

i-SIGMA Multi-Location Certification Program (for Companies with 3-24 Branches)



Program Overview

Qualifications for Program

In order to qualify for the program, an applicant must have at least three (3) destruction and/or RIM locations and must be committed to achieving 100% compliance with the i-SIGMA Certification specifications at **all** information destruction-related and/or RIM locations and agreeing that all such facilities will be subject to the scrutiny of audits on an i-SIGMA Chapter basis.

Fees

Branches will be audited at the standard Certification fee(s) as listed on the payment page in the most up-to-date version of the NAID AAA and/or PRISM Privacy+ application for the Operation and/or Destruction Type(s).

Where an Applicant's records are maintained in a centralized manner, and require a separate audit, there will be an additional annual Headquarters Audit for an additional fee.

Fees are to be paid at the time of the application submission.

Initial Application and Audit Process

A Headquarters Audit (if necessary) and audits of all of the locations are required for each location. (If participating in the Multi-Location Program 100% of all locations must be NAID AAA and/or PRISM Privacy+ Certified.)

i-SIGMA will notify the Company in writing when it has achieved Certified Company status. The Applicant may not make any reference regarding an enterprise-wide NAID AAA and/or PRISM Privacy+ Certification until they are in receipt of the official notice from i-SIGMA.

Re-Audit Process and Unannounced Audits

After successful completion of the initial application and audit process, and notification that the Company is Certified, the Multi-location Company will be audited as follows:

- a) One-third of the Company's locations shall be audited each year on a scheduled, announced basis. The selection of the locations shall be in a manner that all locations are audited over a 3-year period.
- b) All of the Company's locations are subject to unannounced audits.

This Multi-location Certification Program will not change without being mutually agreed upon between the Certification Committee and i-SIGMA. This limitation does not include any modification to an audit schedule that is made on a company-specific basis as a result of a series of a Company's transgressions over time.

The logic for conducting audits of less than all of a Multi-location Company's locations each year is that the number of locations audited (one-third on a scheduled basis, plus random unannounced audits of other locations) constitutes a representative sample of the Applicant's sites. Therefore, the enterprise-wide NAID AAA Certification status is dependent upon and measured by the **cumulative results** of each year's audits.

An audit failure of a single location within a Multi-location Company may result in the Company losing its Certified status. However, evidence of serious breaches of i-SIGMA standards (particularly breaches that might allow unauthorized access to confidential customer media) may lead to heightened scrutiny of the Company at the discretion of the Membership Resolution Council (MRC).

Non-compliance/Transgressions and Due Process

If the Membership Resolution Council (MRC) becomes sufficiently concerned over a pattern of transgressions at a Company because of results of audits, it may result in a recommendation to the i-SIGMA Board of Directors. The MRC would use the same due process established for all ethical transgressions in formulating its recommendations to the i-SIGMA Board of Directors. The i-SIGMA Board of Directors would ultimately decide to approve, modify or deny the MRC's recommendations. As the final element of due process, a member appeal of an i-SIGMA Board decision would be afforded to the Respondent in the complaint.

The MRC has the authority to require remedial actions to restore compliance to NAID AAA and/or PRISM Privacy+ Certification specifications. The primary purpose of the authority to require restored compliance with NAID AAA and/or PRISM Privacy+ Certification specifications is the protection of the clients and the reputation of the NAID AAA and/or PRISM Privacy+ Certification program. Therefore, the timeframe required by the MRC to make such adjustments is totally dependent upon the risk to the client and the reputation of the i-SIGMA Certification program as determined by the MRC. The MRC is also charged with establishing the precedents regarding when transgressions, or a pattern of transgressions, are referred to the MRC for disciplinary action. The MRC is ultimately responsible to see that due process is applied to all relevant situations, as well as establishing the precedents under which disciplinary action is warranted.