



Working to ensure environmental excellence in biosolids management

Self-Assessment as an Interim Audit

This document supplements the...

- *NBP Guidance for Biosolids EMS Interim Audits* (August 2, 2004); for a copy of that document, please see: <http://www.wef.org/WorkArea/linkit.aspx?LinkIdentifier=id&ItemID=7720>
- *NBP Third Party Verification Auditor Guidance* (August 2011); for a copy of that document, please see: http://www.wef.org/AuditorGuidance_August2011

Background

The National Biosolids Partnership (NBP) provides opportunities for organizations to receive recognition for their biosolids management program (BMP), a formal management system based on the principles of continuous improvement and environmental management systems (EMS). Four levels of recognition are available: Bronze, Silver, Gold, and Platinum. Two of these, Gold and Platinum, require successful completion of a verification audit conducted by an accredited third party audit company at least once every 5 years. The biosolids organization selects the third party audit company it wishes to use, provided that the audit company selected, and its auditors, are accredited by NBP and independent of the organization being audited. Through the audit process, the audit company provides *verification* that the organization's management system is meeting the NBP requirements. The NBP provides *recognition* or *certification* of the organization's BMP.

Platinum Certification

NBP Platinum Certification of an organization's BMP is issued based on the results of a verification audit conducted at least every 5 years by an accredited independent third party audit company. This audit is intended to verify that the organization's BMP meets NBP expectations and the specific requirements of the NBP BMP Elements. The scope of each verification audit must include all parts of the organization's BMP and other subjects, as defined in NBP's *Third Party Verification Auditor Guidance*.

Continuing Platinum Certification is determined by annual interim audits conducted in each intervening year between verification audits. Interim audits are intended to verify that the organization's BMP is functioning effectively (i.e. doing what it is intended to do) and continues to meet NBP expectations and requirements. The scope of each interim audit includes parts of the organization's BMP (such that the entire BMP is covered over the course of the 4 interim audits) and other required reviews, as defined in NBP's *Third Party Verification Auditor Guidance*. Interim audits in years 1 and 3 following verification are conducted by an accredited third party audit company. In years 2 and 4, the organization can choose to have the interim audits conducted by the third party audit company, or it may substitute a self-assessment as the interim audit. This arrangement is made in consultation with the organization's third party auditor.

Self-assessment:

As used in this document, this means an internal audit that is used to verify that the BMP is in conformance with NBP requirements.

Gold Recognition

NBP Gold Recognition of an organization's BMP is issued based on the results of a verification audit conducted at least every 5 years by an accredited third party audit company. The purpose and scope of these audits are the same as described above for Platinum Certification.

Continuing Gold Recognition is determined by interim audits conducted by the biosolids organization as self-assessments in each of the four years between third party verification audits. The scope of each self assessment interim audit includes parts of the organization's BMP (such that the entire BMP is covered over the course of the 4 interim audits) and other required reviews, as discussed in the *Third Party Verification Auditor Guidance*. "Interim audits focus on ensuring 'system health' (i.e., that the system is doing what it is supposed to) in between verification audits" (p. 39).

Summary of options for interim audits

The first step in the interim audit process, no matter which of the following options are chosen, is for the organization to alert interested parties that it will be conducting its interim audit.

The organization should plan to submit its interim audit report to the NBP within approximately 10 days of its NBP verification anniversary date.

Then, the organization utilizes one of the following three processes:

1. The third party auditor completes the interim audit.
 - The third party auditor submits a copy of the interim audit report to NBP.
 - The third party auditor submits a statement that the verification of the organization is continued (or not) for another year.
 - If verification is continued, NBP provides the organization with Platinum Certification or Gold Recognition for another year.
2. The organization completes a self-assessment for its interim audit, with third party auditor review.
 - The third party auditor provides feedback to the organization. This review may incur a fee charged by the third party audit company.
 - The organization revises its self-assessment report, if needed, and submits it to the NBP.
 - If applicable, the third party auditor submits a statement to the NBP that the audit company verification of the organization is continued for another year.
 - Based on the recommendation of the third party auditor, NBP determines whether or not to continue the organization's Platinum Certification or Gold Recognition for another year.
3. The organization completes a self-assessment (internal audit) for its interim audit.
 - The organization submits its self-assessment report to the NBP.
 - The organization fully discloses the results of its self-assessment to interested parties and the public, either in the form of the full report or as a summary detailing the results.¹
 - The NBP reviews the self-assessment report, using the process described below, to determine whether or not to continue the organization's Platinum Certification or Gold Recognition for another year.

Procedure for NBP review of an organization's interim BMP self assessment (internal audit)

The self-assessment interim audit report must include (as required by *Auditor Guidance*):

Title Page:

- Heading: National Biosolids Partnership BMP Audit Report
- Organization's name and address
- Date issued
- Date revised
- Audit team members' names and roles
- References:
 - *Elements of a Biosolids Management Program (BMP Elements)*
 - Organization's biosolids management program policy and BMP Manual
- Signatures of organization representative and lead auditor with date

Body of Document:

- List of persons participating in the audit, including interested parties and contractor personnel
- List of any final use and disposal operations included in the audit
- Pre-audit document review summary
- List of documents reviewed citing any strengths and weaknesses
- List of requirements for documentation taken from *BMP Elements* along with references to relevant organization documents that meet each of the requirements
- Finding sheets indicating areas of strengths and weaknesses, outcomes examined, and any nonconformances with the requirements as identified in the *BMP Elements*, including a description of the nonconformance and if major or minor

¹ NBP Third Party Verification Auditor Guidance (August 2011), P. 39: "Organizations may choose to substitute internal audits for third party interim audits in two years of the five-year verification cycle, provided the results of the internal audits are fully publicly disclosed and the independent third party audit is not needed to ensure proper system functioning and health."

- Auditors' determination regarding BMP verification
- Organization's observations
- A statement that the organization will fully disclose the results of the internal audit to interested parties and the public
- A written declaration that the self-assessment interim audit meets all NBP requirements for continuing Platinum Certification or Gold Recognition and that documents and records relating to the self assessment (internal audit) are on file at _____ [insert location]

Within 10 days of receipt, NBP staff reviews the self-assessment interim audit report, makes a decision on the acceptability of the report, and provides a formal response to the organization.

- NBP review is based on the content of the self-assessment report. NBP does not review or make judgments on the substance, such as the adequacy of the management review process; rather, the review will only determine that the management review process took place, as demonstrated by its inclusion in the report.
- The NBP will accept comments from interested parties regarding the organization's self-assessment interim audit and report. NBP will take into consideration such comments and attach them to NBP's review of the report for the edification of the organization.
- If NBP does not respond in 10 days, the organization's self-assessment interim audit report shall be considered approved by the NBP, and the organization shall maintain the organization's Gold or Platinum status².
- If NBP finds the self-assessment interim audit report not acceptable, the NBP will provide written guidance to the organization regarding what needs to be addressed. Within 10 days of receipt of this guidance, the organization shall respond to the NBP with an updated report or a detailed plan and schedule for timely completion of a revised self-assessment interim audit and/or report. If the review process time period extends past the NBP anniversary date, the organization's Gold or Platinum status will be maintained during the review process. If the organization does not respond in 10 days, the NBP may retract the organization's Gold or Platinum status.

Appeals Process - The organization can appeal the NBP's decisions regarding the acceptability of its self-assessment interim audit report to WEF Program Manager, Lisa McFadden, at any time. The appeal must be in writing and clearly state the reasons for not accepting the NBP's decision. WEF must make a decision within 30 days to approve or not approve the organization's self-assessment audit report as meeting the NBP requirements. During an appeal, the organization's Gold Recognition or Platinum Certification will be maintained.

² Some third-party audit companies have expressed concern that having 2 years between third-party audits is unusual and not consistent with ISO protocols. However, the NBP program, while built on ISO 14001 standards, is not the same. From its inception, the NBP program has allowed for internal audits/self assessments to be substituted for third-party audits in years 2 and 4 of the 5-year audit cycle. Current NBP-certified EMS/Biosolids Management Program auditors concur that the NBP program and audit schedule, with self-assessments as interim audits, is robust and appropriate.