1.0 PURPOSE AND SCOPE

1.1 Purpose
1.1.1 To define the methods for preventive action, nonconformance trend identification, customer complaints/concerns and the issue of corrective action measures to ensure effective and timely solutions are taken to address root causes of problems.

1.2 Scope
The scope of this procedure is applicable to all customer orders, suppliers and our Company business processes.

2.0 APPLICABLE DOCUMENTS
The following documents of the latest issue are applicable to the extent specified herein:

Commercial/Industrial/Government Documents
ISO 9001:2008 Quality Management System Requirements

Internal Document(s)
ATS-QAP-1004 Quality Records
ATS-QAP-1005 Nonconforming Material System
ATS-QAP-1007 Customer Concerns/Complaints
ATS-QAP-1008 Internal Audits
ATS-QAP-1009 Management Review

Form(s)
FORM 1201 Corrective Action Request
FORM 1069 Defect Report - Material
3.0 RESPONSIBILITIES

3.1 General

3.1.1 Quality Assurance - shall be responsible as follows:
   a. Quality Assurance has the responsibility for the implementation and maintenance of this procedure.
   b. Quality Assurance shall be responsible for initiating and tracking Internal Corrective Action Measurement as described in this procedure.
   c. Quality Assurance shall have the responsibility for maintaining the status of, internal request for Corrective Action, or improvement.

3.1.2 Sales/Business Operations/Quality Assurance - shall be responsible as follows:
   a. Sales/Business Operations/Quality Assurance shall be responsible for coordinating and preparing a response to all Customer (external) concerns or corrective actions. The Sales and Business Operations Departments are primary interfaces.

3.1.3 Purchasing/Quality Assurance - shall be responsible as follows:
   a. Purchasing/Quality Assurance shall be responsible for sending and receiving SCAR forms from the Supplier in a timely manner.

3.2 Definitions

3.2.1 On-The Spot Corrective Action - is verbal corrective action initiated by QA Personnel and utilized to correct a nonconformance which is considered minor and non-reoccurring.
   If non-product oriented non-conformances are detected during an audit, the On-the-Spot Corrective Action shall be documented on the audit record form defined in ATS-QAP-1008, Internal Audits.

3.2.2 Formal Corrective Action - is a documented request, initiated by Quality Assurance (Internal and Suppliers) or Customers (External), which requires the responsible supplier or our Company department to state in writing the root cause of the nonconformance, the action taken to eliminate the cause of the nonconformance and the date when the corrective action will take effect.
4.0 GENERAL REQUIREMENTS

4.1 General
4.1.1 The corrective action(s) system defined in this document starts with preventive action as a means of getting work accomplished. Preventive actions are initially applied during the planning of each Customer order and the design of new business processes. The intent is to focus on root causes of probable problems/concerns and implement solutions that prevent the problems/concerns from occurring. This document includes the following topics:
   a. Preventive Actions
   b. Nonconformance Data
   c. Corrective Actions
   d. Customer Complaints/Concerns
   e. Management Review

4.2 Preventive Action
4.2.1 Quality Assurance/Business Operations determine actions needed to eliminate the causes of potential nonconformities in order to prevent their occurrence. Preventive actions taken are appropriate to the effects of the potential problems.

4.2.2 Preventive Actions are steps taken to prevent nonconformances from occurring versus re-acting to nonconformances.

4.2.3 Typical preventive actions include:
   a. Reviewing Customer orders to ensure requirements are clearly defined
   b. Examining prior process defect data (i.e. test/inspection yields and defect trends, etc.) before setting up processes for new products
   c. Designing new processes in a manner that are mistake proof
   d. Reviewing design documentation to ensure the information is accurate, complete and clear
   e. Providing adequate time (i.e. scheduling) for processing products
   f. Conduct hands-on training and providing proper communication to personnel involved in product quality
   g. Ensuring proper tools/equipment and work environment are available to perform work activities
   h. Preparing work instructions, as necessary, to clarify un-clear information
   i. Preparing sample products and conducting first article inspections as necessary, and
   j. Other
4.3.1 Nonconformance (NC) Data
4.3.1.1 NCs relating to materials, procedures, supplies, audits, and all other areas which affect product quality are documented, maintained and analyzed by QA. The means for documenting test/inspection results and non-conformances is defined in ATS-QAP-1005, Nonconforming Material System. Audit non-conformances are documented per ATS-QAP-1008, Internal Audits.

4.3.1.2 The nonconformance data is used to either effect corrective action for individual causes of NC’s or causes of NC trends identified through the use of collective analysis techniques. Quality Assurance analyzes nonconformance data at intervals appropriate for the work being performed. As a minimum, the review is conducted twice per year (typically every six months) as defined in ATS-QAP-1009, Management Review.

4.4 Corrective Actions
4.4.1 The corrective action forms used to identify issues requiring action are defined in this section and are prepared, approved and issued by Quality Assurance.

4.4.2 Corrective Action Forms and Instructions
a. Requirements and instruction for filling out the Corrective Action Request (CAR) or Supplier Corrective Action Request (SCAR) forms are defined on the form. Prior to CARs being issued, Quality Assurance shall review, approve and date the form prior to distribution.

b. All initial and completed Corrective Action forms are retained electronically in the Lotus Approach database retained in the Quality Assurance area.

c. When a Supplier Corrective Action Request is issued for a Supplier/Vendor deficiency, the request will describe the specific details of the deficiency(s) per Drawing, P.O. or other requirement. Quality Assurance personnel issuing SCARs to a Supplier shall forward the completed SCAR form to the responsible Purchasing for distribution to the Supplier.

d. Purchasing personnel responsible for the distribution of the Supplier SCAR forms to Suppliers shall ensure the distribution occurs as soon as possible. When there is a reason for not distributing the SCAR form on time, Quality Assurance shall be informed in writing stating the reason.
4.4.3 Request for Corrective Action
4.4.3.1 Corrective Action Request (CAR)
4.4.3.1.1 A CAR form is issued for repetitive ongoing problems and issues having a major impact on Customer end item delivery, and quality management system noncompliances.

4.4.3.2 Supplier Corrective Action Request (Supplier CAR)
4.4.3.2.1 A SCAR form is issued to Supplier/Vendor for repetitive ongoing problems and issues having a major impact on Customer end item delivery. Supplier SCARs may also be used to obtain failure analysis information from Suppliers to support Engineering analysis reports.

4.4.4 Response Time
a. The maximum response time shall be seven (7) working days for CARs, (30) thirty working days for Supplier SCARs. The response time on Supplier SCARs or CARs can be extended by Quality Assurance as required. All requests for extent the due date shall in writing and submitted to QA for approval.

b. CARs and Supplier SCARs that are overdue shall be followed up with a written overdue notice from the initiator to the recipient. Supplier SCARs that are overdue shall be followed up with a written overdue notice from Supplier Quality Assurance to Purchasing. If the overdue response is not within the allotted period of time - the seven (7) working days for CARs, and thirty (30) working days for Supplier SCARs, then the CAR/SCAR shall be forwarded to the Quality Council for resolution. These CARs/SCARs shall remain open until the initiator/Quality Assurance is notified by the Quality Council, via the minutes of the Quality Council meeting, that the problem has been resolved.

c. All requests for extending due dates shall be in writing to Quality Assurance. Quality Assurance will review each request, and approve or disapprove the extension based on the circumstances.

4.4.5 Closing of CARs, and Supplier CARs
4.4.5.1 CARs and Supplier CARs that have received a satisfactory response shall remain open until QA has verified the implementation and effectiveness of the Corrective Action.

4.5 Customer (External) Concerns/Complaints
4.5.1 The Business Operations/Quality Assurance Department shall be responsible for tracking all Customer Concerns/Complaints or Corrective Action Requests in accordance with ATS-QAP-1007, Customer Concerns/Complaints.
4.6 Management Review

4.6.1 Management Reviews include the review of nonconformance and corrective action data as submitted by Quality Assurance. This includes the review of Customer Concerns/Complaints. During the Management Review, all delinquent corrective action(s) are examined and action taken to closure the issue(s) in a timely manner. See ATS-QAP-1009, Management Review.