

**NSNY  
Quality Assurance  
Program  
for  
Health and Safety  
Audits**

**Revised: October 2007**



## **Quality Assurance Program Terminology**

### ***Audit***

A structured process used to verify the health and safety performance of a management system as compared to an industry accepted standard.

### ***Auditee***

An employer or organization being audited.

### ***Auditor***

An individual who has the qualifications and skill to measure H&S performance against a given standard.

### ***ATP***

NSNY Auditor Training Program.

### ***ARC***

Audit Review Committee.

### ***NSNY***

Northern Safety Network Yukon.

### ***YWCHSB***

Yukon Workers' Compensation Health and Safety Board.

### ***COR***

The *Certificate of Recognition* program is a health and safety partnership with the NSNY, YWCHSB, and industry. The COR is a voluntary program that is widely used as a pre-qualification requirement for many purchasers of construction services. An employer who successfully meets the program minimum requirements becomes COR registered in the territory.

### ***Employee***

An individual employed by a company or organization that is compensated for his/her services.

### ***Employer***

An employer that is being audited. Sometimes referred to as the auditee.

### ***H&S***

Health and Safety.



**Quality Assurance Program  
Policy  
for NSNY Audits**

The Northern Safety Network Yukon is dedicated to providing employers with quality advisory services throughout the territory. Through our awareness training programs and active partnerships, Yukon employers can reach a high level of health and safety excellence.

The NSNY is committed to maintaining health and safety excellence in Yukon workplaces through the development and implementation of a quality assurance program. Its focus is monitoring the quality of auditor training, compliance with audit protocol and corrective action follow-up. System-wide measurements will be used to assist employers with future health and safety initiatives.

NSNY encourages employers and employees at all levels to take an active role in the success of their safety management systems and our quality assurance program. Through this team approach to quality management, we all can make positive contributions to injury reduction in Yukon workplaces.

Melanie Pettefer, CRSP  
Manager

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Dated: \_\_\_\_\_



## NSNY Quality Assurance Program Roles and Responsibilities

### NSNY

- Managing the Quality Assurance program.
- Auditor Training Program design and updates.
- Liaison with both auditors and auditees.
- Conflict resolution relating to the audit program.
- Liaison with employers, workers and the YWCHSB regarding related industry issues.
- The review of audits.
- Maintain a current database on COR status.
- The control and security of audit documents.

### Employers

- To ensure conflicts of interest are avoided.
- To ensure audits are properly planned and scheduled.
- To ensure all areas are audited for *COR* registration.
- To foster a positive audit environment by assisting and co-operating with the auditor so that audit objectives can be met.
- To provide access to facilities and supporting information as requested by the auditor.
- **To actively participate in the COR program and maintaining a full-time company auditor on staff.**
- To develop corrective action(s) when required.
- To provide the NSNY with feedback on the audit process to assist with continuous improvement.

## Section 1: Program Objective

### Objective:

The quality assurance program is designed to ensure audits are performed in accordance with identified standards.

### 1.1 Scope

The audit quality assurance program applies to all employers, auditors and NSNY staff.

## Section 2: Auditor Training Standards

**Objective:** To establish pre-requisites and performance standards for auditor training.

### 2.1 Pre-Requisites for Auditor Training Program (ATP)

Participants shall have a working knowledge of health and safety program development, implementation and management. The NSNY *Principles of Health & Safety Management* course must be completed prior to enrolment in this program. Equivalencies may be granted upon review of written submissions (certification, course outline). Instruction will be provided by NSNY certified personnel.

### 2.2 Auditor Training Program Standards

Minimum standards for auditor training require trainees:

1. To attain a minimum of 80% average in classroom training (theory, practices, quiz).
2. To submit a self-audit **within 6 months** of completing the course. All audits are reviewed and must meet minimum standards before an Auditor Certificate is issued by the NSNY.
3. To repeat the entire Auditor Training Program when an un-acceptable self-audit is submitted within the 6 month timeframe.
4. Only the audits that are completed and submitted within the 6 month timeframe will be reviewed. Those received more than 6 months after training was completed, will be returned to the trainee without review. The trainee will be required to repeat the two-day program.

### 2.3 Maintaining Certification

To maintain current certification auditors will:

- ✓ Submit one internal or external audit annually for review by NSNY personnel, verification will be maintained on NSNY database.
- ✓ Attend the NSNY re-certification program every 3 years, prior to expiration date.
- ✓ Abide by the NSNY auditor *Code of Ethics* at all times.

An industry accepted practice for companies with more than one certified auditor would be to submit one audit listing all auditors involved in the audit process for auditor or COR maintenance. Auditors must maintain their own certification.

### 2.4 Code of Ethics for NSNY Auditors

Auditors must strive to maintain a high level of professional conduct at all times. To ensure that quality audits are consistently performed auditors must:

- Maintain sound judgment in pursuance of their duties.
- Maintain the highest standards of honesty and integrity.
- Ensure that information is accurately interpreted and communicated.
- Ensure that information is safeguarded and kept confidential at all times.
- Ensure that information is based on objective findings and free of bias.
- Maintain quality standards through professional development.

Auditor candidates are required to sign the Code of Ethics when attending NSNY Auditor Training Programs (two-day and re-certification).

### 2.5 Independent Auditors

Independent consultants who have completed auditor training through NSNY or other recognized agencies must:

- Be able to provide proof of current auditor certification.
- Only use the NSNY audit instrument to measure employers for COR maintenance.
- Abide by the NSNY auditor *Code of Ethics* at all times.

**Employers must have prior approval of auditors retained (hired) for COR audits using the NSNY audit instrument.**

### 2.6 Program / Course Review

The NSNY will perform annual internal reviews of course material. The NSNY will revise the course materials and audit instrument when changes to the audit standards are made.

## 2.7 Qualifications

Courses will be instructed by NSNY certified personnel who undergo evaluation on a yearly basis. Competent personnel are selected based on requirements which consist of:

- CRSP designation, or
- Construction Safety Officer Certification, or
- Graduation from a recognized Occupational Health & Safety Program, or
- A Trades Certificate
- Related safety education with a minimum three years experience.

In addition, all instructors go through a three stage process to qualify as an instructor for any NSNY course consisting of:

- Observation of an existing instructor.
- Team Teach and evaluation with an existing instructor.
- Full Teach while being evaluated by an existing instructor.

Audit reviewers will possess the above qualifications.

## **Section 3: NSNY Audit Review Committee (ARC)**

**Objectives:** To establish audit guidelines for industry that meets the requirements of the partnership audit standards.

### **3.1 Role and Responsibilities**

The Audit Review Committee is comprised of representatives from industry, the NSNY and the YWCHSB. Their responsibilities include:

- Review of industry audit standards.
- Recommending changes and new initiatives for Yukon workplaces.
- Reviewing breach of code of ethics, appeals and recommending corrective/disciplinary action for auditors and/or auditees.
- Auditor training program review.
- Review and update of industry audit documents as required.
- Periodic review of audit process.

### **3.2 Member Selection**

Representatives on the Audit Review Committee will be selected according to the following criteria:

- One worker volunteer from a COR certified company safety committee.
- One individual appointed by the Yukon Contractors Association.
- A representative from YWCHSB.
- The NSNY Senior Auditor or designate.

### **3.3 Committee Submissions**

Audit Review Committee representatives who are unable to attend a meeting may respond to agenda items through written submissions to the ARC Chairperson.

## Section 4: Process Control for External Audits

**Objective:** To establish process controls for audits.

### 4.1 Eligible Employers

Any employer with an active Yukon WCHSB account is entitled to use the NSNY Audit system.

### 4.2 Pre-Requisites for External Audits

Before the external audit may proceed the employer must have:







- i. Completed and submitted the *COR* application.
- ii. Have at least one **full-time employee** complete; *Principles of Health & Safety Management, Auditor Training Program (Certification), Leadership for Safety Excellence* and one of the following Train the Trainer programs – *WHMIS*, or *Flagperson*, or *TDG*.
- iii. An implemented/established H&S program.
- iv. **Have an active work site available for the audit.**

### 4.3 Health & Safety Program Review

When requested, NSNY Advisors will review the employer H&S program for content and provide feed-back for improvement.

### 4.4 Audit Request

The employer (auditee) must contact the NSNY when ready to proceed with the external audit. The NSNY will require:

-  The current employer legal name as registered with the corporate registry.
-  The current address, phone/fax number and key contact.
-  The employer WCHSB account number(s) and industry code(s).
-  The location(s) of the active work site(s).
-  The number of workers at peak times and number at time of the audit in order to assure a representative sample is achieved.
-  Complete and submit the “Site Assessment for External Audit Process”.

**The employer must have an active work site(s) for this external audit to proceed.** It is the sole responsibility of the employer to schedule the audit during active, medium to peak work periods.

#### 4.5 Auditor Selection by NSNY

NSNY will provide the employer with a list of certified auditors the employer may select from. The employer selects an auditor and informs the NSNY of their selection. NSNY will contact the auditor to ensure availability. Both auditor and employer will be interviewed by NSNY to ensure conflicts of interest are avoided. These conflicts include, but are not limited to, the following issues:

- **auditor was directly involved in setting up the company's health and safety program,**
- **auditor was a past employee of the company within the last year,**
- **auditor's company is a sub-contractor to the company,**

#### 4.6 Audit Costs

Employers are responsible for paying the auditor and their expenses. It is the responsibility of the employer to pay for the NSNY Audit document.

#### 4.7 Post-Audit Questionnaire

The NSNY Post-Audit Questionnaire is completed by the employer. The intent of this questionnaire is to provide NSNY with information regarding the audit process from the employers' perspective.

### Section 5: Industry Audit Document Selection

**Objective:** To establish guidelines for proper audit document selection.

#### 5.1 NSNY Audit Document Selection

There are two NSNY Audit Instruments designed for the construction industry. Selection is based on the total number of staff including other employers or contractors. The following applies:

1. Small Business Form            less than 10 employees.
2. Standard Audit Document    more than 10 employees.

#### 5.2 Non-Industry Audit Documents

Employers must use the NSNY audit document in order to achieve a Certificate of Recognition through the Northern Safety Network Yukon.

## Section 6: Audit Approvals

**Objective:** To set minimum performance standards for NSNY Audits.

### 6.1 Audit Submission

**The employer is responsible for submitting the completed original audit document and the *Post-Audit Questionnaire* to the NSNY within 45 calendar days of the completion of the audit.** Original documents must be completed in **ink**. Photocopies will only be accepted if the original copy has been lost or when corrections are requested.

### 6.2 NSNY Audit Review

All audits will be reviewed by qualified NSNY staff.

### 6.3 Minimum Rating for COR Audits

To meet the COR standards the external/internal audit must:

- ✓ Attain a 80% overall score; and
- ✓ Attain a minimum of 50% in each element; and
- ✓ Meet the established quality assurance standards of both NSNY and YWCHSB

### 6.4 Quality Audit Protocol

Quality audit protocol requires completed documents to be:

- In ink, neat and free of errors.
- Added correctly.
- Justifying all non-applicables (N/A) in the comment sections following each element or in the auditor's executive summary.
- Providing meaningful feed-back for continuous improvement in a complete written auditor executive summary report that parallels scoring.

### 6.5 Final Audit Review for COR

When the external audit meets industry standard the NSNY will advise YWCHSB for issuance of the Certificate of Recognition.

### 6.6 COR Accreditation

COR will be issued when all requirements have been met. The certificate is jointly signed by NSNY and YWCHSB.

## 6.7 Changes to Existing COR

If an employer expands its scope of operations, they may request COR registration for the new division through NSNY. NSNY will advise the employer what necessary documentation is required and forward same to YWCHSB for approval. When there is a significant change in the scope of work, YWCHSB may require new certification. ***The following documentation is required prior to the issuance of any changes to the COR:***

- *Copy of the employers registration with the Corporate Registry that indicates the ownership remains the same as the COR holder(s).*
- *A letter from the employer that shows:*
  1. *The establishment of a YWCHSB account indicating the number and industry code.*
  2. *A letter describing the type of work being done by the new division or company.*
  3. *Verification that the Health & Safety Program used is the same as when the original COR was issued.*

## 6.8 Changes in ownership

The following criteria will be used to determine if a change in ownership or management will affect a companies COR.

- 51% or more continued ownership. The ownership of a business generally determines the approach to occupational health and safety. If the ownership continues at 51% or more the COR should be continued.
- Where there is not a 51% or more continued ownership, COR status will be reviewed and new certification may be required. Exemptions to this rule may be granted if the business operations remain substantially the same and the following situations arise:
  - The business ownership is relatively removed from the day to day operations of the company and does not supervise staff and/or make management decisions (as is the case with large publicly traded organisations).
  - The change is among existing owner(s). This includes changes in partnership composition, a sole proprietor or partnership incorporating, a corporation changing to a partnership or sole proprietor, or changes between a partnership and a sole proprietorship. At least one related person remains after the change and business operations remain substantially the same.
  - The new ownership is a family member of the prior owner. Factors to be considered include whether the undertaking remains the same, the new ownership has been historically involved and whether the previous ownership is still active in the business.

In all cases where there is a change in ownership and/or senior management the new senior person must review the company safety policy and either sign and adopt it as is or make the necessary changes to reflect current company health and safety management beliefs.

## 6.9 COR Maintenance

COR is maintained through combined external and internal progress audits. The following maintenance schedules are in place:

- ⌚ Internal *progress* audit in the 2<sup>nd</sup> year.
- ⌚ Internal *progress* audit in the 3<sup>rd</sup> year.
- ⌚ External *progress* audit in the 4<sup>th</sup> year.

The audits must be completed prior to the anniversary date. Requests for extensions for the internal audits timeframe ONLY must be made in writing to the NSNY. When an employer has allowed their COR to expire, it is the responsibility of the employer to re-apply into the program.

### 6.10 Temporary Letter of Certification (TLC)

The NSNY will perform administrative audits and will issue a *Temporary Letter of Certification* (Valid for a specified time-frame) upon request, provided:

- ⇒ The employer has completed and certified in all COR training courses.
- ⇒ The employer has had a NSNY Advisor review the Health & Safety Manual and confirm that all elements are in place.
- ⇒ An active worksite is **not** available to complete the audit process, or
- ⇒ For bidding purposes, the external audit cannot be completed due to the construction season slow down or auditor availability or labour strife.
- ⇒ A temporary letter of certification has not been previously issued.
- ⇒ An extension has not been granted within the previous 12 months.

NOTE: The administrative audit does not verify the implementation and performance of the entire H&S management system only its content.

### 6.11 Temporary Letter of Certification Restrictions

The *TLC* will **NOT** be issued when:

- The program does not meet the administrative audit requirements.
- An active worksite is available to complete the audit process.
- The company has previously received a *TLC* and it has expired.
- The company failed to request an audit prior to the *TLC* expiring.

In order for a company to re-apply for a temporary letter of certification, a period of 12 months must elapse between the expiration date of the old *TLC* and the requests for a new *TLC*.

### 6.12 Temporary Letter of Certification Extensions

Extensions will be issued at the discretion of the NSNY up to a maximum of the original time frame of the *TLC* (90 or 180 days). The employer must submit a written request for an extension, signed in the presence of a Commissioner for Oaths or a Notary Public, to the NSNY:

- That explains the reason(s) for applying for the extension.
- That explains an active worksite was not available for completion of the audit process within the time-frame specified in the *TLC*.

**NOTE:** If it can be shown that an active worksite was available and the audit was not undertaken, the TLC will be revoked.

*The NSNY may grant an extension to the Temporary Letter of Certification to those employers that have submitted their external audit for certification and the audit is in the review process.*

## Section 7: Failure to Attain Minimum Audit Score

**Objective:** To establish protocol for audits that fail to achieve the minimum score.

### 7.1 Below Standard COR EXTERNAL Audit

Employers should contact the NSNY when the audit does not meet minimum standards. Audits that do not meet standard but achieve 70% or higher overall score and/or below 50% in two or less elements may qualify for a **limited scope audit**. **(Employers whose external audit fails to meet the minimum audit score and qualify for the limited scope audit will undergo a “Review of COR Holder’s Health & Safety Program – Appendix C” and must have their entire health and safety program re-audited.)**

When employers qualify for a limited scope audit the NSNY will send a letter requesting an action plan to correct the deficient areas of the safety program. This action plan must be received by the NSNY within 45 calendar days from the last day of the audit. If the NSNY accepts the action plan, a limited scope audit will be set-up to re-evaluate the deficient areas. Where practicable, the same auditor will conduct the audit. The limited scope audit must take place within 90 days of the original audit date. Failure to meet any of these requirements may result in the initiation of the “Review of COR Holder’s Health & Safety Program – Appendix C” or denial of COR.

Employers that fail to meet the minimum requirements for re-certification within the timeframe (90-days) and lose their COR as a result, cannot reapply for COR or apply for a Temporary Letter of Certification for a period of 12 months from the COR expiry date.

Failure to submit an external audit by the anniversary date will result in beginning the “Review of COR Holder’s Health & Safety Program – Appendix C” and may result in an employers COR being revoked.

#### 7.1.1 Failure to Submit Action Plan

Failure to submit an action plan within 45 days from the last day of the audit may result in the initiation of the “Review of COR Holder’s Health & Safety Program – Appendix C” or denial of COR.

#### 7.1.2 Failure to Request Re-verification

Failure to request a re-verification of below standard elements may result in the initiation of the “Review of COR Holder’s Health & Safety Program – Appendix C” or denial of COR.

### 7.2 Below Standard INTERNAL Audits

Internal audits submitted to NSNY for approval must meet established protocol and minimum score (*Refer to 6.3*). The employer must submit a written action plan within 30 days when audit standards are not achieved. Upon receipt of the action plan a meeting will be arranged between the manager (or designate) of the NSNY and the employer to review the action plan and ensure expectations and outcomes are clearly understood.

### **7.2.1 Action Plan**

Failure to submit an action plan within the 30 days may result in initiation of the “Review of COR Holder’s Health & Safety Program – Appendix C”.

Content:

The action plan should be signed by senior management and address:

- ✓ Identified H&S program weaknesses.
- ✓ Prioritization of concerns identified.
- ✓ Proposed corrective actions including a description of short term and long term strategic plans.
- ⊕ Targeted implementation schedules.

This plan must be submitted to NSNY for review and approval when the minimum standard has not been attained.

### **7.2.2 Failure to Submit Internal Audit**

Failure to submit an internal audit by the anniversary date will result in the initiation of the “Review of COR Holder’s Health & Safety Program – Appendix C” and may result in your COR being suspended or revoked.

## Section 8: Auditor Non-Conformance

**Objectives:** To establish guidelines for acceptable auditor performance.

### 8.1 Incomplete Audit Submission

The NSNY will attempt to contact the auditor when an incomplete audit has been submitted. The NSNY will not change an audit score without attempting to contact the auditor for discussion and agreement on proposed changes. The Audit Review Committee may become involved if agreement to changes is not achieved. The role of the NSNY is to provide guidance regarding audit protocol. Significant deviations identified may result in audit rejection and/or auditor interview which may result in retraining.

### 8.2 Perceived Conflicts of Interest

When perceived conflicts of interest arise these concerns will be directed to the NSNY manager for review and investigation.

### 8.3 Conflicts of Interest

Auditors must avoid conflicts of interest at all times. These conflicts include, but are not limited to, the following issues:

- An external auditor who has had direct input into the auditee's Health & Safety program development within the 12 months prior to the audit.
- An external auditor who stands to gain financially through recommendations made prior to audit close-out and report submission.
- An external auditor who, through a business relationship, may be perceived to be in conflict.

Conflicts of interest will be reviewed by the NSNY manager and discussed with the auditee and the auditor. When warranted, the auditor and employer representative may be required to attend an Audit Review Committee meeting to review the findings. When a significant conflict of interest is verified, the NSNY may initiate a re-verification audit. COR may be revoked until the re-verification audit is complete.

**NOTE: The NSNY recommends that the same auditor not be used by the same company for consecutive external audits in order to avoid any perceived conflict of interest.**

### 8.4 Breach of Auditor Code of Ethics/Conflicts of Interest

When the NSNY determines that an auditor has intentionally breached the auditor Code of Ethics, auditor de-certification will occur. This may also result in audit rejection and re-audit of the entire Health & Safety program by an independent auditor, costs to be borne by the employer.

## 8.5 Appeal Process

An appeal may be launched by the de-certified auditor, in writing. The appeal must be directed to the Chairperson of the Audit Review Committee.

## Section 9: Employer Non-Conformance

**Objective:** To establish uniform audit guidelines for employers.

### 9.1 Failure to Use Correct Audit Document

When an employer uses an incorrect audit document, the NSNY reserves the right to review the findings and recommend corrective action(s) or reject the audit. If the NSNY is unable to resolve this issue the findings will be reviewed by the Audit Review Committee.

### 9.2 Regulatory Non-Compliance

When an employer has been found in violation of the Occupational Health & Safety Act, the Director of OH&S may initiate the "Review of COR Holder's Health & Safety Program – Appendix "C". This could result in:

- Granting an extension to a Temporary Letter of Certification (TLC),
- A re-verification audit, or
- *Revoking of an existing COR.*

### 9.3 Fatalities, Serious Incidents and Injuries

When an employer has experienced a fatality or fatalities, serious incident and/or injuries, Yukon Workers' Compensation Health and Safety Board's "Review of COR Holder's Health & Safety Program – Appendix "C", process will begin.

It is the responsibility of the YWCHSB to initiate the process.

## Section 10: System Complaints

### 10.1 Complaints

Complaints regarding the audit process or employer COR are to be directed to the NSNY in writing. Complaints will be addressed by the NSNY manager with stakeholders and this may include representatives from WCHSB and the ARC.

**Objectives:** To establish guidelines for the control and processing of audit documents.

### 11.1 Audit Review

All audits submitted to NSNY will be reviewed by NSNY personnel (refer to qualifications 2.7). The NSNY will not change an audit score without attempting to contact the auditor for discussion and agreement on the proposed changes. Disagreements on changes will be forwarded to the Audit Review Committee.

### 11.2 Release of Information

All audit reviews and performance ratings are strictly confidential in compliance with the privacy act. These findings will not to be released to members or anyone outside of the NSNY, except YWCHSB. Any inquiries regarding employer COR accreditation shall be directed to NSNY.

### 11.3 Retention of Records

Audit documents are confidential and will be kept on file for 3 years. The self-audit document used for auditor certification will be reviewed, the score recorded and the document returned or destroyed.

### 11.4 Audit Reviewers

The audit reviewers will be NSNY personnel (refer to qualifications 2.7) and the same "code of ethics" shall apply to them as for NSNY certified auditors. All information contained in the audit document is strictly confidential and it shall not be discussed, copied or passed on to anyone outside of the NSNY except upon request by YWCHSB or the auditee.

### 11.5 Database Information

NSNY will maintain the following records on their computer database:

#### **Employer Information:**

- Name of employer as well as subsidiary name
- Address
- Contact Name
- Telephone/Fax number

#### **Certificate of Recognition information:**

- WCHSB Account and Industry Code number issued to COR.
- Audit Date
- COR number
- Expiry Date
- Auditor name

## Section 12: Out of Territory COR

### 12.1 Out-of-territory COR Equivalency

For employers that have attained their provincial Health & Safety certification and are applying for equivalency to the Yukon COR program to bid in the territory, the requirements are:

- Submission of a copy of the summary of their most recent external audit.
- Submission of a copy of their provincial certificate or letter of accreditation.
- Submission of a letter of good standing from their construction safety association regarding COR standing.
- Submission of a copy of their health & safety manual for review.

Once the above has been submitted and reviewed, the NSNY will issue a Certificate of Recognition Equivalency letter (COREL) valid for a one year period.

**Once a worksite or YWCHSB account is established an external audit must be arranged. The audit must be performed within 60 days of establishing a worksite. If successful, a three year COR will be issued.**

Note: Unsuccessful bidders will receive a new COREL, upon request, for bidding again in Yukon when the original COREL has expired. For those employers that achieve the Certificate of Recognition, they are required to maintain their COR according to NSNY requirements.

An out of territory contractor may elect to have an external audit conducted on a worksite outside of Yukon using a NSNY approved audit document and external auditor. If successful a three year COR will be granted to this company.

### 12.2 Temporary letter of Certification (TLC) – Out-of-Province

The requirements for out-of-province employers applying for a Temporary letter of Certification are:

- Submission of their Health & Safety program (Safety Manual) along with review fees for an administrative audit review by NSNY personnel to ensure it meets industry standard.
- Registered in, or completion of the required four core courses by a full-time employee, or
- Application for and granted equivalency for one or more of the required courses.

### 12.3 Temporary Letter of Certification Extensions – Out-of-province

For the out-of-province employers applying for an extension to a TLC, only **ONE** extension will be granted on the condition that one **FULL-time** employee register and actively participate in the required core courses.

### 12.4 Maintenance of COR Certification

The employer must maintain their certification according to NSNY requirements contained in this quality assurance document.

