

	Document Title:	Doc No: <b>PRO A1-02</b>		
	<b>Opportunity for Improvement</b>	Rev No: 9	Page: 1	Of: 4
Required By:	POL A1-01			
Approval:	(On Manuals Library Copy)			

## 1.....PURPOSE

To describe the process for Keystone Certifications, Inc. (KCI) to consider and respond to complaints, relevant experiences, risks to impartiality, external & internal feedback and external & internal audit findings. Note: this procedure specifically excludes procedures for *Complaints of Certified or Approved Product Non-Conformity* and *Appeals*, these procedures are found in the applicable program documents.

## 2.....RESPONSIBILITY

The President is responsible for this procedure.

## 3.....DEFINITIONS

- 3.1.....** *Appeal*: a documented request from a KCI licensee for reconsideration of a decision made by KCI related to licensee conformance with program requirements.
- 3.2.....** *Audit Finding*: A issue documented on an audit report, discovered during an external or internal audit of KCI operations, that may be in conflict with the requirements of the Quality Policy Statement AND/OR represents an opportunity for Keystone to improve operational effectiveness.
- 3.3.....** *Complaint*: Feedback received from any interested party regarding their dissatisfaction with some aspect of Keystone operations, with the specific exception of *Complaints of Certified or Approved Product Non-conformity* and *Appeals / Disputes*.
- 3.4.....** *Complaint of Certified or Approved Product Non-conformity*: A documented notice from any interested party specifically regarding non-conformance of a licensee certified or approved product with Keystone Certification or Quality Assurance Program requirements. Procedures for resolution of these issues are specified in PRO B-10 (Fenestration, IG & Insulation programs), PRO B4-10 (StarGuard),
- 3.5.....** *Complainant*. The person or organization that originates a complaint.
- 3.6.....** *Corrective Action*: action taken by Keystone to remedy dis-satisfaction or non-conformance with the Quality Policy Statement caused by past action or inaction.
- 3.7.....** *Dispute*: (see *Appeal*).
- 3.8.....** *Feedback*: Verbal or documented communication from any interested party (licensees, employees, end-users, etc) regarding Keystone operations. May be positive or negative.
- 3.9.....** *Impartiality*: freedom from bias or prejudice, not affected by conflict of interest based on ownership, governance, financial interest, conflicting contracts or payments of commission.
- 3.10. ...** *Immediate Corrective Action*: an immediate short term response to a complaint to prevent further dissatisfaction, unrelated to improving operations and preventing recurrence in the long term, such as the delivery of an erroneous label order the customer needs corrected immediately.

	Document Title:	Doc No: <b>PRO A1-02</b>	
	<b>Opportunity for Improvement</b>	Rev No: 9	Page: 2 Of: 4
Required By:	POL A1-01		

- 3.11. ... Opportunity for Improvement:** any of the following events/issues where a KCI response represents a possible reduced risk to impartiality, an increase in the operational effectiveness, customer satisfaction, employee moral and/or conformance with the Quality Management Statement: complaints, observations, process deviations, relevant experiences, identified risks to impartiality, external & internal feedback and external & internal audit results.
- 3.12. ... Preventative Action:** action taken by Keystone to improve operational effectiveness, prevent recurrence of an action / inaction known to have caused past dis-satisfaction, correct non-conformance with the Quality Policy Statement, or alleviate risk to impartiality.
- 4.....PROCESS OVERVIEW:** This single Opportunity for Improvement process describes how Keystone responds to audit findings, complaints, relevant experiences, feedback and identified risks to impartiality.

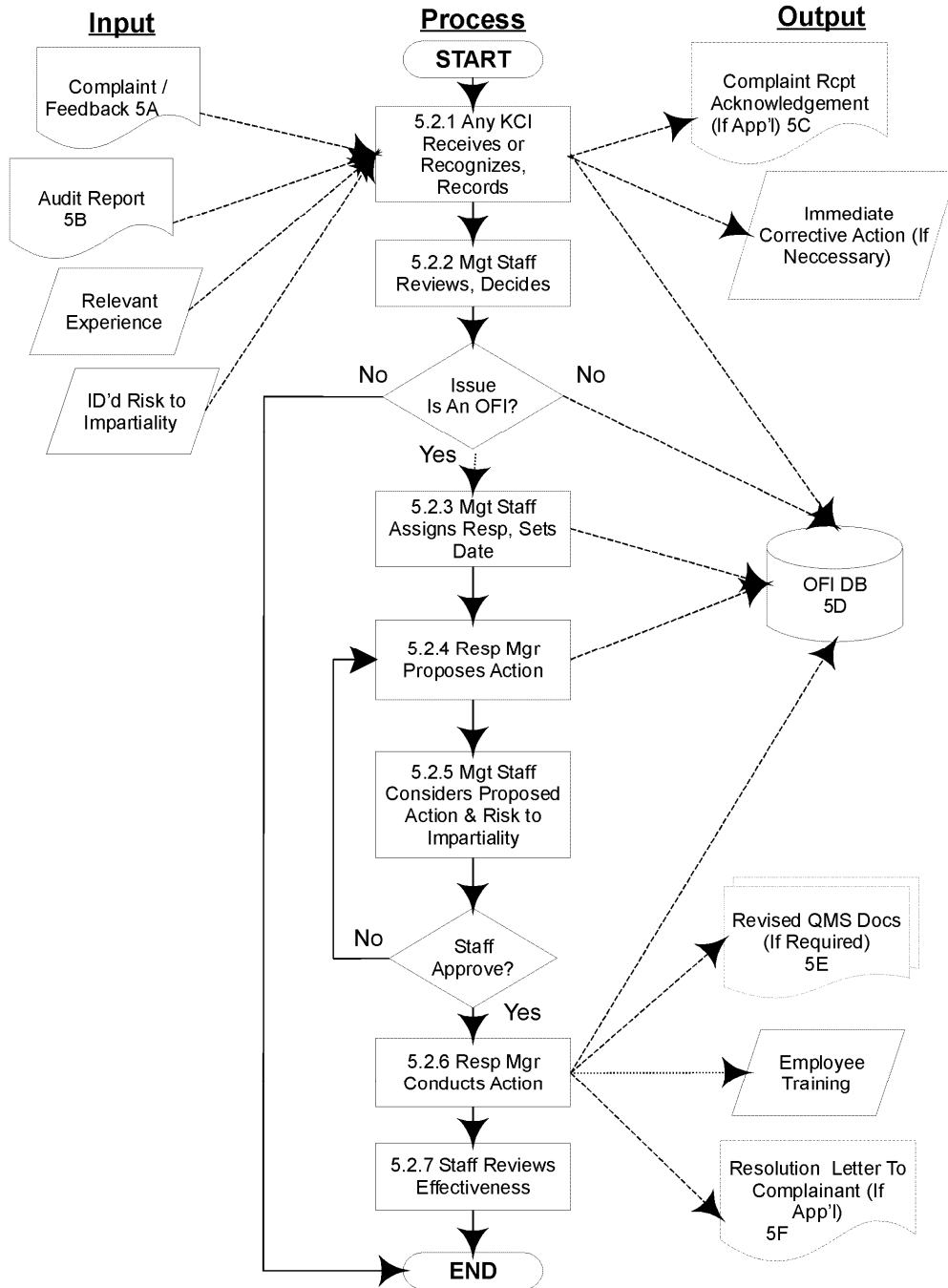
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	Document Title:	Doc No: <b>PRO A1-02</b>		
	<b>Opportunity for Improvement</b>	Rev No: 9	Page: 3	Of: 4
Required By:	POL A1-01			

**5..... Opportunity for Improvement Process**

**Caution:** This procedure should be executed as written. If circumstances require a deviation, follow PRO A3-1 (Process Deviations).

**Process Flowchart**



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	Document Title:	Doc No: <b>PRO A1-02</b>		
	<b>Opportunity for Improvement</b>	Rev No: 9	Page: 4	Of: 4
Required By:	POL A1-01			

**5.1 Process Table** (Refer to process flowchart).

Task	Remarks	Responsible
5.2.1	Any KCI employee recognizes or receives information that could represent a potential opportunity for operational improvement, such as a new idea, a complaint, an audit finding or a risk to impartiality. The KCI employee opens the OFI database and creates a new record, including a brief description of the issue and the attachment of any supporting documentation. If the issue is a customer complaint, the employee shall carefully consider if immediate corrective action may be necessary to prevent further dissatisfaction. Decisions on such action may be made by any KCI employee, however, if possible, the decision should be made with the involvement of the responsible department manager. If the item is a complaint, the employee shall acknowledge receipt via email and any immediate corrective action taken noted in the OFI database.	All Employees
5.2.2	The KCI Management Staff reviews all new OFI DB records at each monthly Quality Meeting to categorize and designate such new records as “Essential”, Substantial” or “Unjustified”.  If the record is designated Unjustified, the OFI DB record status is set to “Closed” with a brief description added to justify the decision.	Management Staff
5.2.3	If the record is designated as Essential or Substantial, Staff shall assign responsibility for resolution to a Staff member, consider a realistic timeframe for completion, and record these decisions in the OFI DB.  Note: external audit requirements may dictate timeframes.	Management Staff
5.2.4	The assigned Staff member determines & records the root cause of the issue and proposes a plan to resolve the issue in the OFI DB, including corrective & preventative action (if necessary), then notifies the other Staff members via email for review & comment.	Assigned Responsible Manager
5.2.5	The Management Staff considers the implications of the proposed corrective / preventative actions, including the assessment of risk to impartiality as specified in PRO A1-09, <i>Assessing Risk to Impartiality</i> (RTI).  Any identified risk that cannot be treated to a level acceptable to the Management Staff shall preclude the approval of the proposed corrective / preventative actions.	Management Staff
5.2.6	If the proposed corrective / preventative action is approved, the assigned Staff member executes the accepted plan of action, including any Quality Management System document revisions, employee / contractor training, and records action taken with completion dates in the OFI DB. When all actions are complete the record status is set to “Implementation Complete”. If the OFI was the result of a customer complaint, the responsible Staff member shall send an email to the complainant summarizing the resolution of the issue.	Assigned
5.2.7	Management Staff shall collectively consider the effectiveness of the action taken no less than one month and no more than six months after the action is taken. Staff may or may not then create a new related opportunity for improvement and sets the OFI record status to “Follow Up Complete” and then “Closed”.	Management Staff

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	Document Title:	Doc No: <b>PRO A1-02</b>		
	<b>Opportunity for Improvement</b>	Rev No: 9	Page: 5	Of: 4
Required By: POL A1-01				

## 5.2 Document Table (Refer to process flowchart)

Document	Title	Type	Control	Number
5A	Feedback from any interested party	Email/Letter/ Idea/Phone call	No	N/A
5B	External or Internal Audit Report	Report	No	N/A
5C	Acknowledgement of receipt of complaint	Email	No	N/A
5D	OFI Database	MS Access DB	No	N/A
5E	QMS Documentation	All	Yes	As Necessary
5F	Resolution Detail Letter	Email	No	N/A

## 6. RECORD OF REVISIONS

Rev. No.	Date of Issue	Revisions
New	11/12/01	N/A
1	3/8/07	Added applicability to KCI QA program.
2		Differentiated Complaints of Certified or Approved Product Non-conformity.
3	6/28/10	Changed Vice President to Information Manager and Validation Manager as appropriate. Changed header to current style.
4	6/14/2011	Changed to make applicable to all feedback, generalized to accept feedback in any form, changed complaint log to Improvement Opportunity log, added information on Complaint/Dispute Resolution Form
5	9/20/2013	Changed to remove Complaint/Dispute Resolution Form since Root Cause Analysis, Corrective Action and Preventive Action are in revised Complaint/Feedback Form
6	5/29/2014	Revised to include possibility of complainant going to ANSI if he/she is dissatisfied with KCI response, and revised to show correct use of log.
7	1/9/2015	Renamed procedure, revised process to include resolving risks to impartiality, added ref to OFI DB, refined process to make more comprehensive.
8	3/9/2015	Added provisions for input from interested individuals when responding to OFIs that represent risk to impartiality.
9	5/28/2015	Changed how the Mgt Staff assesses risk to impartiality, referring to new PRO A1-09.

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