



Environmental Audit Program Information for Concessioners

March 2022

Agenda

- Elements of an environmental audit
 - Audit scope
 - Environmental audit criteria
 - Types of environmental audits
- Site audits
- Audit finding priorities
- Post-visit process and timeline
- Final audit report
- Closing out the environmental audit
- Phone audits
- Paper audits

Introduction

- Who we are:
 - NPS Commercial Services
 - Regional concession chiefs
 - Park concession 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 (site, phone, or paper audit)
- Audit criteria
- Period under review
- Concessions 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 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 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.

Audit Types (continued)

- **Non-standard audits:**
 - **Phone/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. Phone audits are conducted for new contracts to establish a baseline. Paper audits are conducted if a baseline phone audit has been completed.
 - **Cruise Ship Audits:** Some concessions (e.g., cruise ships) are subject to comprehensive environmental evaluations through a third-party auditor (e.g., U.S. Coast Guard) that may serve in place of a standard NPS Commercial Services environmental audit.

Environmental Audit Types (continued)

- **Conditionally exempt:** Some concessions 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. The conditionally exempt justification is verified at least every ten years.

Environmental Audit Finding Priorities

- **Priority 1:** Findings represent non-conformance with laws and regulations that pose immediate, actual, or potential harm to human health or the environment.

NOTE: Priority 1 findings should be addressed as soon as possible.

Audit Finding Priorities Continued

- **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.

NOTE: Priority 2 and Priority 3 findings should be addressed according to the timeline determined by the audit team and the park.

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 in the audit report 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.

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
- **Concessioner will complete the audit questionnaire and provide the associated environmental documentation (concessioner written plans, waste disposal records, etc.) that the Park POC can forward to the ATL pre-audit to save time during the site visit.**

Site Visits

- Focuses on an inspection of concession facilities, services, and operations.
- Provides 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 opportunities for best management practices (BMP).
- A typical audit site visit duration is one 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)

NOTE: This can also be conducted 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 including the audit team touring concession facilities and taking notes and photographs
- Interviews with concession staff
- Records and documents review
- The concessioner and park staff should ask questions throughout the process. Audits provide an opportunity to better understand compliance issues, corrective actions, and BMPs.

Exit-Brief

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

Post-Visit Process

- Preliminary Audit Report forwarded by the park POC 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.
- ATL, park POC, and concessioner POC will participate in the conference call scheduled during the Exit Brief to discuss comments. The CAT must be completed prior to the scheduled comment call.
- Final Audit Report forwarded by the park POC 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 concessioner POC
 - Concessioner reviews audit report
- Within 5.5 weeks following the site visit:
 - Concessioner POC, after reviewing the audit report, will document comments on the audit findings using the CAT, including findings they don't agree with, have questions about, and/or have completed corrective actions
 - Park POC will confirm audit finding closures (if any) and verify concessioner comments in the CAT
 - Park POC will coordinate with audit team and concessioner POC to schedule comment call to complete CAT, answer any questions, and close audit findings
 - Concession POC will be prepared to discuss questions and comments as documented in the CAT with audit team and present corrective action measures taken on findings (if applicable).

Post-Visit Timeline (continued)

- 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 an update on corrective actions not yet documented in the CAT
 - Park POC will forward updated version of CAT to Commercial Services
- After 180 days from issuance of the Preliminary Audit Report (maximum deadline for closure of Priority 2 and 3 audit findings), NPS Commercial Services will request updates on corrective actions on an annual basis

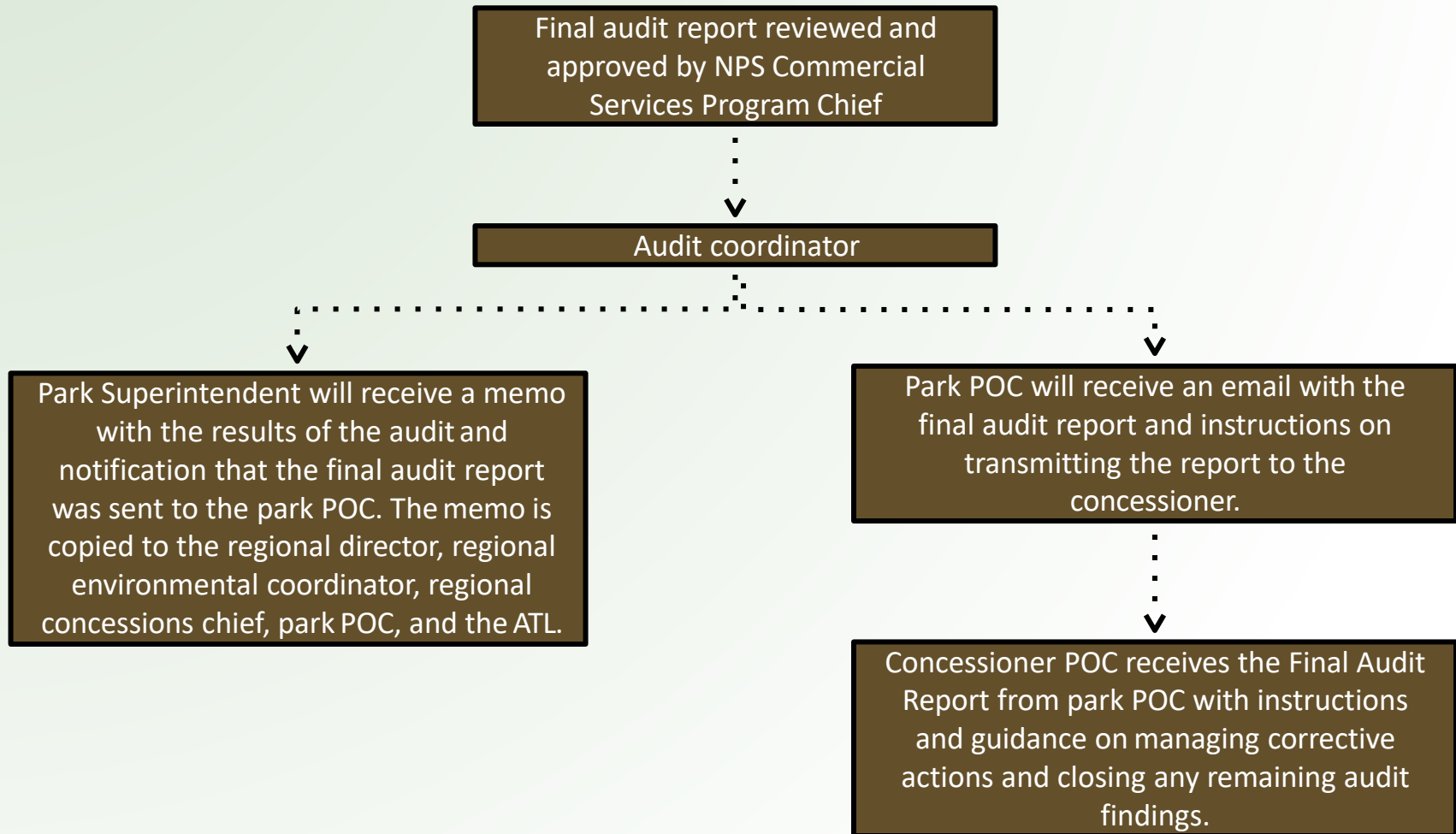
Comments on Preliminary Audit Report

- Concessioner and park are expected to document comments on the Preliminary Audit Report via the CAT.
- During the comment call, the ATL will review each audit finding to:
 - Document and respond to comments from park and concessioner staff
 - Close audit findings (if applicable)

Comments on Preliminary Audit Report (continued)

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

Final Audit Report Notification



Documenting Closed Findings

- Concessioner staff will prioritize and implement corrective action for each open finding.
- Concessioner staff will document corrective action taken in the CAT for closed findings and submit it to park POC.
- Park POC will review concessioner completed corrective actions and verify closure (in person/via photographs/or other as appropriate), and document verification in CAT.
- Park POC 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 as necessary.
- After all findings are addressed 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 does spot checks on AORs submitted for contracts with open audit findings to ensure the EMP has been completed correctly.

Telephone Audit

Audit Phase	Description
Pre-audit	<ul style="list-style-type: none"> • Park POC coordinates with ATL and concessioner staff to schedule phone audit. Phone audit is convened via conference call and generally requires 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 assist in preparing 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 • Conclusion of 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

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 and request it be returned within one week
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

- Park POC
- Audit Team Leader
- cs_envaudits@nps.gov
- Corporate environmental officer (if any)