



July 12, 2021

MEMORANDUM FOR: REGIONAL ADMINISTRATORS
EXECUTIVE STAFF

FROM: JAMES S. FREDERICK
Acting Assistant Secretary

SUBJECT: Clarification of Policy regarding the Calibration of Equipment Used by
Outsourced Laboratories within the Nationally Recognized Testing
Laboratory (NRTL) Program

This memorandum clarifies that Annex A Section 4.6 of the NRTL Program, Policies, Procedures and Guidelines Directive CPL 01-00-004, October 1, 2019 (NRTL Program Directive or Directive) applies to the calibration of equipment used by outsourced laboratories qualified by existing NRTLs and applicant organizations. Annex A Section 4.6 contains policies for the use of calibration laboratories that are accredited for the appropriate measurement calibration of test equipment and other related policies.

Annex A Section 4.5 of the NRTL Program Directive provides that “[s]ubcontracting of testing as described in ISO/IEC 17025: 2005 Section 4.5 applies only insofar as it is incorporated by ISO/IEC 17065:2012 Section 6.2.2 and the corresponding supplemental policies in Annex B” of the Directive. Those corresponding policies, contained in Annex B Section 6.2.B of the Directive, provide, in relevant part, that “[i]f an applicant organization or NRTL accepts test data from, or witnessed testing performed at, outsourced laboratories, the applicant organization or NRTL shall ensure” that “procedures are in place to ensure the outsourced laboratory is qualified to Section 5 of ISO/IEC 17025:2005 and Annex A, Section 5 using the applicant organization’s or NRTL’s own qualification program.” The applicant organization or NRTL must also ensure that “the qualification of the outsourced laboratory for its scope of testing is verified by the applicant organization or NRTL on at least an annual basis, and when the outsourced laboratory is expanding or modifying its approved scope of testing.” Annex A Section 5.5 of the Directive contains polices to ensure that “all equipment used for testing and evaluating products is available and in proper working order for NRTL work” and includes specific policies to ensure that equipment is appropriately calibrated.

To ensure that equipment used for testing and evaluating products is available and in proper working order for NRTL work and is appropriately calibrated under the NRTL Program Directive, the equipment must be calibrated in accordance with Annex A Section 4.6. Therefore, Annex A Section 4.6 of the Directive applies to the calibration of equipment used by outsourced laboratories qualified by existing NRTLs and applicant organizations.

For questions about this clarification, and submitting applications under this revised policy, please contact Thomas Hannigan, Acting Director, Office of Technical Programs and Coordination Activities at 202-693-2110 or hannigan.thomas@dol.gov.