the audit. The erector must respond to the company auditor with a project list and should confirm the date for the remote audit within 2 weeks of being contacted unless a different timeframe is agreed upon by both the company auditor and the erector. (See: Appendix A – Remote Audit Introductory Letter). The project list should be received by the company auditor within the timeframe and should contain the following information:
- Project name and location and Erector's contractual relationship (precaster or GC/CM)
 - Brief description of project type, scope, and size
 - Dates of erection (first day of crane use through completion of connections)
 - Primary crew foreman
 - Precast manufacturer, with name and telephone number of contact person who has direct knowledge of work performed
 - Controlling contractor, with name and telephone number of contact person who has direct knowledge of work performed, if appropriate.
- 6.4** The Introductory Letter could also include:
- the date(s), expected time and duration of audit activities to be conducted, including meetings with the erector's management,
 - notification that the audit will be conducted using ICT, including how the information will be accessed during the audit,
 - identification of the erector's representative for the audit,
 - any specific measures to be taken to increase the likelihood of achieving the audit objectives, and matters related to confidentiality and information security.
- 6.5** The Introductory Letter will mention that the erector must have the documents listed on the **PCI Erector Certification Program – Relevant Documents for a Company Audit** available for file-sharing, prior to conducting the remote audit, for each of their projects. After the company auditor has completed the pre-audit interviews, the auditor will notify the erector which projects have been selected to audit, then the erector can file-share the relevant documents with the auditor within the agreed to timeframe. In addition to the list of relevant documents, the erector shall also provide:
- List of current key personnel (organization chart)
 - Personnel certifications/qualifications
 - List of any special procedures that may apply to the erector (when applicable)
 - Any other erector specific document or record also required by PCI or the auditor (delete if not applicable to the specific remote audit)
- 6.6** The company auditor's selection of projects for audit is based on the information obtained during the pre-audit documentation review and pre-audit interviews and considers the erector's number of primary erection crews and any issues identified with foreman, primary crews, or projects.
- 6.7** When the company auditor notifies the erector which projects are to be audited, the company auditor and erector shall agree upon a timeframe, typically two working days, for the erector to submit the relevant documents and records for each project selected.
- a) These records must be provided to the auditor sufficiently in advance to allow review prior to the remote audit. The timeframe for their submission should be agreed upon by the auditor and erector

during the initial communication.

b) The erector is required to only submit documents associated with the projects the auditor selects.

6.8 The company auditor and erector will confirm the following items in their correspondences prior to the remote audit date:

- Remote Audit date(s) and timeframe (If the company audit date has not been confirmed yet, then the date(s) shall be decided and the timeframe which the audit will be conducted shall be agreed-upon.)
- If any additional erector or safety personnel will participate in the remote audit
- The method of ICT to be used (Provide the erector with any instructions on its use.)

7. CONDUCTING THE REMOTE AUDIT

7.1 Prior to performing the audit activities, the company auditor shall begin the remote audit by conducting the audit opening meeting. The auditor leads the meeting. The content and purpose of the opening meeting is similar to the opening meeting for a standard, onsite meeting, including:

- a) introducing the company auditor and the erector representative(s),
- b) confirming the agreement of all parties (auditee and auditor) to the audit plan, and
- c) ensuring that all planned audit activities can be performed.

7.2 Prior to starting the PCI Company Quality Audit, the company auditor will verify that all requested documents and records were provided. The company auditor will perform a full document review of the project documents by collecting and verifying information relevant to the audit objectives, scope and criteria by reviewing the erector's shared files (relevant documents and records) and by interviewing the erector's key personnel, to verify conformance with the appropriate quality standards, PCI Policy 29, and other relevant requirements.

7.3 During the audit, the company auditor will ask questions or make notes for later discussions with the erector during follow up. The company auditor will confirm that all required quality and safety and training programs are in place and check for trends or evidence to support or refute comments received in the telephone interviews.

7.4 The company auditor will record objective evidence leading to audit findings. Only information that is verifiable should be accepted as audit evidence. The audit evidence will then be evaluated against the audit criteria in order to determine the audit findings. Missing documents will be requested and should be provided prior to the closing meeting. If these documents cannot be provided immediately, the company auditor and erector should agree on an appropriate timeframe for providing this information, normally within 2 business days. Audit findings can indicate conformance or nonconformance with audit criteria, and these are to be documented. (See Company Audit Checklist Instructions and the Company Audit Checklist/Company Quality Audit Report.)

7.5 At the conclusion of the audit, the company auditor will conduct a closing meeting with the erector's designated representative(s) to present the audit findings and conclusions. Any documents to be provided at a later time should be summarized and an agreed timeframe to provide established. The scope and purpose of the closing meeting is similar to the normal, onsite meeting. Participants in the closing meeting should include appropriate erector management and, where appropriate, those responsible for the functions or processes that have been audited. The closing meeting could include the audit client (PCI) and other parties. To ensure the appropriate parties, including additional erector staff, participate in the closing meeting, the auditor may schedule the closing meeting at a later time. Whenever possible, the closing meeting should not occur later than the end of the next business day.

8. POST AUDIT ACTIVITIES

- 8.1** Following the remote audit, the company auditor will finalize the Company Audit Checklist, scoring process, and Audit Report Forms. The scoring of the audit will follow normal procedures. The audit report will be prepared and distributed according to regular procedures, with the exception of the following:
- a) the audit will be noted as a remote audit
 - b) the extent to which ICT has been used in carrying out the audit will be indicated
- 8.2** The company auditor will then follow all existing standard post audit procedures.

Appendix A – Remote Audit Introductory Letter

CCA Letterhead
(CCA Name and Address)
Month, Day, Year
Time (Time Zone)

Erection Company
Street Address
City, State, ZIP

Attn: Primary Contact

Re: PCI Certified Erector Company Audit

Dear INSERT NAME:

Thank you for your continued commitment to the PCI Erector Certification Program and maintaining compliance with the requirements of PCI Policy 29, Erector Certification Program. I have been assigned the task of conducting your annual Company Quality Audit. Your company is eligible for a remote company audit, and I will be conducting this company audit **remotely, offsite**, as opposed to the traditional onsite audit. As discussed during our call, your company has agreed to undergo a Remote Audit (on INSERT DATE and TIMEFRAME (if specified already)).

Remote Auditing Method(s): via Teleconference (Telephone or web-based) and File Share (Web-based or facsimile)

Pre-Audit Submittal

In order to prepare for the Remote Audit, I must first review the Project Information List before selecting projects to be audited. Once I select the projects to audit, I will request more relevant documents and records, further detail about this is provided below. To facilitate an effective review, **I request that the submittals are provided within the agreed-upon timeframes.** Failure to submit the relevant documents and records in a timely manner may result in postponement or failure of the Remote Audit.

Project Information List

At your earliest convenience, I request that you forward to me a Project Information List for all projects on which you erected precast concrete products since your last Company Audit. This Project Information List must be sent to me as soon as possible but no later than **fifteen (15) business days** prior to the date of the audit. At a minimum, the Project Information List must contain the following:

- Project name and location.
- Brief description of the project (such as: five-story parking garage with 200,000 SF of double tees or 78,000 SF of architectural cladding on an eight-story steel frame office building, etc.)
- Dates of erection
- Name of primary erection crew foreman
- Precast manufacturer with name and telephone number of contact person familiar with the project and your involvement
- Controlling Contractor with name and telephone number for contact person who is familiar with the project and your involvement (Note: If you were contracted by the precaster, please note that, and I will get the Controlling Contractor information from the precaster)

Prior to conducting the remote audit, I will review the project information along with the copies of the Field Quality Audit Reports and Erector Post Audit Declarations, which I have already received from PCI. I may also conduct telephone interviews with CFA's who have performed field audits of your crews and with contact persons identified on your Project Information List.

Being able to perform this activity before the date of the remote audit will help ensure that the use of our time during the audit will be efficient with minimal infringement on your normal business operations. To assist with this, I request that you have the documentation outlined on the **PCI Erector Certification Program – Relevant Documents for a Company Audit** available for file-sharing, prior to conducting the remote audit, for all the projects listed on the Project Information List. You do not have to pull these records from the files or upload them to file-share just yet.

Once I complete the pre-audit interviews, I will notify you of which projects have been selected to audit, then you can file-share the relevant documents and records with me. Please provide those documents within the timeframe agreed upon by the auditor and erector thereafter. It would be greatly appreciated if the documents were provided in the order of the checklist, as outlined in the **PCI Erector Certification Program – Relevant Documents for a Company Audit** and enumerated for ease of reference.

In addition to the documents and records listed on the Relevant Documents for a Company Audit, please provide the following documents and records:

- List of current key personnel (PM, safety manager, supervisor/foremen, etc.)
- Personnel certifications (CFA, crane operator, etc.)
- List of any special procedures that may apply to the erector (when applicable)
- Any other erector specific document or record also required by PCI or the auditor (delete if not applicable to the specific remote audit)

Your representative(s) must be prepared to teleconference at the agreed-upon time on the day of the remote audit and make available any relevant documentation, as requested.

I appreciate your attention to this matter. I assure you that I understand that you have a business to operate and through mutual cooperation, we will make sure that it is not interrupted while at the same time the audit is completed with the thoroughness it deserves.

I am enclosing the following reference document to help you prepare for the audit:

- **PCI Erector Certification Program – Relevant Documents for a Company Audit** – describes in detail what types of evidence and documentation are acceptable to fulfill the requirements of the checklist. This is a very helpful document as you prepare for the audit.

Thank you for your assistance and I look forward to meeting you “virtually”. Please contact me if you have any questions at all.

Sincerely,

CCA Name Certified Company Auditor