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Policy
for

EHS External Audit

REVISION

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1	DCN0510	Initial Release	7-2-09	J. Trodden	R. Segura

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1. PURPOSE AND SCOPE

This policy provides guidelines concerning preparation for regulatory audits and appropriate behavior toward regulators.

2. DEFINITIONS

2.1 CNSE senior management acknowledge that certain regulatory agencies have the authority to audit the operations of CNSE, and support such audits as part of their continuing effort to maintain compliance.

Entities that may audit CNSE include: New York State Department of Environmental Conservation (NYSDEC), New York State Department of Health (NYSDOH), Environmental Protection Agency (EPA), Occupational Health and Safety Administration (OSHA), New York State Code Enforcement, New York State Fire Inspection, insurance carriers/agencies, tenant representatives, etc.

3. PROCEDURE

3.1 **Ongoing Preparation**: Readiness is the key to a good outcome for any type of audit. In order to strive toward continual readiness the following activities are in place.

3.1.1 Self-audits – Ongoing audits may be performed using the CNSE Audit Checklist.

3.1.2 Ongoing review of Policies and Procedures – Routine review of policies and procedures assure that written documentation accurately reflects CNSE practices. Ongoing review also assures policies are consistent with current federal, State and local regulations.

3.2 **Notification and Preparation for an Audit**: The aforementioned agencies may conduct an unannounced audit of the CNSE facility. Upon arrival at the CNSE facility the CNSE Department Manager '*department manager'* to be audited will assign the appropriate person within his/her department to escort the auditor and will ask the following questions:

3.2.1 How long the audit is anticipated to take? To allow for appropriate arrangements; and

3.2.2 What specific materials or files will be needed?

NOTE: Two CNSE people are always required to accompany the auditor for the duration of the visit.

3.3 **Alert CNSE Management Staff**: As soon as possible after the notification call, the CNSE department manger will notify the following personnel. These individuals or designees may need to be available for interviews with the inspectors, as well as, quick consultations by the CNSE staff aiding with the audit.

- Facilities Manager – James Ochal
- Legal Counsel – Brenda Birken
- Operations Manager – Michael Tittnich
- Laboratory Manager – Brian Taylor
- Professors (if appropriate)

4. PREPARATION OF AUDIT DOCUMENTS/TOOLS

4.1 **Prepare a Notebook for the Audit** – This file will contain the CNSE department manager's and assignee's notes on the inspection; copies of any documents copied by the inspector; and any other documents, as requested or provided by the inspector.

4.2 The CNSE department manager shall obtain a workspace for the auditor – the work space should have a table and comfortable chairs and be able to accommodate 3 or 4 people to meet comfortably with the auditor.

4.3 **Access to Copy machine** –

4.3.1 Auditors may be given unrestricted access to a copier as long as they agree to make copies for the CNSE office of whatever is copied (or)

4.3.2 CNSE staff will make copies requested by the auditor and make copies for the CNSE office as well.

5. PARTICIPATING IN AN AUDIT

5.1 Upon the inspector's arrival at the facility the CNSE department manager will document the inspector's name and address of the district office.

5.2 **Audit Activities**: The CNSE department manager, with assignee present, should do the following:

5.2.1 Request a daily "exit" interview with the inspector. This may allow for answering any questions the inspector may have – or may provide the opportunity to immediately correct any "minor" discrepancies.

5.2.2 Keep a list of any interviews conducted by the inspector and if possible take notes during the interview. This will help with CNSE staff/member debriefing following the inspection.

5.2.3 Request an exit interview where the inspector identifies any deficiencies found during the audit. Request clarification for any items described, if needed. Provide the inspector with a time frame within which an action report will be provided, if needed (usually within 7 to 10 days).

6. FOLLOW-UP AFTER AN AUDIT

Reports of the audit, either verbal or written, should be addressed by the CNSE senior management staff, (with the assistance and support of the Department being audited), as soon as possible after the audit.