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9117 Delegated Product Release Verification

Frequently Asked Questions

1. Delegated Product Release Verification Background

1.1. What is the purpose and what are the benefits of DPRV? (1.1)

DPRV applies when a Delegating Organization (customer) seeks to delegate product release to a supplier. It is intended that this will assist in the reduction of escapes and increase product integrity throughout the supply chain. It is recommended to be flowed down to the lowest supply chain level where applied.

1.2. How do I participate in the program? (1.1)

For Delegating Organizations, it is an optional standard that can be strategically deployed at any time. Supplier participation will be initiated by the Delegating Organization through contractual flow-down. The supplier may also request participation by contacting the Delegating Organization.

1.3. Do I have to flow down DPRV to my suppliers?

It is recommended to do so, but the Delegating Organization may mandate that this is flowed down, thus affording the opportunity to cascade the participation throughout the supply chain.

1.4. What is the difference between Source Inspection and DPRV? (3.1)

Source Inspection is the attendance of the customer or their contracted 3rd party, at the premises of the supplier to conduct product release. DPRV is when this activity (or parts thereof), has been delegated to a supplier.

2. Delegating Organization – Develop DPRV requirements

2.1. Can I use existing processes? (4.1.1)

Yes, if they meet the requirements of the standard and agreed to by the Delegating Organization.

2.2. Why do limitations exist? (4.1.3)

Limitations are needed to address where specific regulators may not allow/recognize DPRV. In addition limitations may be imposed at a commodity or part level, eg, critical parts. Any limitations will be defined in the scope of DPRV.

2.3. What constitutes documented authorization? (4.1.2b)

Dependent on the requirements of the Delegating Organization, this could be defined in a formal letter, approval certificate, purchase order note, contract amendment, etc.

2.4. What is meant by change notification requirements? (4.1.4)

The Delegating Organization will identify the process for change notification, which could include change of key personnel, change of sub-tier, work transfers, etc. It is the supplier's responsibility to immediately notify the Delegating Organization upon any changes required.

2.5. As part of the maintenance program, what is meant by periodic inspection and product validation? (4.1.5)

The Delegating Organisation shall conduct a physical inspection of the product based upon risk factors associated with the product. This may be part of receiving inspection or on-site review and may be carried out by a 3rd party operating on behalf of the Delegating Organization. This activity will be conducted at a documented frequency as defined by the Delegating Organization, e.g. annually, quarterly, etc.

3. Delegating Organization – Identification of candidate supplier

3.1. What type of suppliers could be a candidate for DPRV? (4.1.2)

A candidate for DPRV could be any supplier providing products to the delegating organization, subject to limitations in place.

3.2. How long does supplier have to be on our ASL before eligible?

There is no requirement or time frame mandated, but the Delegating Organization should consider volumes, quality performance history, etc.

3.3. What criteria do I consider to determine supplier selection for DPRV? (4.1.2c)

The Delegating Organization will identify what they consider to be key elements for supplier participation in the DPRV program. Criteria should include, but not be limited to:

- Supplier performance
- Acceptance rate
- Product criticality
- Corrective action responsiveness
- Risk to program
- Customer requirements

3.4. Can the supplier use a third party to perform the DPRV?

Yes, but the relationship needs to be documented in the supplier Quality Management System, communicated with the Delegating Organization and be compliant with all of the requirements stipulated in the DPRV process.

3.5. Does DPRV apply for parts/product received with an Approved Release Certificate (FAA 8130-3 or EASA Form 1 or CAA Form 1 or recognised equivalent) (4.1.3)

Yes, if required by the Delegating Organization. There are some limited circumstances under, for example, Direct Delivery or Direct Ship scenarios where source acceptance (DPRV) applies in addition to regulatory certification.

4. Supplier Process/Training

4.1. Are there outside sources that can conduct DPRV training?

DPRV training will be conducted by the Delegating Organization or through the use of a 3rd party as approved by the Delegating Organization.

AESQ (Aero Engine Supplier Quality) sponsors SAE C1501 Common Training for DPRV Personnel

https://www.sae.org/learn/content/c1501/

4.2. Do I need separate approvals for each delegating organization? (4.1.2a) (4.1.3)

Yes, each Delegating Organization needs to control delegations under their own Quality Management System. However, Delegating Organizations may reflect the attainment of DPRV from other Delegating Organizations as a basis for initial approval.

4.3. Do DPRV personnel require re-approval when they change employers? (4.1.1) (4.3)

Yes, DPRV personnel are acting under a new Delegating Organization approval when changing employer.

4.4. What qualification do my employees require? (4.3)

Minimum qualifications are identified within the DPRV process such as eye exams, and product knowledge. Other qualifications may be mandated by the delegating organization.

4.5. What training topics need to be addressed? (4.3.2) (4.2.4) (4.3.4)

Initial and recurrent training will typically include but not limited to the following, noting that there may be additional training specified / required by the delegating organization:

- DPRV Responsibility, Accountability, Authority
- The role of the product release delegate
- Records Falsification
- Product Substitution
- Product Integrity and applicable airworthiness standards
- Flight safety / Safety critical components
- Foreign Object Damage (FOD)
- Human Factors
- Packaging/Preservation
- Part identification – Marking
- Contract Review & flow-down of requirements
- Non-conformance Management
- Configuration Control

- First Article Inspection (FAI) awareness
- Product Realization, e.g. router completion
- Sub-tier Management
- Visual Inspection
- Counterfeit parts prevention
- Shipping/required documentation
- Customer specific requirements[1]

4.6. What are DPRV eye exam requirements? (4.3.3)

The DPRV personnel shall have a periodic eye vision assessment to a recognized standard, such as Jaeger, Snellen, Curpax, Ishihara PIP, Richmond etc., unless waived by the delegating organization. Vision assessments should also consist of a color perception test and visual acuity appropriate for the product or commodity being released. Vision assessment should be carried out by trained/qualified personnel.

4.7. Does DPRV specify unique inspection requirements and what characteristics need to be checked? (4.4.2)

DPRV does not specify unique inspection requirements, as these are defined by the component definition. Characteristics to be verified maybe mandated or specified by the Delegating Organization.

4.8. Does DPRV cover packaging?

Not typically. Dependent upon packaging type it may not be possible to verify specific items or requirements. DPRV is focused on the product. The Delegating Organization may place packaging as an additional requirement.

5. Approval by Delegating Organization and Supplier Acceptance

5.1. What controls does the Delegating Organization need to have in place?

The organisation needs to have documented evidence of planning, deployment, controls and measurement of the DPRV process and the suppliers and products that are subject to it.

Specifically Controls need to ensure the visibility of the supply base delegation status, such as periodic review, periodic inspection/validation of product received, and review of the DPRV process. Based on the results of the review, the Delegating Organization shall have controls to address deficiencies.

5.2. Does the Delegating Organization need to audit candidate suppliers?

An onsite review is recommended, however, there is no specific requirement to audit candidate suppliers. The DO should consider the following elements:

- Product criticality
- Commodity

- Supplier performance
- Product/Process conformance
- Corrective action response

5.3. Can a Suppliers' DPRV approval be maintained when a work transfer or movement occurs?

If the work transfer does not impact the DPRV process then no action is required. For example, transfer occurring within the same facility with no change to personnel, processes and so on should not affect the DPRV process.

However, if the nature of the work transfer affects the DPRV process then the Delegating Organization should be notified. For example, moving a process or product line to a different factory location or sub-contracting the customer purchased part number would in all likelihood change approved personnel, introduce QMS changes, ownership and so on. In such event approvals need to be reviewed for effectivity and amendment.

For free guidance on how to successfully manage a work transfer or work movement a good source of material is the Supply Chain Management Handbook (SCMH) available via the IAQG website.

5.4. What constitutes Supplier acknowledgement?

Typical acknowledgement will be in written form from the Supplier, e.g. letter, acknowledgement of Purchase Order, Memorandum of Understanding, or amendment to a particular contract clause etc.

5.5. Does Supplier DPRV approval cover multi-sites?

It is possible that a multi-site approval can be granted, but this will be dependent upon the Delegating Organization granting such an approval.

6. Deployment

6.1. Can DPRV be used on product without a First Article Inspection in place?

Typically not, but where the FAI process does not apply (such as in the case of aerospace standard fasteners or COTS type items) then DPRV process can still be called out as a requirement by the Delegating Organization.

For further guidance on items eligible for Aerospace First Article Inspection refer to AS9102.

6.2. Can DPRV be used with open non-conformances?

If the Delegating Organization authorizes the shipment of a product with open non-conformance, then this process may be used. The Delegating Organization should authorize this in writing.

6.3. What is meant by independent process? (4.4.1)

The DPRV process occurs after all inspection activities have been completed and accepted. It is therefore carried out by personnel independent of final inspection.

However, it is recognised that this may be unachievable for very small organisations and needs to be acknowledged and documented between the delegating organisation and the supplier.

6.4. What elements should be addressed during re-qualification training? (4.3.4) (4.5)

Re-qualification would typically cover the same elements which were reviewed during initial training, but may be a different level of detail. It is also important to include any new or amended criteria from the DPRV process and procedures and any new or amended part numbers, changes etc etc. See section 4.5 above.

6.5. What constitutes periodic re-qualification? (4.3.4)

The supplier should define the frequency for on-going re-qualification, and this may require approval by the Delegating Organization. This frequency may be annually, 2-yearly, etc. The frequency employed may be standard for all DPRV personnel, but the use of performance-based data to set a frequency may also be used. Additional guidance can be found in AS13001 (DPRV Training Requirements)

6.6. How many DPRV personnel is considered suitable?

There is no criteria for establishing the number of DPRV personnel. Consideration should be made to volume of product and customer needs to ensure neither delivery schedules nor quality is compromised, typically for holidays, natural absences and so on. However, a minimum of 2 people is recommended even for small enterprises.

7. Oversight/Maintenance

7.1. Does the Delegating Organization have to audit the supplier, the approved personnel or the process?

The Delegating Organization should procedurally define the method of periodic review. This periodic review should assess DPRV performance. Additionally, the supplier should periodically assess the DPRV process.

7.2. As a certified DPRV, do I need to notify Delegating Organization when I find errors and/or unethical activities occur, and if so, how?

Yes, however consideration should be given to the nature of the errors identified prior to notifying the Delegating Organization. Note: All unethical behavior should be reported in accordance with company establish policies. The method of reporting should be discussed with the Delegating Organization.

7.3. Can supplier internal audits of DPRV process be considered to satisfy the Delegating Organization audit requirements?

Typically not, as the Delegating Organization will conduct its own oversight process.