Conducting Green Procurement Audits
Environment, Energy Security, and Sustainability
Conference and Exposition

12 May 2011

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### Conducting Green Procurement Audits

Presented at the NDIA Environment, Energy Security & Sustainability (E2S2) Symposium & Exhibition held 9-12 May 2011 in New Orleans, LA.

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Standard Form 298 (Rev. 8-98)

Prescribed by ANSI Std Z39-18
PURPOSE: To provide an overview of conducting reviews of facility Green Procurement programs.

- Why do a Green Procurement Audit?
- Preparing for the Audit
- Conducting the Onsite Audit
- Developing Audit Conclusions and Recommendations
Why a GP Audit?

• Enhance implementation
• Measure GP performance
• Focus on ways to improve
• Other Drivers –
  – The facility’s Environmental Management System (EMS)
  – Compliance inspections (TEAM Guide)
  – Regulatory agency inspections
Preparations

• Know your objectives and desired outcome
• Establish audit criteria
• Establish audit scope
• Become familiar with the facility’s procurement procedures
• Determine the facility’s GP implementation status and progress
• Tailor the audit based on the facility’s size, mission, complexity
GP Audit Criteria

• Federal Acquisition Regulations (FAR Part 23)
• Executive Order 13514 – Sustainable Procurement
• Federal Procurement Preference Programs
  • Comprehensive Procurement Guidelines (CPGs) – Recycled-content (USEPA)
  • BioPreferred Program – Biobased (USDA)
  • Energy Star – Energy Efficient (USEPA)
• DOD GP policy and strategy
  • Component-specific requirements
• Facility EMS targets and objectives
Preparations

• Scheduling
  • Contact facility GP program coordinator to set up schedule
  • Schedule appointments in advance with key personnel
  • On site, fill in time with spot-checks of functional areas, janitorial closets, storage cabinets, supply rooms, retail stores

Auditing Tip: Schedule with your busiest contacts first
Preparations

• Arrange kick-off meeting with key players
• Ask for documentation in advance (contracts, purchasing records)
• Compile information to take with you
  • Regulations and requirements
  • Fact Sheets
  • Product information
  • Sample plans and forms
Conducting the Audit

• Allow enough time for each site visit (30-60 minutes)
• Be flexible with appointments
• Allow time to look at records
• Plan questions ahead of time
• Address program elements:
  – Plans, procedures
  – Successes and obstacles
  – Training availability and effectiveness
  – Measurement of performance indicators
Conducting the Audit

• Key Personnel
  – Contracting staff
  – Contractors
  – Purchase card program manager
  – Purchase card trainer(s)
  – Purchase card approving officials
  – EMS manager
  – Energy manager
  – Environmental staff

• Site Visits
  – Public Works/Engineering
  – Logistics
  – Supply Store
  – Dining Facility
  – Maintenance
  – Medical
  – Information Technology
  – Hazmart/Pharmacy
Conducting the Audit

• Personnel Associated with Contracted Activities (Requirements Generators, Engineers, and Procurement Staff)
  – Construction
  – Renovation
  – Maintenance
  – Janitorial
  – Grounds keeping
  – Dining
  – Recreation
Conducting the Audit

• Records to Review
  – Facility GP policy
  – GP training records
  – GP Implementation plan
  – Contracts: general contract language and preferences for green products
  – Contracts: FAR provisions and clauses
  – Federal Procurement Data System (FPDS)
  – Credit Card receipts and inspection records
  – Documented exceptions to mandatory preference products (CPG and BioPreferred items)
  – Contractor submittals
Create Forms

• Use standardized forms for interviews and site visits
  – Cover multiple topics for one visit
  – Provide consistent data
  – Help trigger your memory to ask questions
Key Questions

• How are items procured?
• How are contract requirements defined?
• What is the procurement review process?
• What monitoring/checking is already in place?
• How are GP requirements incorporated into training?
• How is the GP policy communicated?

Auditing Tip: Obtain copies of internal checklists
Developing Your Findings

• Address the *overall* compliance status for mandatory preference programs
• Address individual elements of the GP program and make recommendations
  – Policy
  – Training
  – Processes and procedures
  – Review system
  – Measurement
  – Checking and Corrective Action

Auditing Tip:
Cite regulatory or policy references for each finding
Your Conclusions

• The audit should answer the question: does the facility have a program in place to identify green opportunities in the procurement process and ensure that preferences for green products are stated, considered, and provided?
• Does the facility have measurable goals? If not, suggest some.
• How well are they meeting those goals?
Examples of Green Procurement Goals/Targets

• Increase in the number of contracts meeting requirements for recycled-content products (FAR provisions and clauses) in the Contract Action Report*

• Increase in the purchases of Federally-defined indicator items (applies to purchase card, MILSTRIP purchases)*

• Increase in the percentage of contracting personnel trained in Green Procurement*

• Increase number of green items offered in the office supply store

• Ensure 95% of new IT purchases (computers and monitors) meet EPEAT standards

*These are DOD metrics
Questions?