



Body Armor Compliance Testing Program

NIJ

A program of the National Institute of Justice

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ADMINISTRATIVE CLARIFICATION CTP 2013:01

Topic: Manufacturing Locations and Use of Subcontracted Manufacturers

Purpose

As the ballistic body armor industry has evolved, the organizations applying for participation in the NIJ Body Armor Compliance Testing Program (CTP) have also evolved. This includes the internal structure of those organizations.

The purpose of this document is to clarify the CTP's position concerning an applicant's responsibility when that applicant engages in the subcontracting of manufacturing facilities.

For the purposes of this clarification, the following definitions apply:

Applicant: Organization or person responsible to a certification body for ensuring that certification requirements, including product requirements, are fulfilled. *Note:* Adapted from ISO/IEC 17065, definition 3.1 (Client)

Certification body (CB): Third-party conformity assessment body operating certification schemes (ISO/IEC 17065, 3.12).

Manufacturing location: Facility where the materials listed on the CTP Build Sheet are assembled and sealed (in the manner also described on the CTP Build Sheet).

Clarification

Applicants have always been required to notify the CTP of all active manufacturing locations where NIJ-complaint body armor is being assembled. This includes both locations operated by the applicant and locations operated by a subcontractor.

All manufacturing locations also continue to be subject to surveillance by the CTP's Follow-up Inspection and Testing program. This includes initial product inspections whenever a manufacturing location begins production of a model.

When an applicant applies to participate in the CTP, an officer or representative of the applicant who has the authority to bind it signs agreements related to the applicant's obligations.

The CTP, in its role as a certification body, shall hold the applicant fully responsible for enforcing compliance with these agreements by all employees and subcontractors involved in the manufacture of the applicant's listed body armor model(s) at all locations.

This includes (but is not limited to) responsibility for all locations regarding:

- Adherence to the applicable construction and assembly described in current documents provided to the CTP by the applicant.
- The compliance of model(s) with program requirements including onsite access to manufacturing locations for surveillance purposes.
- Following the manufacturing processes used for samples provided for initial determination testing (this includes quality assurance and applicable verification of purchased materials).
- Maintaining records associated with quality and tracking of individual armors.
- Notifications of end users.
- Recalls when necessary.

Failure of the applicant (including employees and/or subcontractors) to abide by the requirements of the CTP could have a negative impact on the applicant's continued participation in the CTP. This could result in the removal of **all** applicant models from the compliant product list and the issuance of NIJ Notifications. This may include all brand name(s), trademark(s) and manufacturing locations associated with the applicant's models.