Requests for an exception to the A2LA Traceability Policy can be made for Measuring and Test Equipment (M & TE) for which an acceptable accredited source of calibration is not currently available or when an acceptable accredited source of calibration is currently available but special circumstances regarding the nature of the calibration precludes the laboratory from obtaining an accredited calibration (see items E, H and I). An acceptable accredited source includes recognized National Metrology Institutes, such as NIST, and calibration laboratories accredited by A2LA or one of our mutual recognition partners. See www.A2LA.org for a listing of our partners.

A. If requesting an exception to the A2LA Traceability Policy in response to a deficiency or to prevent a deficiency from being cited prior to the occurrence of your assessment, you are required to submit the following information for each, individual case using the A2LA F907–Request for Exception to the Policy on Measurement Traceability for ISO 15189 Laboratories form.

1. Equipment name, model and calibration interval;
2. Parameter and range of calibration needed;
3. Key words used in any website search for an accredited calibration provider;
4. List of all sources investigated (e.g., specific accreditation body websites, hardcopy directories, state metrology labs, etc.)
5. A copy of the current calibration certificate.
6. Objective evidence that the measurement being provided by your present calibration vendor is traceable to the SI (a reverse traceability study verifying the sources of calibration to include a certificate of calibration showing direct calibration by an NMI or by an A2LA recognized accredited laboratory). A traceability statement found on the calibration certificate is not adequate objective evidence.

In cases where the calibration interval of the reference standard or measuring and test equipment is set at greater than two years, and it exceeds the manufacturer’s recommended interval, documented evidence (e.g. records of intermediate checks) indicating that the reference standard or measuring and test equipment continues to remain within the manufacturer (or applicable) specifications is also required.

B. If an exception is granted, you will be notified in writing, however the exception will only be granted for the current calibration interval. Circumstances surrounding the exception will be re-evaluated during your next full assessment. A deficiency will again be cited if a new calibration interval was assigned to the reference standard or measuring and test equipment; the calibration provider does not meet the P905 - A2LA Metrological Traceability Policy for ISO 15189 Laboratory Testing, and you did not receive a further exception approval.

Note: when the calibration interval is set at less than two years a further exception approval is not required by A2LA until the renewal application is made available to the laboratory.

C. In cases where an accredited laboratory capable of providing traceable calibration service is currently available then the laboratory is required to use that provider per P905 - A2LA Metrological Traceability Policy for ISO 15189 Laboratory Testing and the request for an exception to P905 will be denied.
D. In cases where a complete reverse traceability study is not provided the request for an exception to P905 is normally denied. A2LA may decide, on a case-by-case basis, to postpone a decision in order to request additional information.

E. In cases where use of an accredited laboratory will violate the equipment warranty from the Original Equipment Manufacturer (OEM), or the use of OEM proprietary software is necessary for the performance of the calibration, an exception to P905 will be considered as long as a complete reverse traceability study is provided. Evidence of the warranty and/or required use of OEM proprietary software is required for consideration of the request.

F. In cases where the same traceability path applies for more than one piece of equipment a single request can be made as long as each piece of equipment is uniquely identified in the request.

G. In cases where the laboratory, in an attempt to gather the necessary documents to submit a request, has contacted a calibration provider and that provider proves to be uncooperative, the laboratory may contact A2LA for assistance. Submission of objective evidence of attempted communication between your laboratory and the calibration provider and lack of responsiveness on the part of the calibration provider will be needed before assistance can be afforded.

H. In cases where the laboratory is required to use a State Weights and Measures facility for the calibration of their weights, if the facility is not accredited by a recognized accrediting body but does participate in the NIST State Laboratory Measurement Assurance Program, the state facility’s current certificate of measurement traceability is sufficient traceability and a request is not required. If the state does not have a certificate of measurement traceability then an exception request is required.

Please see http://www.nist.gov/pml/wmd/labmetrology/lab-contacts-ac.cfm for a copy of current certificates.

I. In the case of a reference material please see P905 - A2LA Metrological Traceability Policy for ISO 15189 Laboratory Testing, section M2 (D). When an accredited reference material is not available an exception request is not required.

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