

The Corrective Action Tracker, or CAT, is an Excel-based tool designed to track the status and capture comments on findings from NPS Commercial Services Program environmental audits. After an audit has been conducted, the audit team develops a preliminary environmental audit report package that includes a CAT populated with the findings from the preliminary audit report. The park concession specialist will forward the preliminary audit report package to the concessioner prior to a comment call with the environmental audit team to review the findings. To ensure the macros work properly, please download the CAT and save it to your local drive before reviewing the findings and providing feedback.

This tutorial will begin on the second tab of the CAT labeled "Findings." Starting at Row 11, Column A includes the finding number, which corresponds to the number in the preliminary and final audit reports. Column B displays the current status of the finding as either "Open" or "Closed," which will be updated as appropriate. Closing a finding in the CAT can only be done by the audit team. Column C provides the priority level of the finding between 1 and 3, which is determined based on the nature of the finding's non-conformance with laws, regulations, or policies and the threat it poses to human health or the environment. All 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. If a finding is determined to be isolated, the word "Yes" will be filled out in Column D. Column F provides the topic area of the finding and Column G includes a description of the finding. If a deadline to close the finding was determined during the environmental audit, it will be documented in Column H.

Concessioners are encouraged to provide comments on the findings in Columns I through M, Q, S, and T of the Findings tab.

**[Click dropdown menu in I12]** Column I includes a dropdown menu to choose an option which classifies the Concessioner's impression of the nature and content of the findings into one of three categories. A Concessioner will choose "Agree" if they agree with the finding and plan to address it through corrective action. "Disagree" indicates that the Concessioner has reason to disagree with the finding and believes it should be voided or significantly revised before it is agreed upon. "Unknown" indicates that the Concessioner cannot agree or disagree with the finding due to a lack of information or clarity. For findings with which the Concessioner agreed, they are asked to identify any comments they have regarding the information in the finding and whether they feel any aspects may need to be amended in Column J.

If the Concessioner categorizes any findings as either "Disagree" or "Unknown" in Column I, they are asked to scroll to the right and fill out the corresponding questions explaining why. Depending on the classification in Column I, inapplicable columns may become grayed out to focus the attention of concessioner and park representatives on cells that require comments.

**[Click "Disagree" in I12, click "Unknown" in I13, scroll to column Q]** For findings with which the Concessioner disagreed, they are asked to explain their reasoning in Column Q. For findings classified as "Unknown," the Concessioner is asked to describe why it is difficult to classify the finding in Column S. Some examples include: "Please clarify the following sentence or terms" or "Please clarify how the citation is applicable to our operations." Column T provides space for the concessioner to explain in one or two sentences any recommendations they have on how the finding can be improved. Once the concessioner has classified all the audit findings and provided corresponding feedback and rationale as

necessary, they must submit the CAT to the concession specialist who will complete their portion of the form.

**[Scroll to column N]** In Column N, the concession specialist is asked to note any comments park staff have on the findings with which the concessioner agreed, and whether or not they concur with the concessioner's comments.

**[Scroll to column Q]** For findings with which the concessioner disagreed, the concession specialist is asked to indicate in Column R whether they concur with the concessioner and explain their reasoning in one or two sentences. For findings the concessioner classified as "Unknown," the concession specialist is asked to explain whether they agree with the concessioner in Column U and describe in one or two sentences any recommendations they have on how findings can be improved in Column V. Once these Park columns have been completed, the concession specialist is asked to forward the CAT to the Audit Team Lead prior to the audit comment call.

**[Scroll to columns W through AA]** This comment call will be scheduled within two weeks of the concession specialist receiving the Preliminary Environmental Audit Report package. During the comment call, each audit finding will be reviewed to discuss and explain or modify any findings with which the concessioner does not agree, document and respond to comments from park and concessioner staff, and close isolated audit findings (if applicable). The audit team will record the results of this discussion in Columns W through AA. In Column W, they will provide responses and clarification to the concessioner and park comments. In Column X, they will choose an option from a dropdown menu indicating any necessary changes that will be made to status of the finding, including "Void," "Edit," "Close," and "No Change." If the audit team plans to amend a finding, conduct research, or perform other actions to respond to comments, they will briefly describe the steps they plan to take in Column Y. If applicable, Column Z will be used to record any final comments on actions taken by the audit team to confirm they were completed. This may include a comment such as "Finding was voided." The date the comment call was held will be recorded in Column AA.

**[Scroll to column E]** If it is determined during the comment call that any isolated audit findings can be closed, the value in Column E will be update to "No" to indicate that it will not be included in the Final Environmental Audit Report.

**[Scroll to column B8]** The Findings tab is used to track the status of the findings throughout the environmental audit process. Please note that you will be prompted to confirm that cell B8 has been updated with the current date every time the form is modified.

**[Scroll to column K]** Concessioners should use Column K to identify the steps they took to address the issues in each finding. They must also submit any relevant documents or photos to the concession specialist to confirm the actions taken. In Column L, concessioners are asked to choose "Yes" or "No" from a dropdown menu to indicate whether they think a finding should be closed. For findings that are completely addressed and can be closed, concessioners must record the date on which all corrective actions were completed in Column M.

The concession specialist then confirms that corrective actions have been taken by reviewing the photographs and documentation submitted by concessioners or performing their own visual assessments. In Column O, the concession specialist must describe in one or two sentences how they

confirmed that the concessioner's corrective action has been completed. In Column P, the concession specialist is asked to choose "Yes" or "No" from a dropdown menu to indicate whether they think a finding should be closed.

**[Scroll to column B]** Once the concessioner and concession specialist both indicate that a finding should be closed, the audit team will use the information recorded in the CAT and any documentation and photographs provided to confirm that all issues in the finding have been completely addressed. If appropriate, the finding status in Column B will be updated to "Closed," and the cells in Columns A through H will change from red to green. **[Click "Agree" in I11]**

**[Toggle to Summary tab]** The first tab of the CAT labeled "Summary" contains metadata from the environmental audit in rows 6, 8, 10, and 12. The audit team will populate the name of the park and concessioner, the contract number, and the dates that the audit was conducted, the preliminary report was issued, and the final report was issued. The park and concessioner representatives filling out the CAT must enter their names in row 8 and 12, respectively.

Rows 17 through 24 provide a status summary of the report findings. The table in columns C through E includes a breakdown of the number of findings by status, including findings which have been closed, isolated findings which were closed prior to the issuance of the final report, open findings, findings with which the concessioner disagreed or classified as "Unknown," and findings that were voided after the comment call. The breakdown of the findings by status category will also be displayed graphically in a pie chart in Columns G through I. The table in Columns K through M displays the number of open findings for each priority level from one to three, as well as the number of isolated findings. Cell K17 displays the current audit closure progress as the percentage of audit findings that have been closed. The link in merged Cell F27 that displays the text "CLICK HERE TO VIEW FINDINGS" takes you to the Findings tab discussed earlier in the tutorial.

After the comment call is held, the NPS Commercial Services Program will send three bi-monthly requests to the concession specialist for corrective action and closure updates, followed by annual and other periodic requests as necessary. Information on corrective action and closure updates can be sent directly to the Audit Team Lead or to the email address "c s underscore e n v audits at nps dot gov". The CSP website provides additional information and assistance resources at the URL "www dot nps dot gov forward slash subjects forward slash concessions forward slash index dot htm."