CRP Third-Party Test Lab Program Requirements

NMEDA's third-party test lab program is an opportunity for test labs to become NMEDA approved to perform compliance review for regulated accessible vehicle conversions and adaptive mobility equipment

All approved test labs shall adhere to these requirements and those referenced from ISO 17025:

A. Quality System/Accreditation

The test lab shall have a formal documented quality system in place. The preferred accreditation is to the ISO 17025 standard, however, NMEDA will accept test labs accredited to ISO 9001 so long as the lab can demonstrate their processes meet all the requirements of ISO 17025 as called out in this document.

B. Capabilities

The test lab shall provide NMEDA with a current list of standards that they are accredited to test. NMEDA shall be notified of any changes within 10 business days.

C. Subcontracting of Tests

NMEDA does not permit the subcontracting of tests to other parties without prior written approval from NMEDA.

D. Corrective Action

The test lab must have procedures in place to implement corrective actions when nonconforming testing, nonconforming calibrations or departures from the lab's quality system policies and procedures are discovered. These corrective action procedures are to include root cause analysis, documentation of corrective actions and monitoring to assure that corrective actions have been effective.

E. Test Records

Records are to be legible and stored and retained in such a way that they are readily

retrievable. Storage must be in facilities that provide a suitable environment to prevent damage, deterioration or loss. Retained records are to include quality and calibration records and test data. If an error is made in recording data, it is to be lined-out and the correct information recorded, the change initialed and a reason provided for the change. Erasures, correction tape or correction liquid are not acceptable.

F. Environmental Conditions

Test areas must have proper energy resources, lighting, temperature control, humidity control and other environmental conditions required to conduct tests.

G. Test Vehicle Criteria

The test lab shall verify that vehicles provided to the lab for NMEDA CRP compliance testing meet the following criteria:

All test vehicles should be in new OEM condition. If a used vehicle is proposed, the used vehicle must be:

- Less than 2 years old
- Less than 40,000 miles
- Current OEM platform design
- No accident records (Carfax)

If any of the provided test vehicles do not meet this criterion, contact NMEDA CRP for disposition.

H. Test and Measurement Equipment

The test lab shall be furnished with test equipment sufficient to correctly perform tests in accordance with the applicable test plan or procedure. The equipment is to be at least as accurate as specified or implied in the test plan or test standard. All equipment shall be in good working order and calibrated appropriately. Each instrument shall bear a calibration sticker with both the latest calibration date and the calibration due date.

I. Calibration Traceability

Measurement equipment must be calibrated to a nationally or internationally recognized standard. When traceability is not possible, other procedures must be used to assure

traceability in accordance with ISO 17025. The calibration frequency shall be determined to assure required accuracy between calibrations. Generally, equipment shall be calibrated at least annually. Any limitations of usage should be clearly indicated.

Note: Test equipment calibration must be conducted by an accredited calibration laboratory.

J. Test Plan

All tests conducted under the NMEDA CRP Third-Party Test Program are to include a test plan that is approved in advance by NMEDA.

As a minimum, the manufacturer/alterer test plans are to include the following items:

J1. Name of test lab and NMEDA lab accreditation number.
J2. F/CMVSS number(s) and section(s) to be tested.
J3. Test vehicle and/or component description, e.g., year, make, model, conversion model, mileage, vehicle weight, vehicle condition (e.g. new, non-accident), BIW, engine, VIN, part number, etc.
J4. For vehicle tests, a statement that the test vehicle(s) are suitable for testing.
J5. Conversion and/or component description, e.g., seat configuration, seat description, anchorage locations, dropped floor type, dimensions, material, fuel tank, wheel. chair locations, etc.
J6. Person in the company responsible for compliance.

NOTE: It may be in the interest to the manufacturer to submit the test plan to NMEDA before the test vehicle is purchased.

K. Test Report – Lab Internal

The internal test report is the complete report with all raw data and data entries, identified photographs, videos, observations, graphs, charts, test vehicle description, and any other information that may or may not be proprietary to the test lab or its customer. This report will only be shared with NMEDA or its legal entity if required by law.

L. Test Report – NMEDA

The NMEDA test report is primarily a summary of test results along with some CRP specific elements that validate the testing was performed in compliance with NMEDA CRP requirements. This report is used by NMEDA members as objective evidence for regulatory compliance to applicable federal regulations and any other applicable standards.

In addition to the requirements called out in ISO 17025 section 7.8.1.2, the NMEDA test report shall include a cover page and results page with the following:

Cover page:

L1. Lab letterhead
L2. F/CMVSS number(s) and applicable section(s)*
L3. Vehicle – year, make, model, conversion model
L4. Lab test number and date of test
L5. Name of company prepared for
L6. Name of company (lab) prepared by

* Some sections may not be affected by the conversion. Contact NMEDA for applicable F/CMVSS and section(s).

Results page:

a. Test vehicle (VIN) and/or component description, e.g., mileage, vehicle test weight, BIW, engine, VIN, etc.
b. Conversion description, e.g., seat configuration, seat description, anchorage locations, dropped floor type, dimensions, material, fuel tank, wheel chair locations, etc.
c. Test result summary, e.g., speeds, forces, burn rates, fuel leakage, special thresholds (e.g., PTSB adjustments), etc.
d. Statement that test method/procedure was followed and that product was tested for certification objective, i.e. slightly above requirements
e. Signatures, disclaimers, waivers, contacts, etc.

M. Change Notification

It is the test lab's responsibility to notify NMEDA of any changes in equipment, personnel, location, or documented procedures relevant to program testing. Based on the changes, NMEDA may decide to reassess the facility to reevaluate conformance with the program.

N. Application

Test Labs interested in participating in NMEDA's Third-Party Test Data Program can contact the NMEDA office at (813) 264-2697.

O. Approved Test Labs

Test labs that have been approved to perform testing under the NMEDA CRP Third-Party Test program are posted on the NMEDA website.

P. Definitions and Acronyms

Alterer – A company that makes alterations to certified vehicles.

BIW – Body in White (OEM stripped down body that can be used for test purposes).

CRP – Compliance Review Program that is administered by NMEDA.

F/CMVSS – Federal (/Canada) Motor Vehicle Safety Standards**.**

ISO 17025 – General requirements for the competence of testing and calibration laboratories

ISO 9001 - Quality management system requirements

NMEDA – National Mobility Equipment Dealers Association.

Test Lab Process Flow (NMEDA program participants)