

Occupational Safety & Health Administration

Nationally Recognized Testing Laboratory Program

**Satellite Notification and Acceptance Program (SNAP)
Application Guidelines**

**US Department of Labor
Occupational Safety and Health Administration
Directorate of Technical Support and Emergency Management**

Brief Overview of the NRTL Program

Occupational Safety & Health Administration (OSHA) safety standards require that specified equipment and materials (products) be approved for safety by an OSHA-recognized organization. OSHA's Nationally Recognized Testing Laboratory (NRTL) Program fulfills this responsibility by recognizing the capabilities of (mainly) private sector testing organizations to test and certify such products for manufacturers. The NRTL Program, in operation since 1988, is an effective public and private partnership. Rather than performing testing and certification itself, OSHA relies on private sector organizations to accomplish it.

To be recognized as an NRTL, a qualified organization must meet the requirements in 29 CFR 1910.7, which signifies that it is qualified to perform independent (i.e., third-party) product safety testing and certification, the two key operations in approving products. More broadly, the NRTL must operate a product safety-testing program and a product-certification program. The latter program, for purposes of OSHA requirements, consists of listing/labeling and follow-up inspection programs. While both operations are necessary for approval, the NRTL's certification program is fundamentally important to the control of the approval process. Not only does this program involve the issuance of the initial certification, but through it the NRTL also gains assurance that all manufactured units of the product have the same safety features as the unit initially tested and certified.

In fulfilling their NRTL role, these organizations use generally accepted, consensus-based product safety standards issued by national standards-producing organizations such as:

- American National Standards Institute (ANSI)
- American Society for Testing Materials (ASTM)
- Factory Mutual (FM)
- Underwriters Laboratories (UL)

NRTL's Scope of Recognition and SNAP

Each NRTL is approved for a scope of recognition which identifies: (1) the types of products the NRTL may approve, (2) the NRTL's "recognized sites" which are the NRTL's wholly-owned sites that can perform the full range of product testing and certification activities necessary in approving those products, and (3) "supplemental programs." Through the supplemental programs, NRTLs may use the services or activities of other parties or facilities (i.e., other resources) for purposes of testing and certifying products. The NRTL must receive OSHA approval for such use, and approval is granted for use of specific categories of activities or facilities. Each of these categories constitutes a "supplemental program," and to receive approval to use a program, the NRTL must meet the program-specific criteria.

The first eight supplemental programs (designated as Program 2 through Program 9) were formally established through publication of a Federal Register (FR) notice on March 9, 1995 (60 FR 12980). These programs primarily focused on use of other party testing. (Although described in the notice, Program 1 does not involve reliance on other parties and, as a result, is not a supplemental program. Consequently, it is not listed below although it affects the number designation of the other programs.) In 2009, OSHA adopted a ninth supplemental program (Program 10), Satellite Notification and Acceptance Program (SNAP), which serves a purpose different from the other 8 programs. Its effective date is May 11, 2009. To apply for SNAP, first, thoroughly review the current SNAP Description. It details the terms and conditions that an NRTL or NRTL applicant must meet to use SNAP. Then, assemble and submit all of the information described in these guidelines. You are not required, but are strongly encouraged, to submit all the information requested in the formats shown. An application for SNAP is subject to the terms and conditions of the current SNAP Description. These guidelines also provide instructions for NRTLs to use for notifying OSHA of changes to elements of the NRTL's SNAP operations.

For more information about supplemental programs, or more generally, about the NRTL Program, and its

policies and procedures, see the NRTL Program Directive (OSHA Instruction CPL 01-00-003 - CPL 1-0.3, NRTL Program Policies, Procedures, and Guidelines).

Information

If you have questions about the NRTL Program or these guidelines, or would like to receive more information or guidance in completing a SNAP application, please call 202-693-2110.

If submitting any hard copies (e.g., completed applications, amendments to applications, or other correspondence), mail to:

Director
Office of Technical Programs and Coordination Activities
NRTL Program
Occupational Safety and Health Administration
US Department of Labor
200 Constitution Avenue NW, Room N3653
Washington, DC 20210

If submitting by e-mail, send to NRTLPROGRAM@dol.gov or to an address obtained from the staff of the program.

On the Web

These Application Guidelines, the SNAP Description, and NRTL Program Directive are available at the NRTL Program's web site, which can be accessed by selecting the letter "N" in the "Subject Index" at <http://www.osha.gov>.

Instructions for Completing the SNAP Application

General Instructions

Provide information for every item contained in each part of the three parts of these guidelines, even if only to provide proper references or to note that it is not applicable. Information and documents you provide for your application must be in English, unless otherwise accepted by OSHA. You may insert the text of your information in the appropriate spaces following each item in these guidelines, or provide the related information on one or more separate attachments. You may submit your application electronically (by e-mail, or on a disk or other electronic storage device) or as a hard copy. If submitting electronically, complete using Word or other compatible word processing programs, and provide a signed original of the SNAP General Application Information, with any submitted disk/device or copies of any attachments. If submitting in hard copy, send a cover letter and one original of your application to the address shown in the Overview section. However, OSHA may request, and you will need to provide, two more copies of the complete application. Contact the NRTL Program staff if you have any questions. **Note: OSHA must approve your application before formally accepting your use of SNAP sites to perform the functions or testing activity permitted in the SNAP Description.**

The three parts of these guidelines for providing information, the first of which begins on page 6, are:

1. General SNAP Application Information

- Provide all information requested. Attachments should be numbered and labeled, referencing the numbering on the General SNAP Application Information sheet. The legal signatory must sign in the space provided.

2. SNAP Site Information

- For each SNAP site, provide the information shown in the SNAP Site Listing format. Other formats may be used if the same or equivalent information is provided. Also attach supporting documentation demonstrating that each site meets the definition of a SNAP site, as shown in the SNAP Description.
- Be sure to identify the scope of qualification (program scope and technical scope) of each SNAP site.

3. Detailed SNAP Information/Evaluation Criteria

- Provide information for every item under each of the categories. Each category represents a critical component for meeting the terms of SNAP.

Complete Application

In order for your application to be complete, it must include the completed General SNAP Application Information, SNAP Site Listing, and Detailed SNAP Information/Evaluation Criteria formats, or equivalent information, **and the following supplements:**

- Organizational chart(s) (for the NRTL's SNAP operations showing the organizational unit responsible for managing these operations and the unit(s) responsible for auditing.
- Completed Evaluation Report for up to three SNAP sites, or, if none have been qualified, the template to be used for these reports.
- Schedule for auditing the sites already qualified for the program during an 18-month period starting from the date of the application. Also provide the name(s) and location of current SNAP auditors.
- Names and resumes of the NRTL personnel responsible for managing its SNAP operations and for performing audits of SNAP sites.
- NRTL's Quality Manual or other operational documents that represent the NRTL quality assurance program that will control the NRTL's SNAP operations. References to the documents representing the policies and procedures covering the broad areas of this program, including security planning, product handling and control, test equipment calibration and handling, or records review and storage.
- Documents containing the policies and detailed procedures for the NRTL's SNAP site qualification program and site audit program which meet the criteria in paragraphs II.C and II.D of OSHA's current SNAP Description.
- References to other standard operating procedures (including work instructions) for the testing,

Instructions for Completing the SNAP Application

certification, and other activities that a SNAP site can perform.

➤ For each SNAP site, documents demonstrating that the site meets the “Definition of a SNAP Site”.

If the quality manual or procedures, or any other policies and procedures requested above were submitted to us recently (e.g., as part of an application), and they adequately address the applicable terms and conditions in the SNAP Description, you do not need to submit them when applying for SNAP. Instead, identify the document(s) and date(s) submitted. In addition, if the documents requested above are extensive and cannot be readily provided through e-mail or an electronic storage device, only provide a list of the documents. You will then need to provide any of these documents that OSHA requests.

Attach any other documents that will assist the OSHA staff in better assessing your application. Any additional documents submitted should be for illustration or clarification, and not in lieu of the information requested. In addition, clearly label and reference each attachment to the application itself.

Amendments

You may amend your SNAP application at any time prior to OSHA’s final decision; however, late amendments may delay this decision.

Approval or Denial to use SNAP

OSHA will notify you in writing of its decision on your SNAP application, and, if denied, provide the reasons for non-approval. You may reapply at any time for approval to use SNAP. If not approved to use SNAP, the NRTL may only perform SNAP functions at its recognized sites, and the SNAP testing activity only at a recognized site or a qualified site wholly owned by the NRTL.

Expansion, modification, or deletion of SNAP site or SNAP elements

After receiving approval for SNAP, an NRTL must submit to OSHA any changes to the NRTL’s site qualification program or site audit program. OSHA must accept such changes prior to their implementation by the NRTL. The NRTL must also notify OSHA in writing within 30 days of any new SNAP sites or changes to its existing SNAP sites. See current SNAP Description for a listing of the type of information that must be submitted.

Addition, expansion, modification, or deletion of a SNAP site

- For new sites, provide the information on the site and include the updated 18-month audit schedule. For changes to existing sites, update the affected information shown in the NRTL’s listing of SNAP site information, making clear what information has changed. Also include any changes to the 18-month audit schedule if affected by these changes.
- For new SNAP sites, and for expansion or modification of a SNAP site’s capability, submit a copy of the audit report that adequately addresses the site’s capabilities, activities, and functions under the SNAP.
- For a new site and for existing SNAP sites that have changes in their legal structure or ownership, the NRTL must submit documentary proof that the site meets the SNAP site definition.

Modification of SNAP elements

- After receiving approval for SNAP, submit to OSHA any changes to the documents underlying the NRTL’s site qualification program or site audit program. OSHA must accept such changes prior to implementation by the NRTL.

Fees

When applying for SNAP, submit the SNAP application fee identified in OSHA’s NRTL Program Fee Schedule, or if no such fee is shown, submit the fee for the Supplemental Program Review. OSHA will charge fees for the auditing it performs concerning SNAP using the fee schedule (for auditing functions at regular sites) in effect at the time of the audit.

Instructions for Completing the SNAP Application

SNAP Description

OSHA's terms for using SNAP are governed by the latest SNAP Description and NRTL Program policies, procedures, or guidelines that are applicable to the NRTL's SNAP operations.

Legal Signatory

The legal signatory signs the application and any amendments. The legal signatory(s) of the applicant is recognized by OSHA as the individual responsible for submitting the application, and who can legally bind the applicant to the conditions and requirements for SNAP. The legal signatory is the applicant's official contact for OSHA. To change the legal signatory, the current legal signatory (or an individual that can legally bind the organization) sends a letter to OSHA regarding the change.

General SNAP Application Information

Please provide the following information about the applicant's SNAP-related operations.

General Information

1. Legal name of NRTL:	
2. Street address of NRTL's SNAP Headquarters:	
a. Mailing address (if different):	
3. Name of Unit or Area Responsible for SNAP Operations:	
a. Name and Title of Manager:	
b. Street address:	
c. Mailing address (if different):	
d. Telephone and fax numbers:	
e. E-mail address:	
4. Name of Unit or Area Responsible for Auditing SNAP Operations:	
a. Name and Title of Manager:	
b. Street address:	
c. Mailing address (if different):	
d. Telephone and fax numbers:	
e. E-mail address:	
5. Legal Signatory (include phone and fax numbers, and email address) if different from 3a above	
6. Alternate contact (include phone and fax numbers, and email address) if appropriate	
7. Name(s) and location(s) of SNAP auditor(s):	
8. Additional Information (if needed):	

Statement on Terms of Recognition

As legal signatory for _____, the applicant, I attest that all statements and information contained in our SNAP application are correct to the best of my knowledge and are made in good faith. We agree to comply with all of the terms in the SNAP Description and agree to perform our SNAP-related operations only within our approved scope of recognition, following the policies, procedures, structures, and practices described in this application or amended application accepted by OSHA, or in appropriate revisions we make after recognition. We further agree to promptly submit details to OSHA of any major changes in those operations and the documents underlying these operations.

Legal signatory (Type or print Name, then sign and date within the space provided)

SNAP Site Information

SNAP Site Listing

For each SNAP site, provide the information shown below. Space has been initially provided for listing 2 SNAP sites, using a tabular format. List additional SNAP sites by inserting a table at the insertion point shown below. (To add a table, select all rows of an existing blank table, and, in the top menu, select Edit, then Copy. Next, place cursor at insertion point shown below, and select Edit, then Paste.) Note: Other formats may be used if the same or equivalent information is submitted.

1. Name of SNAP Site:	
a. Street address:	
b. Mailing address (if different):	
c. Name and Title of Manager:	
d. Telephone and fax numbers:	
e. E-mail address:	
f. SNAP Function(s) Qualified to Perform:	
g. Product Testing Activity Qualified to Perform (provide name(s) of test standard(s):	
h. Date Site First Qualified:	
i. Date of First Site Audit:	
j. Date of Next Audit (or refer to audit schedule, if provided):	
k. Documentary Proof for SNAP Definition:	

2. Name of SNAP Site:	
a. Street address:	
b. Mailing address (if different):	
c. Name and Title of Manager:	
d. Telephone and fax numbers:	
e. E-mail address:	
f. SNAP Function(s) Qualified to Perform:	
g. Product Testing Activity Qualified to Perform (provide name(s) of test standard(s):	
h. Date Site First Qualified:	
i. Date of First Site Audit:	
j. Date of Next Audit (or refer to audit schedule, if provided):	
k. Documentary Proof for SNAP Definition:	

INSERT TABLE FOR ADDITIONAL SITES BELOW.

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Detailed SNAP Information/Evaluation Criteria

BASIC INFORMATION

Outlined below, by major SNAP area, are the criteria that OSHA will use to evaluate whether an applicant meets the term(s) or condition(s) for using SNAP, either initially when applying for approval to use SNAP or, after receiving this approval, when notifying OSHA of subsequent modifications to the NRTL's SNAP operations. Each criterion describes operational elements that must be met in order to meet the corresponding term or condition specified in the SNAP Description. **Provide or reference the necessary detailed information that explains how each criterion or, if none, how each term or condition will be met. Include references to, or otherwise describe, the policies, detailed procedures, methods, personnel, or practices that are pertinent to meeting the criterion.** If not applicable or information is not available, please so state. If a criterion is applicable but not fully met, explain why you cannot comply. The information you provide should be adequate and related to your planned (if not yet approved) or actual (if approved) operations under SNAP. General references and cross referencing may be used, where appropriate.

If using a word processing program, insert the text of your information following each criterion or the list of evaluation criteria for the category. If submitting your application in hard copy, provide your information on a separate attachment.

Outline level examples: I. Major SNAP Area (Paragraph II.C or II.D in the SNAP Description)
A. Category of SNAP terms and conditions
1. Criterion for evaluating conformance to SNAP term(s) or condition(s)

I. Site Qualification Program

A. Detailed Procedures for Granting, Renewing, Modifying, or Revoking Site's Qualification

1. An application document or other record is completed when qualifying a site. This record shows the site's name and location, name of site's manager and organizational unit, and, as applicable, the SNAP function(s) and SNAP testing activity(ies) to be performed.
2. After qualifying a site, the record(s) maintained for the site's qualification is updated with the date of the qualification or, if the site is not approved, the date of denial and a reason for the denial.
3. The NRTL completes a document or other record showing how it evaluated each site's qualification, and it clearly identifies the specific criteria for each area or element being evaluated for each SNAP Function or SNAP Testing Activity.
4. Procedures for granting a site's qualification require that the evaluation document demonstrate the site met all applicable criteria, and that the document be approved, at a minimum, by the SNAP auditor, the auditor's immediate supervisor, if any, and authorized personnel at the SNAP headquarters or regional SNAP headquarters.
5. Procedures for renewal of a site's qualification meet criteria 1 to 4 above, but substituting the word renewing or renewal for qualifying or qualification, respectively.
6. Procedures for modifying a site's qualification meet criteria 1 to 4 above, but substituting the word modifying or modification for qualifying or qualification, respectively.
7. Procedures for revoking a site's qualification require completion of a document or record explaining the reason(s) for revocation, the function or activity deleted, and the effective date of the revocation. The procedures also require approval of the document, at a minimum, by the SNAP auditor or other authorized staff, and authorized personnel at the SNAP headquarters or regional SNAP headquarters.

B. Detailed criteria to grant a site's qualification

1. Criteria address both its capability (including proper equipment, written procedures, and qualified staff) to test and/or evaluate a product with respect to the requirements in a standard (i.e., technical

Detailed SNAP Information/Evaluation Criteria

capability) and its capability to perform any of the proposed SNAP functions (i.e., program capability).

2. Criteria are in place to renew, modify, or revoke a site's qualification.
3. A listing is provided showing the NRTL's or NRTL applicant's personnel responsible for the site qualification program.
4. Detailed procedures are in place for notifying OSHA of the initial qualification of a site, including its location and scope of qualification, of any changes in the site's location or scope, and of any changes to the site's qualification status (e.g., renewal of qualification).

II. Site Audit Program

A. Detailed audit procedures for evaluating a site's program capability and technical capability, as applicable.

1. Procedures or guidance is in place for auditing each SNAP Function or SNAP Testing Activity.
2. The audit report identifies the SNAP site audited, the date of the audit, the name and location of the SNAP auditor, the area(s) or elements reviewed, the finding, if a nonconformance, the criteria that is not met. Corrective actions are identified in the report or on other permanent record, which show the date they were implemented.
3. Procedures require that the audit report be signed by the SNAP auditor and the manager of the audited SNAP site, and that it is approved by the SNAP headquarters or regional SNAP headquarters.
4. The audit must review a sample(s) of the final records or documents (if applicable) generated when performing each SNAP function to ensure that all the required steps have been adequately performed.
5. The procedures must require a root cause analysis of the adverse findings of any audit that ensures that corrective action eliminates the recurrence of the problem(s) identified.
6. A tracking system must be in place to ensure that problems are corrected in a timely manner. The SNAP auditor and headquarters must monitor corrective actions to ensure that they are being implemented and that they are achieving the desired results.

B. Policies or practices necessary for site audit program

1. Policies require that an on-site audit be performed at a potential SNAP site to pre-qualify it for its program and technical scopes ("initial qualification"), as applicable, and to pre-qualify it for an expansion or modification of its scope.
2. Policies require that each existing SNAP site performing SNAP functions undergo a minimum of two on-site requalification audits every 12-month period. Each audit must review all aspects of the site's SNAP operations and confirm that the site still possesses the capabilities for its existing program scope and technical scope at the time of the audit.
3. Policies require that each existing SNAP site performing only SNAP product testing undergo a minimum of one on-site requalification audit by the NRTL every 12-month period. This audit must review all aspects of the site's SNAP operations and confirm that the site still possesses the capabilities for its existing technical scope at the time of the audit.
4. Policies require that all audit documentation be maintained or available at the audited site, at the one recognized site designated by the NRTL as its "SNAP headquarters," and, at the site where the auditor is located, if not the SNAP headquarters. The overall auditing function of the NRTL's SNAP operations must be administered from the NRTL's SNAP headquarters.
5. The NRTL or applicant must have a documented program for training and qualifying auditors to audit the program capability, the technical capability, or both of these capabilities of a site's SNAP operations ("SNAP auditor"). Such a program must include an in-depth review of the relevant audit

Detailed SNAP Information/Evaluation Criteria

procedures and successful completion of a minimum number of supervised audits before the auditor may perform audits alone.

6. SNAP auditors must be independent of the site audited. The auditor cannot be under the control or direction of any SNAP site and may only be located at a recognized site.
7. Detailed audit forms must be used (with space for narrative comments) for auditing the program and the technical capability of a site's SNAP operations and for demonstrating that all technical, program, and quality functions that are applicable at a site were reviewed comprehensively.