

**REGION 4**  
**PEER-AUDIT PROGRAM SUMMARY**  
**“FROM TRAINING TO COMPLETION”**

1. Peer Auditors are Trained

- ICUF/FICURMA training = May 22-24, 2007 @ Nova Southeastern
- NCICU Training = June 5-7, 2007 @ Duke University
- AAICU training = June 12-14, 2007 @ Birmingham Southern College
- TICUA training = June 19-21, 2007 @ Lipscomb University
- GFIC training = July 10-12, 2007 @ Emory University

2. Audits scheduled/ Peer Auditors Assigned

Colleges complete information surveys on environmental compliance status for their campuses and indicate a preference for which semester they would request to be audited (Fall 2007, Spring 2008, Fall 2008, Spring 2009, and Fall 2009). HRP develops a schedule to audit 5 colleges per semester per State in Region 4. Peer auditors systematically sign-up for no less than 3 audits each to provide adequate participation in the peer audit program. HRP ensures equal participation among auditors and an even distribution of auditor's discipline for each of the colleges to be audited.

3. Peer Audit is Conducted

- Four (4) weeks prior to each audit, the college is sent a logistics plan and documents request to prepare for the audit and establish a tasks timeline. A proposal for HRP professional audit services is submitted.
- Two (2) weeks before each audit, a formal audit schedule is proposed by HRP to establish “What buildings or departments are to be audited on each day.” This schedule is used by the college to alert their staff. Upon approval, a final copy of the schedule is emailed to all members of the audit team.
- On the day of the audit, HRP and/or the auditors conduct an opening conference (approximately 30 minutes) with the major players from the college being audited. (i.e. President, Deans, Department Heads, Operations Managers, security escorts, etc.)
- The audit is conducted over a predetermined time frame. (1-3 days)
- A closing conference is conducted with the same people as the opening conference using a brief PowerPoint presentation (30-45 minutes)
- A draft one-page summary of the findings is presented electronically to the college site contact to allow the opportunity to commence corrective actions immediately.

4. The Audit Report is Prepared

Within 35 days of the completion of the on-site audit, HRP will deliver to the college and to Halloran & Sage a draft audit report. Please review this draft report within 15 days and provide your comments to HRP so that a final audit report can be prepared. Please note this review period includes time allocated for in-house counsel at each college to review the report.

5. Disclosure of Violations

The college has 21 days from receipt of the final compliance audit report by its counsel to disclose violations to the EPA and the State Environmental Agency. Within 3 days of receipt of the final report, Halloran & Sage will prepare a draft disclosure of all violations indicated in the audit report and forward it to the college for review. Halloran & Sage will discuss this disclosure with the college (under the

attorney/client privilege) and prepare a final disclosure for review by the college. When approved by the college, Halloran & Sage will file it with EPA and the State Environmental Agency.

6. Correction of Violations

Most colleges commence to correct violations the day after the on-site audit is conducted to allow themselves adequate notification and retention of on-site and off-site resources, Per the EPA Agreement, the college has 60 days from filing its disclosure to correct the violations. HRP and Halloran & Sage are on call to assist the colleges in this process. As corrective actions are completed data must be tracked to include: date of correction, by who, how much did the corrective action cost, and what measures are being taken to prevent reoccurrence.

7. Extension of Time

If a college needs an extension of the 60-day period to correct its violations, the college should contact HRP and/or Halloran & Sage as soon as possible and Halloran & Sage will apply for an extension on behalf of the college. The college needs to provide to Halloran & Sage reasons for the extension requested and the amount of time needed. The reasons should be matters of substance, not convenience.

8. Final Completion Report

When the corrective actions are complete (at the end of the 60-day period or such extension as may have been granted), HRP will prepare a draft final compliance report within 20 days following end of corrective action and send it to the college and to Halloran & Sage for review. Please review that draft within 10 days and deliver comments to HRP. A final compliance report needs to be filed by Halloran & Sage with EPA and the State Environmental Agency within 30 days of completion of the corrections.

9. Closeout

Unless EPA or the State Environmental has questions, filing the final compliance report ends the initial process for the participating college, except that, if further violations are found while the Peer Audit program is running, these may be disclosed, corrected, and treated as if they were part of the original disclosure.

10. Future Requirements

As demonstrated in the signed EPA Region IV Peer Audit Agreement, Section IX, Miscellaneous Provisions within 24 months following close-out of the audit process described above, periodic audits must be scheduled or the implementation of an Environmental Management System (EMS) for each college be demonstrated. The EMS should address each of the elements described in <http://www.epa.gov/ne/assistance/univ/pdfs/ems/mpguide/.pdf>