

# NFRC 7002-2025 [E0A0]

## Inspection Agency Program

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### **National Fenestration Rating Council**

6305 Ivy Lane, Suite 410

Greenbelt, MD 20770

P:(301) 589-1776

Email: [info@nfr.org](mailto:info@nfr.org)

Website: [www.nfr.org](http://www.nfr.org)

## *Foreword*

The National Fenestration Rating Council, Incorporated (NFRC) manages and operates a uniform rating system for energy and energy-related performance of fenestration products. The Rating System reports the U-factor, Solar Heat Gain Coefficient (SHGC), Visible Transmittance, Air Leakage (AL), and Condensation. These ratings may be mandatory or optional based on the product category being certified. Together, these rating procedures, as set forth in documents published by NFRC, are known as the NFRC Product Certification Program (PCP).

The NFRC Rating System employs computer simulation and physical testing to establish energy and related performance ratings for fenestration products. The NFRC Rating System is reinforced by a certification program under which NFRC-licensed participants claiming NFRC product certification shall label and certify fenestration products to indicate those energy and related performance ratings, provided the ratings are authorized for certification by NFRC and under ongoing inspection and assessment by a recognized Inspection Agency.

The requirements of the rating, certification, and labeling program (Certification Program) are set forth in this document and the most recent versions of documents referenced and associated with the PCP.

## *Disclaimer*

NFRC certification is the authorized act of a Manufacturer/Responsible Party in labeling a fenestration or related attachment product with an NFRC Permanent Label and/or, based on the product category, NFRC Temporary Label with the mandatory ratings, as well as any selected optional rating, as reported by NFRC-recognized simulation and testing laboratories, evaluated by an Inspection Agency and authorized for certification by NFRC. Each of these participants acts independently to report, recommend certification, and provide information to NFRC for certification based on the PCP requirements.

Certification by NFRC does not constitute a warranty or endorsement regarding any characteristic of a fenestration or fenestration-related attachment products. Certification is not an endorsement of or recommendation for any manufacturer's product or product line or any attribute of a product or product line. NFRC is not a merchant in the business of selling fenestration products or fenestration-related products and therefore cannot warrant products as to their merchantability or fitness for a particular use.

Questions about the NFRC Product Certification Program can be directed to the National Fenestration Rating Council.



## Table of Contents

1. Scope.....	5
2. References .....	5
3. Roles.....	6
3.1 NFRC.....	6
3.2 Inspection Agencies .....	6
3.3 Certification Policy Committee .....	7
4. IA Licensing Requirements.....	8
4.1 Application and License .....	8
5. Organizational Requirements .....	8
5.1 Organizational Structure.....	8
5.2 Personnel Requirements.....	9
5.3 Independence and Impartiality.....	10
5.4 Confidentiality.....	11
5.5 Technical Competence.....	11
5.6 Liability .....	12
6. IA Quality System Requirements .....	12
4.1 Accreditation – Compliance to ISO/IEC 17020.....	12
4.2 General Quality System Requirements (Based on ISO/IEC 17020).....	12
4.3 NFRC Specific Quality Systems Requirements .....	13
7. Approval Process and Ongoing Licensing of IAs .....	15
7.1 Application Packet .....	15
7.2 NFRC Initial Review .....	15
7.3 Initial and Biennial Operations Inspections .....	16
7.4 In-Plant Witness Inspection .....	16
7.5 Recognition of an IA.....	17
8. Reporting and Investigation Activities .....	18
8.1 Reporting.....	18
8.2 Investigations .....	19
8.3 Labeling Noncompliance.....	19
8.4 Program Metrics and Data.....	19
9. Evaluation for Certification .....	19



9.1	Simulations and Testing .....	19
9.2	Product Line Values and Options .....	20
9.3	Product Labeling .....	20
10.	Submissions for Certification to NFRC .....	20
10.1	Submissions.....	20
11.	Authority of an IA.....	21
11.1	Inspections .....	21
11.2	Virtual Inspections .....	21
11.3	Labeling .....	22
11.4	Recommendations to NFRC .....	22
11.5	Extensions and Type 1 Waivers.....	22
12.	Revision History .....	23

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## 1. SCOPE

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This document outlines the licensing, requirements, activities, and recognition of Inspection Agencies (IA) as part of the NFRC Product Certification Program (PCP). IAs are a critical part of the product certification process and the ongoing surveillance for participants and products taking part in the PCP.

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## 2. REFERENCES

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While not directly referenced in this document, IAs shall be familiar with the documents below as they pertain to the NFRC PCP per the requirements of Section 6.3.ii.b.

- NFRC 7000: Product Certification Program
- ANSI/NFRC 100: Procedure for Determining Fenestration Product U-factors
- NFRC 102: Procedure for Measuring the Steady-State Thermal Transmittance of Fenestration Systems
- ANSI/NFRC 200: Procedure for Determining Fenestration Product Solar Heat Gain Coefficient and Visible Transmittance at Normal Incidence
- NFRC 201: Procedure for Interim Standard Test Method for Measuring the Solar Heat Gain Coefficient Fenestration Systems Using Calorimetry Hot Box Methods
- NFRC 500: Procedure for Determining Fenestration Product Condensation Resistance Value
- ANSI/NFRC 500: Procedure for Determining Fenestration Product Condensation Index Ratings
- NFRC 600: Glossary and Terminology
- NFRC 706: Requirements for Participating Insulating Glass Certification Programs
- NFRC 7007: Compliance and Monitoring Program
- NFRC 7018: Product Certification Program Labeling and Mark Usage Requirements
- NFRC 7019: PCP Extension and Waiver Process
- NFRC Fee Schedule
- NFRC 710: Operating Policies Manual
- NFRC 7100: Windows, Doors, and Standard Skylights—PCP Product Requirements

- NFRC 7102: Applied Films – PCP Product Requirements\*
- NFRC 7103: Tubular Daylighting Devices – PCP Product Requirements\*
- NFRC 715: Commercial Energy Performance Certification Program: Products & Projects

\* Not yet published

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## 3. ROLES

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NFRC has established and will sponsor and operate the Inspection Agency Program (IAP) as part of the PCP operated under NFRC 7000. Under the IAP, major roles and responsibilities for the operation of the program are shared by NFRC, IAs, and the Certification Policy Committee (CPC). Some of those roles and responsibilities are defined in this section:

### 3.1 NFRC

- A. Establishes and periodically reviews IAP requirements;
- B. Approves and licenses IAs based on the requirements of the IAP;
- C. Provides training and guidance on policies, procedures, challenges, appeals, and interpretations of program requirements;
- D. Provides input on potential impartiality issues;
- E. Reviews and approves product certification submittals;
- F. Performs periodic inspection of recognized agencies to ensure compliance with the requirements of this document;
- G. Performs periodic quality control reviews of all certification documentation to ensure all product certification functions are being performed in accordance with the PCP, the IAP, and the Laboratory Accreditation Program (LAP);
- H. Reports negative findings of quality control or periodic inspection reviews to LAP staff as appropriate; and
- I. Makes recommendations to the CPC regarding IA assessments, compliance, and recommended changes to the program.

### 3.2 Inspection Agencies

- A. Maintains a quality management system and operations in compliance with ISO/IEC 17020 and the requirements of this NFRC 7002 document;

- B. Maintains documented procedures, forms, checklists, and tools that allow for the required NFRC activities, inspections, quality control checks, and reporting requirements;
- C. Maintains in good standing a license agreement with NFRC;
- D. Provides client support for the submission and maintenance of products for the PCP;
- E. Reviews physical test reports and simulation reports for compliance with program requirements and certification;
- F. Completes and submits a “Certification Submittal Checklist” for products seeking Certification Authorization and modifications to products already authorized;
- G. Performs initial and surveillance inspections of participant plants authorized for NFRC certification;
- H. Verifies product and component measurements and materials as part of periodic inspections and investigations;
- I. Participates in the investigation of and supplies NFRC information on licensee noncompliance to the requirements of the PCP, including PCP noncompliance found during operation of the FenStar Certification Program. Common noncompliance issues are labeling deficiencies and incomplete or incorrect certification documentation. Examples of prohibited activities are detailed in Section 9 of NFRC 7007;
- J. Audits Custom Project Path design and Final Project Certificates and Product Directory Path Label Certificates in accordance with NFRC 715;
- K. Reviews simulation and test reports for validation per NFRC 715; and
- L. Conducts in-plant inspections of manufacturing locations in accordance with NFRC 715.

### **3.3 Certification Policy Committee**

The CPC is an NFRC committee tasked with the oversight of the PCP. The CPC:

- A. Provides interpretation, as needed, on policies relating to the IAP;
- B. Provides interpretation, as needed, on policies relating to the PCP;
- C. Provides rulings on appeals brought to the committee;
- D. Recommends modifications to the IAP and PCP,
- E. Provides input on impartiality issues brought to the committee through NFRC staff;

- F. Reviews applications, surveillance audits, NFRC staff recommendations, and maintenance of IA Licensee status;
- G. Reviews and approves Individual-in-Responsible-Charge (IRC) applications from the IAs;
- H. Provides input as needed on appeals brought to the Board or Executive Committee; and
- I. Provides input on other issues brought forth by NFRC staff concerning the IAP and oversight of IAP operations and inspections.

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## 4. IA LICENSING REQUIREMENTS

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Agencies seeking licensing through the IAP shall initiate the licensing process by submitting an application and license agreement to NFRC, per Section 8 of this document.

Note: Application fees are non-refundable.

### 4.1 Application and License

NFRC shall review the application and verify that the applicant meets the necessary licensing requirements. If the applicant meets those requirements, an initial onsite inspection shall be scheduled (See Section 8).

- i. IAs that choose to subcontract compliance and related services, including inspections, for their recognition as an IA shall provide NFRC with their policies and procedures on verification that subcontracted organizations meet the requirements of this document.
  - A. Subcontracted agencies performing an IA's activities must enter into a license agreement with NFRC and are subject to the requirements of this document, including surveillance by NFRC.

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## 5. ORGANIZATIONAL REQUIREMENTS

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Any organization seeking NFRC recognition as an IA must meet all the organizational requirements of this section.

### 5.1 Organizational Structure

- i. Where the IA forms a part of a legal entity performing other activities, the relationship between these other activities and inspection activities shall be defined.
- ii. The IA shall be organized and have adequate financial and personnel resources to enable it to maintain the capability to perform its inspection activities.

## 5.2 Personnel Requirements

The IA shall define and document the responsibilities and reporting structure of the organization including, at minimum, these positions for NFRC Activities:

- i. Person In Responsible Charge (IRC)
  - A. The IA shall have available one or more people, reviewed and approved by the CPC, designated as IRC who have overall responsibility to ensure that the product certification and inspection activities are carried out in accordance with the IAP.
  - B. The person(s) fulfilling this function shall be deemed technically competent and knowledgeable in the operation of the IA. Where the IA has more than one IRC, the specific responsibilities of each individual shall be defined and documented.
    - I Each IRC shall have a minimum of four years of experience in product certification, inspection, or quality assurance. A minimum of two of the four years shall be in the certification and/or inspection of products for NFRC certification.
    - II If an applicant IA does not have a proposed or current IRC that meets these requirements, the CPC, at its sole discretion, shall determine if their experience in the validation and certification field or other factors may be substituted for the above requirements.
  - C. Each IRC shall have attended at least one NFRC-sponsored Simulation Workshop, including all required simulation training for participation in every certification program in which the IA is participating.

- D. If an IA has no IRC employed or under contract, the IA shall fill the IRC position within 30 days of the employee or contractor leaving. The IA shall be allowed to continue to provide IA services during the 30-day period. In the event the IA does not fill the vacated IRC position within 30 days, the IA shall be suspended by NFRC until such time as the IRC position is filled unless an extension is granted by the CPC.
- ii. In-Plant Inspector
  - A. The IA shall have available one or more person(s) designated as In-Plant Inspector (inspector) who have overall responsibility to ensure the assessment activities are carried out in accordance with the IAP.
  - B. The person(s) fulfilling this function shall be deemed technically competent per the requirements of Section 6.2.2 to ensure compliance with the inspection requirements of IAP and Product Specific Requirements.
- iii. Other Roles

The IA shall have job descriptions and responsibilities defined for individuals performing activities in quality assurance, and in support of NFRC inspection, review, submittal, administration, and certification.

### 5.3 Independence and Impartiality

The IA, and their subcontractors, shall be responsible for the impartiality of its activities and shall not allow commercial, financial, or other pressures to compromise impartiality.

- i. Equity owners, officers, directors, managers, employees, or any affiliate of such person, may not:
  - A. Have financial interest in, or family or organizational affiliation to any fenestration product or component designer, manufacturer, supplier, vendor, or specifying authority;
  - B. Have any financial interest in, or family, or organizational affiliation to any firm for which any one of them provides NFRC-accredited testing, Approved Calculation Entity (ACE) services, or simulation services, or be an equity owner, officer, director, manager, or employee of any such firm;

- C. Advocate or recommend any products, product manufacturers, product materials or types, or require the use of a simulation and/or testing laboratory providing NFRC-accredited services for which the IA provides NFRC services; or
  - D. Be involved in the commercial design or fabrication of fenestration products or components
- ii. If a risk to impartiality is identified, the IA shall be able to demonstrate how it eliminates or minimizes such risk on an ongoing basis.
  - iii. The IA shall have top management commitment to impartiality.
  - iv. IAs, as part of the Quality Management System, shall have procedures and documented evidence that employees understand and acknowledge the requirements of impartiality.

#### **5.4 Confidentiality**

- i. Licensed IAs shall hold confidential any information gathered through the process and maintenance of certification and shall not release any information without the consent of the licensee, except to NFRC as part of the certification or investigative process for participants and products authorized or seeking certification authorization.
- ii. IAs shall maintain confidentiality agreements with their clients as it relates to products, reports, and certification authorizations.
- iii. IAs, as part of the Quality Management System, shall have procedures and documented evidence that employees understand and acknowledge the requirements of confidentiality.
- iv. NFRC shall retain the ability to request from IAs and recognized laboratories reports, data, and information pertaining to products authorized and seeking certification authorization.

#### **5.5 Technical Competence**

In the event that a newly approved version of an NFRC-recognized software for product simulations of energy performance is adopted, a licensed IA shall participate in an NFRC training program for the new version. NFRC shall determine the IA's competency in understanding and employing the new version through testing and/or inspection.

In the event that changes are made to methods or procedures, including software and tools, IAs shall participate in an NFRC training program for the new methods or procedures.

- i. Each IA shall demonstrate knowledge and understanding in utilizing the NFRC Certified Products Database (CPD) and Component Modeling Approach Software Tool (CMAST) for all IA required activities. Prior to licensing, all IA applicants shall have completed a NFRC training course, which incorporates operational training procedures for utilizing the databases.

## **5.6 Liability**

The IA shall have adequate provisions (e.g. insurance or reserves) to cover liabilities arising from its operations.

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# **6. IA QUALITY SYSTEM REQUIREMENTS**

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IAs shall develop, define, implement, and maintain policies, procedures, and/or documentation necessary to ensure consistent practices when providing NFRC activities and services.

## **4.1 Accreditation – Compliance to ISO/IEC 17020**

All recognized IAs shall maintain accreditation to ISO/IEC 17065 or ISO/IEC 17020, by an International Laboratory Accreditation Cooperation (ILAC) recognized Conformity Assessment Body, as well as conformance to the requirements in Sections 6.2 and 6.3 below.

## **4.2 General Quality System Requirements (Based on ISO/IEC 17020)**

All IAs shall meet the minimum quality systems requirements of ISO/IEC 17020 noted below.

- i. Impartiality and Independence
  - A. The IA shall have procedures in place to identify and document risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, or from its relationships, or from the relationships of its personnel.
- ii. Confidentiality
  - A. The IA shall have procedures in place to ensure the confidentiality of information gathered during the inspection and certification processes for NFRC activities.
  - B. The IA shall have procedures and documentation in place for the training of confidentiality requirements for all personnel performing NFRC activities.

- iii. Personnel Requirements
  - A. The IA shall document the job responsibilities, requirements, training, and qualifications for all personnel performing NFRC activities.
  - B. At minimum, the personnel defined in section 4.2 shall be clearly identified and responsibilities defined.
- iv. Equipment
  - A. The IA shall maintain a list of equipment utilized in the inspection process utilized for NFRC activities, as well as the calibration frequencies of the equipment.
  - B. The IA shall maintain equipment utilized for the verification of measurements as part of inspections in working conditions suitable for the measurements and tolerances being verified.
  - C. Where possible, equipment shall be calibrated to international standards. Where equipment cannot be calibrated to international standards, evidence shall be available to show that equipment is calibrated to the device manufacturer's standards.

#### **4.3 NFRC Specific Quality Systems Requirements**

In addition to the general quality system requirements, IAs shall have procedures and documentation in place for the following NFRC requirements.

- i. Contractual Agreements
  - A. Maintaining contractual arrangements with their personnel that address roles, responsibilities, confidentiality, and impartiality in an ongoing manner.
  - B. Maintaining contractual arrangements with participants for the services provided by the IA in conjunction with NFRC Certification activities.
- ii. Training
  - A. Training and documenting of personnel that allows the IA to deem staff technically competent for performing their specific functions related to their NFRC activities.
  - B. Training shall include understanding the IAP and PCP requirements (see section 2 References), bulletins, and NFRC training required to perform duties assigned by the IA.



C. Ongoing training and surveillance of IAP requirements for inspectors, including onsite evaluation of inspection personnel, shall be defined and documented.

iii. Evaluation Activities

- A. Procedures and documentation to ensure that evaluation for certification is performed in accordance with the necessary rules and procedures and product specific requirements.
- B. Procedures for the evaluation of simulation and/or test reports in support of submittals to NFRC.
- C. Procedures for the completion and submittal of the NFRC Certification Checklist, along with all supporting documentation.

iv. Inspection Activities

- A. Procedures for conducting initial and ongoing surveillance inspections.
- B. Procedures necessary for inspectors to evaluate and ensure authorized products are manufactured based on program and applicable product specific requirements.
- C. Procedure for communicating results of initial and ongoing surveillance inspections to participants.
- D. Procedure for review and closure of noncompliance issues.
- E. Procedure for providing NFRC with copies of inspection reports and documentation supporting the review and closure of noncompliance issues.

v. Verification of Products and Components

- A. Procedures for the review, verification, and documenting of physical measurements and components of NFRC authorized product lines to ensure products are manufactured as they are authorized for certification.
- B. The minimum number of products to be reviewed during each inspection shall be based on the total number of product lines authorized for certification at the facility and shall follow the table below.

Total authorized product lines produced at each facility	Target number of authorized products to inspect
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1 to 25	3
26 to 90	5
91 to 150	8
≥151	13

- vi. Review of Quality Management System (QMS)
  - A. Procedure for conducting and documenting a review of the QMS at least annually.
  - B. Procedure for addressing any findings from the QMS and documentation of any revisions made.
- vii. Records and Record Retention
  - A. Defined procedures for maintaining records and activities related to NFRC inspections and authorized products for a minimum of five years after the expiration of the product certification.

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## 7. APPROVAL PROCESS AND ONGOING LICENSING OF IAS

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As part of becoming a recognized entity under the IAP, each applicant shall be required to go through the approval process and an initial operations and in-plant witness inspection. Ongoing licensing shall require annual in-plant witness inspections by NFRC and biennial operations inspections. The following outlines the approval process and the activities of the ongoing licensing inspections.

An applicant seeking NFRC licensing through the IAP shall submit an application packet to NFRC staff for review.

### 7.1 Application Packet

The application packet shall consist of:

- i. application,
- ii. license agreement,
- iii. confidentiality agreement,
- iv. impartiality disclosure,
- v. company profile, and
- vi. pro-forma invoice (application fees are not refundable).

### 7.2 NFRC Initial Review

- i. NFRC staff, within 15 business days, shall verify that the submitted application packet is complete, and shall confirm payment of the application fee.
- ii. If approved, NFRC staff shall contact the IA representative to set up the initial inspection.
- iii. If denied, NFRC staff shall contact the IA representative and shall provide reason(s) for the denial.

### **7.3 Initial and Biennial Operations Inspections**

NFRC staff shall conduct inspections of the IA operations to ensure compliance with IAP requirements,

- i. NFRC shall request objective evidence and documentation of compliance to the QMS and Organizational requirements defined in the IAP prior to scheduling a date for the inspection. At the sole discretion of NFRC, the inspection may be done on-site at the offices of the applicant or remotely.
- ii. After the review of documentation provided, NFRC shall contact the applicant to make the appropriate arrangements for the initial inspection. NFRC shall schedule and provide the applicant with the inspection plan, based on the review of the documentation. Any changes to the inspection plan shall be communicated to the applicant prior to the scheduled date of the inspection.
- iii. During the initial inspection, NFRC shall review the completed application packet, the agenda, and the inspection plan.
- iv. NFRC shall review the IA organization, management structure, and operating procedures to ensure the IA has developed, defined, implemented, and maintains authority and responsibility for requirements defined in the IAP.
- v. Upon completion of the inspection, NFRC shall identify and communicate potential compliance gaps and findings during a closing meeting and shall discuss potential resolutions.
- vi. Not more than 15 business days after the inspection, NFRC staff shall provide the applicant with the formal report. The applicant shall have 30 business days to rectify, or provide an action plan for rectifying, any noncompliant items from the inspection.
- vii.

### **7.4 In-Plant Witness Inspection**

- i. After successful completion of the initial inspection and resolution of any findings, and as part of the ongoing licensing inspections of the

IA, NFRC shall request the planning of an in-plant witness inspection at a licensee's manufacturing location. At the discretion of NFRC staff, the initial or annual in-plant witness inspection may be done remotely. If the initial in-plant witness inspection is done remotely, all requirements of this document shall be met.

- ii. Prior to the in-plant witness inspection:
  - A. The IA shall assign an inspector and provide NFRC with the product category to be inspected, the assigned inspector's training records, credentials, and checklists for the inspection being performed.
  - B. The IA shall contact the licensee to schedule the in-plant witness inspection and confirm dates of the visit with the licensee and the NFRC representative.
  - C. Before the scheduling of the initial in-plant witness inspection at a manufacturing location an applicant shall resolve noncompliant items from the initial inspection. Ongoing annual in-plant witness inspections may be scheduled and conducted at any time.
- iii. The in-plant witness inspection and reporting shall include:
  - A. Review of the inspector and inspection process at the licensee's manufacturing location to ensure conformance with the IA-approved QMS.
  - B. Review of the inspection process based on NFRC 7002, NFRC 7000, NFRC 715 (if applicable), and the applicable Product Specific Requirements.
  - C. A formal report generated by the NFRC noting observations and any noncompliance issues and opportunities for improvement with established deadlines for addressing findings.

## 7.5 Recognition of an IA

- i. Initial Approval/Denial
  - A. Upon completion of the initial inspection, in-plant witness inspection, and NFRC review and approval of any findings, a recommendation for recognition shall be sent to the CPC.
  - B. If an IA applicant fails to meet the requirements of this document, resolve findings from the inspection or in-plant witness inspection, or is not approved by the CPC, the

- application shall be denied. NFRC staff shall notify the applicant of the reason for the denial.
- C. Should IA approval be denied, the applicant shall have the right to appeal the decision per the appeals process in NFRC 7000.
- ii. Ongoing Approval
- A. Upon completion of the operations inspection, in-plant witness inspection, and NFRC review and approval of any findings, a recommendation for continued recognition shall be sent to CPC
  - B. If an IA fails to meet the requirements of this document, or resolve findings from an inspection or in-plant witness inspection, NFRC staff shall recommend to the CPC for the IA to be suspended. If upheld by the CPC, NFRC staff shall notify the IA of the suspension and reason for the suspension.
  - C. The IA shall have the right to appeal a suspension per the appeals process in NFRC 7000.

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## 8. REPORTING AND INVESTIGATION ACTIVITIES

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IAs shall report information to NFRC as required by section 8.1.

IAs shall assist NFRC, when requested, in investigations regarding noncompliance with program requirements, challenges, and appeals, or as an action as part of the NFRC 7007: Compliance and Monitoring Program (CAMP).

### 8.1 Reporting

- i. IAs shall report to NFRC changes in contractual agreements between the IA and their licensee that require resigning or revision to those agreements for the purpose of NFRC certification and associated activities. These changes include but are not limited to:
  - A. Changes in manufacturing locations;
  - B. Changes in contact information;
  - C. Changes in corporate ownership, name, or structure; and
  - D. Changes to agreements for the purpose of an IAs activities as a recognized agency of NFRC.
- ii. IAs shall provide NFRC copies of inspection reports for inspections of NFRC-authorized products, QMS, and facilities upon request.

- iii. IAs shall provide a summary checklist from each inspection indicating the type of noncompliance issues (if any) and remedial action taken by the licensee (if any).
  - A. As follow-up, the IA shall provide NFRC with notification of the closing, or escalation, of noncompliant items as the result of an inspection and the actions taken to close or escalate the matter.

## **8.2 Investigations**

- i. IAs shall assist NFRC in investigations relating to noncompliance, challenges, and appeals as requested by NFRC.
- ii. IAs shall provide documentation used to support certification of products, including information referenced in Section 5.4.2, as well as inspection reports and data used in the IA review for certification, when requested by NFRC to support investigating and reviewing challenges, appeals, and participant noncompliance issues.

## **8.3 Labeling Noncompliance**

IAs shall report to NFRC certification staff any notifications of labeling issues communicated outside an inspection by consumers, code officials, or other NFRC stakeholders. Labeling issues shall include Fenestration Manufacturer Certificate (FMC) discrepancies and corrective actions made on site.

## **8.4 Program Metrics and Data**

As requested by NFRC, an IA shall provide NFRC program noncompliance, inspection, program activity, and information that may be used to track program activities and help improve program requirements and processes.

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# **9. EVALUATION FOR CERTIFICATION**

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The IA shall evaluate the following information and documentation, as applicable, for compliance to the PCP and Product Specific Requirements (PSR)

## **9.1 Simulations and Testing**

- i. Ensure simulations and testing are performed by NFRC 701-Accredited simulation labs and test labs.
- ii. Confirm simulations are performed using NFRC's approved versions of the software.

- iii. Review simulation reports to ensure compliance with NFRC 701.03.
- iv. Review physical test reports to ensure compliance with NFRC 701.04.

## 9.2 Product Line Values and Options

- i. Verify the simulation values of the test option and one other option within the product line matrix.
  - A. Where there are changes to the frame or spacer, verify at least one option within each of those models.
- ii. Verify all product or product options seeking certification authorization within a Product Line are in accordance with the requirements of the associated PSR.
- iii. Verify that values for all mandatory ratings are calculated for the individual product or product options seeking certification authorization.

## 9.3 Product Labeling

- i. Review a copy of the proposed label or label template intended for use from each qualified plant. Labeling shall meet the requirements found in NFRC 7018.
  - A. For new participants, obtain and review a copy of the label template and submit to NFRC.
- ii. Submit to NFRC the necessary documentation and supporting information required by the product requirements.

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# 10. SUBMISSIONS FOR CERTIFICATION TO NFRC

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Recognized IAs shall be responsible for submitting certification documentation to NFRC on behalf of their clients through the Product Certification Management System (PCMS).

## 10.1 Submissions

- i. IA shall follow the PSR and complete the associated checklist(s) required for certification submittals to NFRC.
- ii. All submissions shall include the necessary checklists, simulation and/or test reports to support the certification submittal, and supporting documentation (Bill of Materials, product drawings, product matrix, IA Review checklist) for the product line submitted.

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## 11. AUTHORITY OF AN IA

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In the course of NFRC activities, an IA has the authority to act on behalf of NFRC and shall report to NFRC those actions and any remedial actions taken by a participant to resolve any noncompliance to the PCP requirements, labeling, and PSRs as follows:

### 11.1 Inspections

- i. Conduct announced and unannounced surveillance inspections.
- ii. Perform additional inspections, if needed, to confirm the implementation of corrective actions
  - A. Costs related to re-inspection necessitated by a failure to meet program requirements shall be borne by the licensee and shall not be borne by the IA or NFRC
- iii. Have access to facilities and production areas where components and authorized/certified products are produced, warehoused, or labeled.
- iv. Request records pertaining to the QMS, production, and purchasing information of product components used in authorized/certified products.

### 11.2 Virtual Inspections

NFRC recognizes that there may be circumstances where on-site inspections are not possible and virtual inspections shall be performed by the IA:

- i. NFRC may issue a directive on, or an IA may elect to perform, virtual inspections when on-site inspections are not possible due to potential health and/or safety risks of the IA personnel and participants employees due, but not limited, to the following:
  - A. Risks of exposure to viruses or illness that may endanger the IA personnel or manufacturers employees (pandemics, endemics, epidemics),
  - B. Weather events that may put the IAs personnel in danger (hurricanes, tornados, ice/snowstorms),
  - C. Restrictions on travel to/from the plant location from a governmental body,
  - D. Travel to an area where criminal or governmental activities may put the IAs personnel at risk of potential harm, or

- E. Where a manufacturer requests virtual inspections based on any of the above.
- ii. IAs shall have in place procedures and technology that allow for successful completion of virtual inspections including:
  - A. Documenting the reason for the virtual inspection,
  - B. Acknowledgement from the participant accepting the virtual inspection, and
  - C. Methods to ensure that the required information is reviewed and objective evidence is obtained meeting the requirements of the NFRC – Virtual Inspection Requirements Technical Interpretation:
    - I The NFRC – Virtual Inspection Requirements Technical Interpretation may be amended and updated from time to time to accommodate program changes and inspection needs.

### **11.3 Labeling**

- i. Approve or deny field labeling requests from licensees based on the requirements for field labeling defined in NFRC 7018.

### **11.4 Recommendations to NFRC**

- i. Recommend to NFRC suspension of product lines based on surveillance and inspection activities.
- ii. Report to NFRC misuse of the certification or word mark in labeling, product literature, and electronic media not in compliance with the labeling guidelines to NFRC for investigation.
- iii. Report any activities of a participant or recognized entity of NFRC activities not in compliance with NFRC documents or requirements that may be misleading to consumers, misrepresent NFRC Certification, or be detrimental to NFRC or the PCP.
- iv. Recommend to NFRC suspension of labeling of product lines based on inspection findings or findings as the result of investigating noncompliance to program requirements reported by any means.

### **11.5 Extensions and Type 1 Waivers**



IA may assist in submitting information for extensions or Type 1 waivers for certified product lines.

- i. Extensions and waivers shall follow the requirements and rules in NFRC 7019.

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## 12. REVISION HISTORY

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Document Revision Log				
Section	Revision	Review	Approval	Date Released
All	New Document Release	Board	10/31/25	TBD