

DOCKETED

Docket Number:	13-ATTCP-01
Project Title:	Acceptance and Training Certification
TN #:	240939
Document Title:	NLCAA 2019 Application - Amendment #1
Description:	N/A
Filer:	Brianna Kadar
Organization:	National Lighting Contractors Associaton of Amercia (NLCAA)
Submitter Role:	Applicant
Submission Date:	12/15/2021 10:23:59 AM
Docketed Date:	12/15/2021



Amendment #1

Due to continuing scheduling conflicts, the unforeseen circumstances created by COVID-19, and ongoing concerns of NLCAA's Field Inspection process, NLCAA is requesting the addition of a Field Audit Process.

NLCAA is requesting to utilize this new Field Audit process for past due Field Inspections that have not been able to be completed.

Revision to "NLCAA Application to the CEC - Rev 05 - 5/01/19"

- Page 16-17
- Attachment 4 – Page 1-2
- NLCAA Appendix 2 - Page 1 of 2
- Appendix 3 - Page 1 of 1



Edited Application:

"NLCAA Application to the CEC Rev 05 5/01/19" - Page 16-17

Quality Assurance and Accountability

...

Compliance process evaluation by NLCAA shall take the form of a Desk Audit, Field Audit, or a Field Inspection.

The Desk Audit process allows NLCAA directors or their agents to review Acceptance testing forms for signs of "irregularities" or "inconsistencies" as determined by NLCAA directors or their agents.

Desk Audits allow comparisons between Audit Forms submitted for a job and Acceptance testing forms submitted for the same job.

The Desk Audits are done at project level and will cover the compliance form requirements of the code.

A "Field Inspection" is a "(visit) to (a) building site where certified technicians are completing acceptance tests, § 10-103.1 (c) 3. F. This site visit shall be arranged by an Acceptance Test Technician Employer for the Field technician under inspection. This "Field Inspection" should occur on the next possible occasion after the Employer has been notified by telecommunications. A Field Inspection will consist of a minimum 2-hour site visit during which the Field Technician performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. In addition: any or all of the following may occur; verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the Acceptance Test Technician(s) performing acceptance tests.

A Field Audit consists of a building site visit during which an NLCAA approved inspector compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests. The NLCAA approved inspector will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.

...



Oversight Procedures

Per our CEC application to become an approved ATTCP, NLCAA oversees the ATEs and ATTs in ~~two~~ three ways. ~~There~~ These are Desk Audits, Field Audits, and Field Inspections.

...

Field Inspections:

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

This Field Inspection should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Inspection is required. The ATE is encouraged, but not required, to be onsite during the Field Inspection.

The NLCAA approved inspector will have a Field Inspection checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

"At NLCAA we use the Field Inspections as a mentoring tool. NLCAA strives to continue teaching in any way we can. While the representative is in the field with the ATT, it is NLCAA's goal to not only complete the required Field Inspection, but to also find ways of helping and improving the ATT's testing capabilities whether they are just starting out or are seasoned testers."

- Michael Scalzo, Executive Director

Field Inspection Process:

Field Inspections will be required as determined by NLCAA.

A Field Inspection can be conducted in lieu of a Field Audit and/or as a disciplinary action from a failed Oversight process.

Field Inspections may also be completed upon request of an ATT and/or ATE who would like guidance during the Acceptance Testing process.

Field Audits:

A Field Audit consists of a building site visit during which an NLCAA approved inspector compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls



not sampled by the ATT performing acceptance tests.

This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.

The NLCAA approved inspector will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

Field Inspection Audit Process:

NLCAA or their agents will require a Field ~~Inspection~~ Audit to be conducted according to the following schedule:

- ATT's 2nd to 5th project after certification.
- A random sample of no less than 1% of each ATT's completed projects. *
- ATT's 1st to ~~254th~~ job after recertification (not to be the same project as a Desk Audit).

*The Random Sample will be conducted using the Pseudo Random Number Generator (PRNG)
Pseudo Random Number Generator (PRNG) refers to an algorithm that uses mathematical formulas to produce sequences of random numbers. PRNGs generate a sequence of numbers approximating the properties of random numbers.

Step 1: ATT hits the trigger to initiate a Field ~~Inspection~~ Audit per the Oversight Procedures.

Step 2: NLCAA or its agent notifies the ATE and/or ATT that a Field ~~Inspection~~ Audit is required ~~to be scheduled on the next possible on a completed~~ project.

Step 3: The ATT and/or ATE must ~~schedule the Field Inspection~~ and pay applicable fees to NLCAA.

Step 4: Approved NLCAA inspector conducts the Field ~~Inspection~~ Audit ~~with the ATT~~ (the ATE and ATT ~~are~~ is encouraged but not required, to be onsite during Inspection). The inspector completes the Field ~~Inspection~~ Audit checklist and submits it to the NLCAA database.

If the results are deemed unsatisfactory by the Inspector, the Checklist will be reviewed by the NLCAA Executive Director for further actions.

Step 5: The ATT and/or ATE will be notified of the ~~Inspection~~ Audit results within twenty days after completion.

If the results are deemed unsatisfactory by the Executive Director, a second Field Audit, a Field Inspection or Complaint Procedure may be required with applicable fees.

Step 6: If, after a secondary Field Audit or Inspection is conducted, the results are still unsatisfactory, the NLCAA inspector and/or Executive Director will initiate the Complaint Procedure with applicable fees.



Definitions

...

Field Inspection

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

Field Audit

A Field Audit consists of a building site visit during which an NLCAA approved inspector compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

...

NLCAA FEE SCHEDULE

...

The charge for a Field Inspection is: \$500

The charge for a Field Audit is: \$500

...



Updated Application:

"NLCAA Application to the CEC Rev 05 5/01/19" - Page 16-17

Quality Assurance and Accountability

...

Compliance process evaluation by NLCAA shall take the form of a Desk Audit, Field Audit, or a Field Inspection.

The Desk Audit process allows NLCAA directors or their agents to review Acceptance testing forms for signs of "irregularities" or "inconsistencies" as determined by NLCAA directors or their agents.

Desk Audits allow comparisons between Audit Forms submitted for a job and Acceptance testing forms submitted for the same job.

The Desk Audits are done at project level and will cover the compliance form requirements of the code.

A "Field Inspection" is a "(visit) to (a) building site where certified technicians are completing acceptance tests, § 10-103.1 (c) 3. F. This site visit shall be arranged by an Acceptance Test Technician Employer for the Field technician under inspection. This "Field Inspection" should occur on the next possible occasion after the Employer has been notified by telecommunications. A Field Inspection will consist of a minimum 2-hour site visit during which the Field Technician performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. In addition: any or all of the following may occur; verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the Acceptance Test Technician(s) performing acceptance tests.

A Field Audit consists of a building site visit during which an NLCAA approved inspector compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests. The NLCAA approved inspector will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.

...



Oversight Procedures

Per our CEC application to become an approved ATTCP, NLCAA oversees the ATEs and ATTs in three ways. These are Desk Audits, Field Audits, and Field Inspections.

...

Field Inspections:

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

This Field Inspection should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Inspection is required. The ATE is encouraged, but not required, to be onsite during the Field Inspection.

The NLCAA approved inspector will have a Field Inspection checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

“At NLCAA we use the Field Inspections as a mentoring tool. NLCAA strives to continue teaching in any way we can. While the representative is in the field with the ATT, it is NLCAA’s goal to not only complete the required Field Inspection, but to also find ways of helping and improving the ATT’s testing capabilities whether they are just starting out or are seasoned testers.”

- Michael Scalzo, Executive Director

Field Inspection Process:

Field Inspections will be required as determined by NLCAA.

A Field Inspection can be conducted in lieu of a Field Audit and/or as a disciplinary action from a failed Oversight process.

Field Inspections may also be completed upon request of an ATT and/or ATE who would like guidance during the Acceptance Testing process.

Field Audits:

A Field Audit consists of a building site visit during which an NLCAA approved inspector compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.



This Field Audit should occur on the next possible occasion after the ATE and/or ATT have been notified that a Field Audit is required. The ATE and ATT are encouraged, but not required, to be onsite during the Field Audit.

The NLCAA approved inspector will have a Field Audit checklist to document what Acceptance Tests were performed and if the ATT accurately performed the testing procedures.

Field Audit Process:

NLCAA or their agents will require a Field Audit to be conducted according to the following schedule:

- ATT's 2nd to 5th project after certification.
- A random sample of no less than 1% of each ATT's completed projects. *
- ATT's 1st to 4th job after recertification (not to be the same project as a Desk Audit).

*The Random Sample will be conducted using the Pseudo Random Number Generator (PRNG)
Pseudo Random Number Generator (PRNG) refers to an algorithm that uses mathematical formulas to produce sequences of random numbers. PRNGs generate a sequence of numbers approximating the properties of random numbers.

- Step 1: ATT hits the trigger to initiate a Field Audit per the Oversight Procedures.
- Step 2: NLCAA or its agent notifies the ATE and/or ATT that a Field Audit is required on a completed project.
- Step 3: The ATT and/or ATE must pay applicable fees to NLCAA.
- Step 4: Approved NLCAA inspector conducts the Field Audit (the ATE and ATT are encouraged but not required, to be onsite during Inspection). The inspector completes the Field Audit checklist and submits it to the NLCAA database.
- If the results are deemed unsatisfactory by the Inspector, the Checklist will be reviewed by the NLCAA Executive Director for further actions.
- Step 5: The ATT and/or ATE will be notified of the Audit results within twenty days after completion.
- If the results are deemed unsatisfactory by the Executive Director, a second Field Audit, a Field Inspection or Complaint Procedure may be required with applicable fees.
- Step 6: If, after a secondary Field Audit or Inspection is conducted, the results are still unsatisfactory, the NLCAA inspector and/or Executive Director will initiate the Complaint Procedure with applicable fees.



"NLCAA Application to the CEC Rev 05 5/01/19" - NLCAA Appendix 2 - Page 1 of 2

Definitions

...

Field Inspection

A Field Inspection consists of a minimum 2-hour building site visit during which the ATT performing acceptance testing will be observed and interviewed by an approved NLCAA inspector. The Field Inspection may include, but not be limited to, any of the following: verification of acceptance tests completed, observation of acceptance testing methods, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

Field Audit

A Field Audit consists of a building site visit during which an NLCAA approved inspector compares the documentation results submitted by the Acceptance Test Technician to the on-site, real-world results. The Field Audit may include, but not limited to, any of the following: verification of acceptance tests completed, testing of lighting controls by NLCAA or their agent(s), testing of additional lighting controls not sampled by the ATT performing acceptance tests.

...

"NLCAA Application to the CEC - Rev 05 - 5/01/19" - Appendix 3 - Page 1 of 1

NLCAA FEE SCHEDULE

...

The charge for a Field Inspection is: \$500

The charge for a Field Audit is: \$500

...