

National Park Service
U.S. Department of the Interior
Commercial Services Program



Environmental Audit Information for Concessioners

Agenda



- Scope of an environmental audit
 - Types of environmental audits
 - Environmental audit criteria
- Site audits
- Audit finding priority levels
- Post-visit process and timeline
- Final Audit Report
- Closing out the environmental audit
- Telephone audits
- Paper audits



Introduction to the Environmental Audit Program

- Who we are:
 - Concessions Environmental Audit Coordinator (WASO)
 - Regional concessions chiefs
 - Park concessions specialists
 - Contractor audit teams

- What we do:
 - Work with parks and concessioners to provide independent third-party environmental audits and compliance assistance



Scope of an Environmental Audit

- Facilities and services to be audited
- Audit type (i.e., site versus telephone or paper audit)
- Audit criteria
- Period under review
- Concessioner Tools and Information

Scope of the Audit



- Concessioner facilities located within park boundaries.
- Concessioner services and operations taking place within park boundaries.
- Concessioner services and operations taking place outside park boundaries that are specifically mentioned in the concession contract.

Environmental Audit Types



- **Standard audit:** Standard audits are consistent with Department of Interior (DOI) policy and the NPS Environmental Audit Program. They include a site visit and pre- and post-visit phases.

Environmental Audit Types



- **Non-standard audits:**
 - **Telephone/Paper audit:** Telephone and paper audits are the most common non-standard audit type and are used for Category III concessioners and some Category II concessioners. Telephone audits are conducted for new contracts to establish a baseline. Paper audits are conducted if a baseline (telephone) audit has been completed.
 - **Cruise Ship Audits:** Some concessioners (e.g., cruise ships) are subject to comprehensive environmental evaluations through a third-party auditor (e.g., U.S. Coast Guard) and that may serve in place of standard NPS Commercial Services environmental audit.

Environmental Audit Types



- **Conditionally exempt:** Some concessioners may not warrant an audit due to negligible potential for environmental impact. In these cases, the program collects sufficient information to justify and document these concession operations as conditionally exempt. Conditionally exempt justifications are verified at least every ten years.



Environmental Audit Criteria

- Federal environmental laws and regulations.
- Applicable Executive Orders (EOs).
- Applicable state and tribal environmental laws and regulations.
- Applicable regional and local environmental codes and ordinances.
- Applicable DOI, NPS, and park policies and procedures.
- Concession contract requirements (includes operating and maintenance plans).

Environmental Audit Finding Priority Scheme



- **Priority 1:** Findings represent non-conformance with laws and regulations that pose immediate, actual, or potential harm to human health or the environment, or the potential for significant liability exists. Liability may apply to concession or park staff.
- **Priority 2:** Findings represent non-conformance with laws and regulations that do not pose an immediate threat to human health or the environment.
- **Priority 3:** Findings represent non-conformance with EOs; DOI, NPS, or park policy; or contract requirements.

Isolated Findings



- Priority 2 and Priority 3 audit findings may be assigned an additional ranking of “isolated” if the observed non-conformances are not viewed as programmatic issues and are not pervasive throughout the concessioner operations.
 - This ranking is useful in prioritizing corrective actions and assigning readily available resources to close audit findings with a minimal level of effort.
 - Audit findings noted as “isolated” will be removed from the report if they are adequately addressed prior to the Final Environmental Audit Report being distributed.



Pre-Audit Process

- The Audit Team Leader (ATL) contacts the park Point of Contact (POC) to schedule the audit site visit and answer questions.
- The park POC will contact the concessioner to confirm the audit dates.
- Park POC will forward the blank audit questionnaire to the concessioner.
- If possible, provide the ATL with any appropriate documentation (concessioner written plans, waste disposal records, etc.) ahead of the audit to save time during the site visit.

Site Visit



- Focuses on an inspection of concession facilities, services, and operations.
- Concession staff and park POC must accompany the audit team.
- Is an opportunity to exchange information between the audit team, park staff, and concession staff. The audit team works to understand compliance issues and to identify best management practices (BMP) opportunities.
- A typical audit site visit is a day. Audits for multiple or complex concessions may take up to a week.

In Brief



- Short presentation to highlight the audit and site visit process (approximately 30 minutes).
 - This can also be done remotely the week before the site visit.
- Required attendees:
 - Concession POC
 - Concession environmental manager
- Recommended attendees:
 - Concession facilities manager
 - Concession general manager

Data Collection



- Physical observations include the audit team touring concession facilities and taking notes and photographs.
- Interviews with concession staff.
- Record and document review.
- The concessioner and park staff should ask questions. This is a chance to better understand compliance issues, corrective actions, and BMPs.

Exit Brief



- Presentation of preliminary audit findings.
- Separate exit brief presentations will take place for each concession operation.
- BMPs and exceptional practices observed during each individual concession site visit.
- ATL will schedule post-visit conference call to discuss preliminary findings.

Post-Visit Process



- Preliminary Audit Report is developed and submitted to the park POC who will forward it to the concession POC.
- Concessioner and park staff will be provided a Corrective Action Tracker (CAT) to submit comments on the Preliminary Audit Report to the audit team.
- Final Audit Report is developed and submitted to the park POC who will forward it to the concession POC.



Post-Visit Timeline

Within 3.5 weeks following the site visit:

- Preliminary audit report is developed and forwarded to park POC.
- Park POC reviews audit report and forwards to concession POC.
- Concession POC reviews audit report.

Within 5.5 weeks following the site visit

- Concessioner POC will identify and document isolated findings they don't agree with, have questions about, and completed corrective actions.
- Concession POC will be prepared to discuss questions and comments with audit team and present corrective action measures taken on isolated findings (if applicable).
- Park POC will confirm isolated finding closures (if any) and comment on concessioner staff comments in the CAT.



Post-Visit Timeline

Within one week following the comment call:

- The Final Audit Report and Report Memo will be drafted and submitted to the Commercial Services Program Chief.
- Once reviewed and signed, the memo and final audit report will be distributed.

Bi-monthly request for corrective action:

- Email request from Park POC for update on corrective actions.
- Park POC will forward the latest version of CAT to Commercial Services.

After 180 days of the issuance of the Preliminary Audit Report (deadline for closure of Priority 2 and 3 audit findings), NPS Commercial Services will request updates on corrective actions on an annual basis.

Comments on Preliminary Audit Report



- Concessioner and park are expected to provide comments on the preliminary audit report.
- During the comment teleconference, the ATL will review each audit finding to:
 - Document and respond to comments from park and concessioner staff.
 - Close isolated audit findings (if applicable).

Comments on Preliminary Audit Report



- Isolated audit findings:
 - Concession employees adequately address the audit finding of concern.
 - Park concessions specialist must confirm corrective action taken.
 - Isolated findings the audit team can confirm are closed will not appear in the Final Report.



Priority 3 Findings

- Many Priority 3 findings are identified non-conformances with maintenance or operating plan requirements.
- Contract plan requirements that are determined in consultation with park staff to be unfeasible will be voided if the contract plan requirements are revised.
- Unfeasible plan requirements **must** be replaced with an attainable requirement that provides equal or greater benefit to the environment.



Final Audit Report Notification

Final audit report reviewed and approved by NPS Commercial Services Program Chief



Audit coordinator



Park Superintendent will receive a memo with the results of the audit and notification that the final audit report was sent to the park POC. The memo is copied to the regional director, regional environmental coordinator, regional concessions chief, park POC, and the ATL.



Park POC will receive an email with the final audit report and instructions on transmitting the report to the concessioner.



Concession POC receives the final audit report from Park POC with instructions and guidance on managing corrective actions and closing any remaining audit findings.



Documenting Closed Findings

- Concession staff will prioritize and implement corrective action for each open finding.
- Concession staff will complete the CAT for closed findings and submit it to park POC.
- Park POC will review that the concessioner completed the CAT, verify closure (in person/via photographs/or other as appropriate) and document verification in the CAT. They will forward results to the ATL.

Closing out the Environmental Audit



- Concessioners are required to identify and implement corrective actions for findings. Updates need to be made in the CAT and documentation provided to the park POC.
- The park POC will verify whether findings have been closed and forward closure updates bi-monthly.
- After all findings are corrected and corrective actions are verified, the audit report is closed.

Open Findings and the AOR



- Environmental audits are a ‘special attention item’ in the Environmental Management Program (EMP) section of the Annual Overall Rating (AOR).
- Concessioners with open findings after the closure deadline will be capped at ‘marginal’ on their EMP ratings which will prevent them from acquiring a ‘superior’ rating in the overall AOR.
- WASO will do spot checks on AORs submitted for contracts with open audit findings to make sure the EMP has been completed correctly.

Telephone Audit (Baseline)



Audit Phase	Description
Pre-audit	<ul style="list-style-type: none">• Park POC coordinates with ATL and concessioner staff to schedule telephone audit. Telephone audit is convened via conference call and generally require one hour.• Park POC will forward audit questionnaire to concessioner staff (Concessioner staff can complete this questionnaire ahead of time, but it is not required. Questionnaire is intended to help them prepare for the audit).
Audit	<p>One-hour phone call to include:</p> <ul style="list-style-type: none">• Brief Introduction• Audit Questionnaire review• Data collection including telephone interview, records, documentation, and photo review• Opportunity for concessioner to ask questions for clarity or additional information• Conclude call
Post Audit	<ul style="list-style-type: none">• Concessioner POC or park POC will forward any documentation necessary that was not provided during the call to the ATL.• Process resumes with the same procedures as site audits.

Paper Audit (Routine)



Audit Phase	Description
Pre-audit	<ul style="list-style-type: none">• ATL distributes audit questionnaire to park POC.• Park POC will forward audit questionnaire to concessioner staff for completion.
Audit	<ul style="list-style-type: none">• Concessioner staff will return the completed audit questionnaire to the park POC.• Park POC will forward completed audit questionnaire to the ATL for review.
Post Audit	<ul style="list-style-type: none">• Concessioner POC or park POC will forward any documentation necessary that was not provided during the call to the ATL.• Process resumes with the same procedures as site audits.



Questions?



Contact Information

- Environmental audit questions
cs_envaudits@nps.gov
- **Kat Berry**, Concessions Management Specialist/Environmental Audit Coordinator
kat_berry@nps.gov
202.513.7153

Remember to contact your park's
Concessions Management Specialist first!