



Post-Verification Fact Sheet for EMS Agencies

Introduction

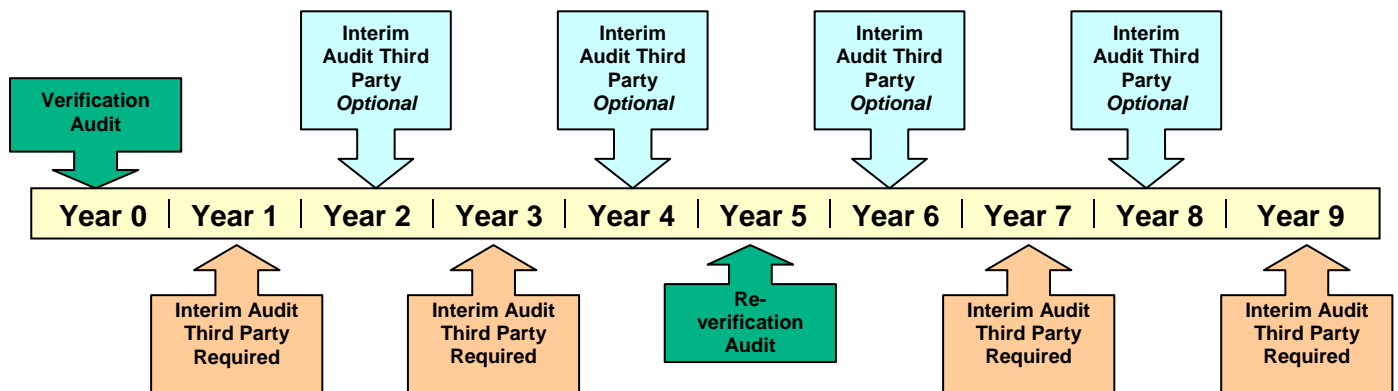
This fact sheet has been prepared for biosolids agencies participating in the NBP Environmental Management System (EMS) Program that have achieved, or are close to seeking, third party EMS verification and NBP certification. This fact sheet includes a description of the minimum requirements for ongoing auditing and reporting to retain NBP certification. The information in this fact sheet is also presented in Chapters 9 and 11 of the *NBP Biosolids EMS Guidance Manual*¹. For ease of reference, there are page numbers below indicating where the information resides in the *Biosolids EMS Guidance Manual*, so that agencies may find more information on the topic.

Ongoing Third Party Auditing Requirements

Annual interim audits (four total) are required between verification audits (pages 11-48 through 11-50).

- Two interim audits must be conducted by third party auditor (e.g., years 1, 3). These are referred to as third party interim audits.
- Two interim audits may be internal audits that substitute for third party interim audits (e.g., years 2, 4). These are referred to as internal interim audits.
- The biosolids agency has a choice regarding the use of internal or third party interim audits in eligible years. Minor nonconformances found during a previous audit or changes to the EMS do not necessarily preclude this choice.

The pattern for verification and interim audits is as follows.



Verification and Interim Audit Schedule Pattern

¹ The updated version of the *Biosolids EMS Guidance Manual* is available on NBP's website, www.biosolids.org.

Note that the timing of optional years for substituting an internal audit for a third party interim audit shifts after year 5. Internal audits may be substituted in the year immediately following the year 5 Re-verification audit. For years ten and on, the verification and interim audit cycle matches that from years 5 through 9.

There are minimum interim audit scope requirements for all interim audits, whether conducted by third party or internal audit team (page 11-49).

- All 17 EMS Elements must be reviewed during the cycle of annual third party interim and internal audits (e.g., split between 4 years).
- All interim audits must look at progress towards goals and objectives, outcomes, corrective actions, and management review process.

Agencies should develop a 4-year audit plan with third party auditor (page 11-43).

- Discussions are required and written plan is encouraged.
- Agencies must communicate anticipated changes to EMS/biosolids operations/key EMS personnel and intent to substitute internal audits in eligible years.
- Agencies and auditors must communicate anticipated scope for each third party interim and internal interim audit.

Agencies must submit an *interim audit request form*² annually to launch scheduling and contract process with third party auditors or to indicate intent to substitute internal audit (page 11-48).

Ongoing Internal Auditing Requirements

The purpose of internal audits is to determine if the EMS is effectively meeting the biosolids management policy, program requirements and biosolids program goals and objectives.

Agencies may choose the scope and timing of internal audits (page 9-26).

When internal interim audits substitute for third party interim audits (i.e., years 2, 4, 6, 8), there are specific scope requirements. (pages 9-26 and 11-49)

- Scope must be the same as third party interim audit scope requirements.
- Scope should be consistent with the agreed upon four year audit plan.

The scope of internal audits may shift over time (page 9-26).

- The first internal audit (conducted before EMS verification) may be a comprehensive check of all elements for readiness.
- Subsequent internal audits may be spot checks – there is no requirement that an organization cover all 17 Elements annually or collectively through the internal audits.

² The *Interim Audit Request Form* can be found on the NBP website with other related EMS documents.



- Agencies may cover less during years where third party auditor will be on-site. There is no requirement to conduct the internal audit on the same elements that the third party auditor would audit.

Agencies should connect internal auditing activities to management review and annual performance report preparation (page 9-24).

- No need to duplicate efforts.

Ongoing Reporting Requirements

Agencies must complete an annual performance report, which includes a summary of the most recent audit and progress towards goals and objectives (pages 9-15 and 11-47).

- Agencies must make annual performance reports available to public/interested parties and send a copy to NBP.

Agencies must prepare and make available internal interim audit reports in years where substituting for third party interim audit (page 11-49).

- Agencies must make reports available to public/interested parties and send a copy to NBP.

More Information

For more information, please contact Pete Machno, NBP EMS Program Manager, at 1-800-613-4502 or peterm7@prodigy.net.

Examples of Two Different Audit Approaches That Meet NBP Requirements

Agency ABC

- Annual third party audits for all four interim audits
- Internal interim audits annually
 - Scope focuses on corrective actions to address minor nonconformances and changes, as well as progress towards goals, objectives, and outcomes

Agency XYZ

- Third party interim audits only in years 1 and 3
 - No internal audits conducted those years
 - Results of third party interim audits feed into management review and annual performance report preparations
- Internal interim audits only in years 2 and 4
 - Same scope as third party interim audits