



# NASA Procedural Requirements

**COMPLIANCE IS MANDATORY**

**NPR 8553.1B**

Effective Date: September 22,  
2009

Expiration Date: September  
22, 2019

[Printable Format \(PDF\)](#)

Request Notification of Change (NASA Only)

**Subject: NASA Environmental Management System (Revalidated 8/28/2014)**

**Responsible Office: Environmental Management Division**

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## Appendix E: NASA Environmental Management System Checklist

a. The following series of forms are for use by:

(1) NASA Headquarters Environmental Management Division when conducting EFRs.

(2) Centers when conducting annual EMS reviews or Declaration of Conformance assessments.

b. Each form is intended for use after the Center, sub-organization at a Center that is the subject of the EFR EMS review, or Declaration of Conformance assessment has provided the information outlined in the EMS Checklist.

c. The forms are intended to serve as guidance while experienced auditors conduct audit and review activities. Auditors may choose to make notations regarding sources of information used, individuals present or interviewed, and information obtained on the forms, or they may attach additional pages or copies of material used in the execution of the auditing process.

d. Each form covers one key section of the EMS and includes:

(1) A synopsis of the checklist items for the specific paragraph of the EMS Checklist.

(2) The symbol "**P**" is included in the form, where a procedure is required.

*Note: "**P**" means one or more of the procedures is needed to meet the requirements of various Chapters of NPR 8553.1. In these cases, Centers have the option of documenting the procedures. If the procedures are not documented, appropriate personnel may be required to demonstrate knowledge of expectations.*

(3) The symbol "**D**" is included in the form, where a documented procedure is required.

*Note: "**D**" means one or more documented procedures, maintained in accordance with Chapter 4.4 is needed.*

(4) The symbol "**R**" is included in the form, where a record is required.

*Note: "**R**" means one or more records are needed to meet the requirements of Chapter 5.4.*

e. In all cases, additional procedures, documented procedures, or records may be used at the discretion of the Center. These should be in place if their absence prevents the Center from meeting the requirements of the NPR.

f. Notes such as "check this," "review this," and "confirm that" are included as helpful hints for the reviewers in the Description of Observation/Finding/Other Notes section of each form.

<b>NASA Environmental Management System Review Checklist</b> <b>2.0 Environmental Policy</b>	
<b>Question:</b> How is the NASA environmental policy implemented across the Center, and how are employees and other persons working for or on behalf of the Center made aware of the policy and its applicability to their work?  If the Center has adopted a Center-specific environmental policy as the primary focus of the Center EMS, does its content either reference or cover, at a minimum, that of the NASA Policy, and is it periodically reviewed for continued adequacy?  How are applicable environmental policy commitments documented for contractors and communicated to tenants?	
<b>Description of Observation/Finding/Other Notes:</b>  Canvas randomly selected employees, and ask them to explain how the policy applies to them and the work they do; ask whether they know where to get a copy of the policy.  Is there a plan ensuring that all levels of the organization are familiar with the policy?  How does the Center ensure that contractors and tenants are aware of applicable commitments within the policy and how they affect the Center's ability to meet those commitments?  Review the Center's policy for commitments to compliance with applicable legal and other requirements, pollution prevention, and continual improvement.  Interview contractors and suppliers (i.e., examples of all persons) and determine how they were made aware of the Center's environmental policy and the ways in which it applies to them.	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:



<b>NASA Environmental Management System Review Checklist</b> <b>3.2 Legal and Other Requirements</b>	
<b>Question:</b> How does the Center ensure that the legal and other requirements that are directly applicable to the environmental aspects and impacts associated with its activities, products, and services have been identified, are integrated into Center programs and the implementation of NASA Policies, and are communicated to appropriate individuals? This includes providing access, tracking, and regular updating of information.  How are new or changed requirements incorporated into operating procedures?	
<b>Description of Observation/Finding/Other Notes:</b> <b>P</b> Examine the procedure(s) that the Center uses to: <ul style="list-style-type: none"> <li>▪ Identify existing, new, and changes to legal and other requirements, using NASA-wide, Center-specific, and additional resources.</li> <li>▪ Determine who needs to know this information and how they are kept informed and updated, as appropriate.</li> <li>▪ Keep track of the requirements (document controls apply if the Center has deemed that procedures need to be documented to ensure they are followed).</li> </ul> Any interpretations generated on applicability of legal requirements, Center-specific permits/agreements, or related training are records. <b>R</b> However, unless the Center deems it appropriate to maintain internal records of which legislation applies at different time periods, then the actual laws and regulations are a matter of public record and need not be treated as EMS records.  <b>P</b> Review the Center's procedure for determination of how legal and other requirements apply to the aspects at the Center. Discuss the rationale used that limits the degree of detail to which this analysis of how these requirements apply is conducted.  Discuss how the Center ensures that legal and other requirements are taken into account in the way each EMS element or sub-element operates. <b>Note:</b> This may be done when reviewing this element or as one added part of the conformance assessment for all other elements when they are assessed.	
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<b>NASA Environmental Management System Review Checklist</b> <b>3.3 Objectives, Targets, and Programs</b>	
<p><b>Question:</b></p> <p>What process does the Center use for setting objectives and targets?</p> <p>What factors are considered in setting them?</p> <p>How is progress toward their achievement monitored and how are they reviewed and updated if necessary?</p> <p>Describe the Center's environmental management programs (EMPs) and supporting guides, procedures, etc., and how they address the objectives, targets, and related compliance activities. This includes programs in existence to prevent aspects from becoming high priority.</p> <p>How do the EMPs and management controls ensure that NASA-wide environmental programs, including associated NASA governing documents, are addressed? Include environmental program initiatives and NEPA-related assessment activities.</p>	
<p><b>Description of Observation/Finding/Other Notes:</b></p> <p><b>R</b> Review Center objectives and targets for high-priority environmental aspects and any other aspects for which the Center has decided that objectives and targets are appropriate.</p> <p>If objectives or targets were not set for high-priority environmental aspects based on technical feasibility or economic reasonability, review record. <b>R</b></p> <p>Determine how the Center has considered legal and other technology and infrastructure, operational and mission, financial, and stakeholder issues in setting objectives and targets. If a formal process <b>P</b> was undertaken, there may be records.</p> <p>Get Center personnel to explain how the Center ensures that objectives and targets align with the NASA environmental policy and continual improvement.</p> <p>Have staff explain how progress toward objectives and targets is monitored. <b>R</b> Records of progress, if generated, should be reviewed.</p> <p>Staff should have a consistent answer regarding when and how objectives and targets are reviewed and updated.</p> <p><b>R</b> Review the proportion of objectives and targets that is measurable.</p> <p>Get Center personnel to explain how the Center ensures that objectives and targets align with the Center's environmental policy and continual improvement.</p> <p>Review the Center processes on how EMPs reflect the progression from:</p> <ul style="list-style-type: none"> <li>▪ Identification of new or modified activities, products, and services.</li> <li>▪ Identification of new or modified aspects and impacts and their prioritization.</li> <li>▪ Setting of objectives and targets. If established, documented procedures for program development and execution are present and deemed necessary by the Center, then the procedures are subject to document controls.</li> </ul> <p>Review the Center-generated list of all EMPs and selectively review with Center personnel.</p> <p>Confirm that all high-priority environmental aspects are sufficiently covered.</p> <p>Selectively review with Center personnel the management controls in place for medium- and low-priority aspects to prevent them from becoming high priority.</p> <p><b>R</b> Do EMPs include details on who is responsible, resources, and timelines? Do these appear to be realistic and sufficient? Does the affected staff agree?</p> <p>Review with staff examples of, and what will trigger, a change in a documented EMP and changes in how medium- or low-priority aspects are managed. A replaced, documented EMP will become a record <b>R</b>.</p> <p>How do the programs and management controls highlight and address compliance requirements? Including NEPA and environmental justice where applicable, is it the exception or the norm that these requirements are followed?</p> <p>Review program initiatives and have environmental staff detail how EMPs and their activities are included in all working areas of the Center (such as programs, design, and construction).</p>	
<p>Reviewer Signature:</p>	<p><input type="checkbox"/> Notes continued on other side</p> <p>Date:</p>

<b>NASA Environmental Management System Review Checklist</b> <b>4.1 Resources, Roles, Responsibilities, and Authorities</b>	
<p><b>Question:</b></p> <p>At the Center, how are environmental management roles, responsibilities, and authorities defined, documented, and communicated for all appropriate organizational levels? Is there “<b>stop work</b>” authority within the environmental management office?</p> <p>Describe your environmental civil service staff and their assigned environmental programs. Describe the roles of the environmental support contractor(s) and roles of support contractors that operate environmental programs at the Center.</p> <p>How does the Center management ensure that adequate resources are provided for the EMS?</p> <p>How does the environmental management committee or working group provide cross-organizational support and improve access to senior management?</p>	
<p><b>Description of Observation/Finding/Other Notes:</b></p> <p>Review documentation of roles and responsibilities (R and R) for the EMS. <b>D</b> Review these for senior management, key environmental staff, the EMS Representative, and the EMS cross-functional team or equivalent.</p> <p>When interviewed, do staff’s impressions of their R and R align with those they have been assigned? How have their R and R been communicated to them? Specifically examine R and R with the EMS Representative/EMS cross-functional team or equivalent.</p> <p>During interviews, discuss with senior management and environment staff how R and R are determined and implemented in association with new or changing environmental requirements.</p> <p>Ascertain the extent to which the EMS and environmental program “ownership” rests with environmental staff and the office versus operational staff.</p> <p>Does it appear that management ensures that adequate resources have been provided for the EMS and its maintenance such as the following?</p> <ul style="list-style-type: none"> <li>▪ Are there issues/problems due to insufficient staff?</li> <li>▪ Are there indicators of environmental staffing needs (e.g, excessive overtime, excessive use of contractors, compliance deficiencies)?</li> <li>▪ Is there a degree of success in gaining approval for additional staff and, if not, why?</li> <li>▪ Are programs not being undertaken due to insufficient staff?</li> <li>▪ Are there issues regarding how contractor staff and “inherently governmental functions” are managed?</li> <li>▪ Are resources/funding available for studies, research, and environmental maintenance activities?</li> </ul> <p>Is there a clear line of authority leading from top management to overall programs and to detailed program execution with accountability? Is there evidence that things actually work the way the R and R documentation say they do? <b>R</b> Evidence could be records of communications or instructions, for example, of how resources for a new or changed program were developed.</p> <p>Review processes <b>P/D</b> for the management of contractor operations within the scope of the EMS.</p> <p>Review the EMS Representative’s responsibilities to ensure they include recommending improvements to the EMS, and review how the EMS Representative has been provided with resources to improve the EMS.</p>	
<p>Reviewer Signature:</p>	<p><input type="checkbox"/> Notes continued on other side</p> <p>Date:</p>

<b>NASA Environmental Management System Review Checklist</b> <b>4.2 Competence, Training, and Awareness</b>	
<p><b>Question:</b></p> <p>Describe the process used to identify and track training needs of all personnel whose activities may result in impacts associated with high-priority environmental aspects or compliance activities.</p> <p>Describe the procedures for and content of awareness training provided to employees and other persons working for or on behalf of the Center.</p> <p>How does the Center ensure that personnel, whose activities may result in impacts associated with high-priority environmental aspects or compliance activities are competent on the basis of appropriate education, training, and/or experience?</p>	
<p><b>Description of Observation/Finding/Other Notes:</b></p> <p><b>P</b> Review Center procedures for identification of training needs, requirements for general awareness and competency training, and specific awareness (and related competence) for high-priority environmental aspects and associated impacts that employees may affect. <b>P</b> What triggers recognition of a new or revised training need (internal or external)?</p> <p>The training procedures should ensure that, once identified, needs are correlated with appropriate training programs that are completed and whose effectiveness are monitored.</p> <p>Are training and records <b>R</b> of training complete and up to date? Cross-check selected records with interviewed staff.</p> <p>How does the Center ensure that support organizations, including onsite contractors, are appropriately trained and aware?</p> <p>How are training requirements addressed for contractors whose activities are associated with high-priority environmental aspects?</p> <p>Review how the Center has identified and ensured that persons are competent and aware, as appropriate.</p>	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:

<b>NASA Environmental Management System Review Checklist</b>	
<b>4.3 Communications</b>	
<b>Question:</b>	
Describe existing communications procedures for communications with internal and external parties.	
<b>Description of Observation/Finding/Other Notes:</b>	
<p>To assess the effectiveness of internal communications, review the quantity and nature of recent communications from management down and operational levels up, as well as across the organization. This should include the environmental office, as well as EMS-related communications not driven by the environmental office.</p> <p>Assess the effectiveness and access of internal communications from the environmental staff up the chain to senior management (Center Director/Deputy level).</p> <p><b>R</b> Review recent communications between the Center and outside stakeholders, including regulatory agencies. Review for examples of reactive and proactive communications and followup.</p> <p>What procedure <b>P</b> exists for communicating the Center environmental impacts to external parties?</p> <p><b>P</b> Review Center processes for communication of EMS requirements to tenants and documentation of them for contractors.</p> <p>What communications procedures are used, and do staff feel they are effective? <b>P</b> Determine if they are actually followed via review of records <b>R</b> and interviews.</p> <p><b>R</b> Review Center management's decision on communicating externally the significant high-priority environmental aspects. <b>P</b> If positive, review the process that will be utilized to communicate the aspects.</p>	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:

<b>NASA Environmental Management System Review Checklist</b>	
<b>4.4 Documentation</b>	
<b>Question:</b>	
Describe how plans and procedures are managed.	
What process is in place to ensure that all environmental handbooks, environmental management programs (EMPs), guidance materials, and standard operating procedures are complete and maintained? How are internal relationships among these documents tracked and understood?	
<b>Description of Observation/Finding/Other Notes:</b>	
Does the EMS documentation include the environmental policy, objectives, and targets; description of the scope of the EMS; description of the main elements of the EMS and their interaction and reference to related documents; documents, including records, required by this NPR; and documents, including records, determined by the organization to be necessary to ensure the effective planning, operation, and control of processes that relate to the EMS significant aspects?	
Review documentation that explains how the core Center-level EMS documents interact with and provide direction to related EMS documentation. <b>D</b>	
Review how EMS documents reference or refer to related documents, including documents with external origins.	
When reviewing EMS documents, are they mapped to EMS elements (or subelements), and has the Center identified documents that are necessary to demonstrate conformance with the EMS or ISO 14001:2004?	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:

<b>NASA Environmental Management System Review Checklist</b>	
<b>4.5 Control of Documents</b>	
<b>Question:</b>	
What process is in place to ensure that all documentation required by the EMS or this NPR is controlled?	
<b>Description of Observation/Finding/Other Notes:</b>	
<p>The Center should have a formal process for the development, approval, and maintenance of procedures and documentation. <b>P</b> Review a subset of the EMS documents <b>R</b> or <b>D</b> to determine if they are within one or more document control system, and are the current versions located where they are needed. (Review records and documentation for high-priority environmental aspects and ongoing management controls.) What evidence exists of steps being taken to ensure that only current and appropriate documents are in place, and are the steps being used? Review disposition of obsolete documents.</p> <p>Do users and authors (at Center-wide and operational control levels of the organization) understand how the document control system works, their roles, and the applicable specifics of document control requirements?</p> <p>How does the Center ensure that external origin documents are managed as EMS documents? (Review both documents that are on site but come from external sources and documents that the Center does not keep on site but has established links to as a part of the EMS.)</p> <p>How does the Center prevent the unintended use of obsolete documents and apply suitable identification to them if they are retained for any purpose?</p>	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:

<b>NASA Environmental Management System Review Checklist</b> <b>4.6 Operational Control</b>	
<b>Question:</b> Does the Center have documented procedures established and maintained to address situations where the absence of such procedures could lead to deviations from environmental policies, objectives, targets, and compliance activities? Describe how these procedures stipulate specific operating and maintenance criteria. What procedures are needed in relation to suppliers, contractors, and tenants, and how are their requirements met?	
<b>Description of Observation/Finding/Other Notes:</b> Review the listing of operational control procedures supplied by the Center for completeness and consideration of how well the procedures function as part of the management of environmental impacts and consequences. <b>D</b> When examining the procedures, look for actual operational and maintenance criteria. <b>P</b> Examine procedures associated with high-priority environmental aspects as well as medium- or low-priority aspects being managed to prevent them from becoming high priority. <b>P</b> Examine operational controls associated with identified legal and other requirements. Examine the process(es) <b>P</b> that the Center uses to decide what operational controls are required and how the adequacy of these controls is assessed and maintained. How proactive versus reactive is this process? How are operational controls <b>P</b> for suppliers and contractors developed, documented when needed, <b>D</b> and communicated (within the limits of the scope of the EMS)? Are the controls actually part of how things get done, and are the front-line individuals aware of the purpose of the controls? Where practical, interview selected contractors and suppliers. Examine how well the Center understands whether its tenancy agreements, and any informal arrangements, align with Center objectives and targets and the overall EMS. Formal records <b>R</b> of such arrangements may be appropriate. Review operational control devices that provide notification of impending or actual releases that can impact the environment.	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:

<b>NASA Environmental Management System Review Checklist</b> <b>4.7 Emergency Preparedness and Response</b>	
<b>Question:</b> Are procedures developed and maintained to prevent and mitigate environmental impacts associated with emergency situations?  How does the Center review and revise emergency response plans and procedures after an incident to address deficiencies in how environmental impacts are mitigated?  How frequently does the Center test its plan?  What environmental training exists in association with emergency response plans and procedures?	
<b>Description of Observation/Finding/Other Notes:</b> Review the emergency response plans and procedures, including any related Contingency Plans, SPCC Plans, and P2 plans. <b>P</b>  Assess the extent to which the identification of potential environmental impacts, associated with potential emergencies identified under Hazard/Threat/Vulnerability Analysis required by NPR 8715.2, has been comprehensive and how these have been considered in the development of emergency response plans and procedures.  Review what impacts in association with potential emergencies were considered in developing the aspects and impacts list for the Center and its evaluation with the risk matrix.  Examine any revisions to the plans resulting from tabletop reviews <b>R</b> , actual incidents, or new internal or external information.  How actively does the Center pursue opportunities to improve in this area? Examine the Center's annual review <b>R</b> of emergency preparedness procedures.  Review <b>R</b> or <b>D</b> the environmental component of training associated with emergency preparedness and response for impacts within the scope of the EMS.  Review records <b>R</b> of responses to recent emergencies, fire reports, inspections, mishap reports, and exercise and evaluation reports. Assess the appropriateness of measures taken to minimize or mitigate associated environmental impacts.	
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<b>NASA Environmental Management System Review Checklist</b>	
<b>5.1 Monitoring and Measurement</b>	
<b>Question:</b>	
Describe the system and documented procedures used to inspect, test, monitor, track, and measure key characteristics of operations associated with EMS objectives and targets and high-priority environmental aspects.	
Describe processes for calibration of monitoring equipment.	
<b>Description of Observation/Finding/Other Notes:</b>	
Review monitoring and measurement plans and procedures. <b>D</b>	
Was a comprehensive process undertaken to identify characteristics of operations that need monitoring or measuring? This should include contractors, tenants, and any areas where operational controls have been identified, as needed. Assess how the Center has determined what equipment and monitoring processes are critical for managing high-priority environmental aspects and for preventing others from becoming high priority. Determine how this is kept current.	
Review records <b>R</b> on progress toward meeting objectives and targets or maintenance of performance in areas already managed.	
Review recordkeeping <b>R</b> and sample records to see if monitoring is being conducted in accordance with procedures.	
Review calibration processes and records for EMS-related equipment. <b>D</b> and <b>R</b> Note: Quality management system models for calibration are one possible method to follow.	
Review how progress toward, and conformance with, objectives and targets are monitored and measured. <b>R</b>	
Review documentation <b>D</b> of information to monitor environmental performance associated with key characteristics.	
<b>Reviewer Signature:</b>	<input type="checkbox"/> Notes continued on other side <b>Date:</b>





<b>NASA Environmental Management System Review Checklist</b> <b>5.4 Control of Records</b>	
<p><b>Question:</b></p> <p>What record types and record keeping systems are in use? How does the Center identify required records and ensure that they are all properly controlled?</p> <p>How are records maintained so that they can be traced to an activity, product, or service?</p>	
<p><b>Description of Observation/Finding/Other Notes:</b></p> <p><b>R</b> Review selected EMS records in different record keeping systems, and look for consistencies in approach and controls as an indicator of maturity of systems. Auditable records include the following:</p> <ol style="list-style-type: none"> <li>1. Activities, products, and services; aspects and impacts; aspect categories; and risk matrix inputs and results.</li> <li>2. EMS training records.</li> <li>3. Compliance activity records in accordance with legal and other requirements.</li> <li>4. Calibration and maintenance records.</li> <li>5. Management review results.</li> <li>6. Results of test of emergency response procedures.</li> <li>7. Decisions with regard to external communication of high-priority environmental impacts.</li> <li>8. Changes in the documented procedures resulting from corrective and preventive action.</li> <li>9. Declaration of Conformance assessments, Center EMS reviews, and compliance reviews.</li> <li>10. External communication.</li> <li>11. Any additional records listed in the Center's records retention matrix or Center EMS procedures.</li> </ol> <p>Review records <b>R</b> maintained by NASA staff as well as contractors.</p> <p>Review records <b>R</b> associated with high-priority environmental aspects and medium- or low-priority aspects being managed to prevent them becoming high priority.</p> <p>What steps are taken to allow records to be traced to the specific activity, product, or service? Cross-check a few records to confirm that records can be traced.</p> <p>When reviewing the records retention matrix, are records mapped to EMS elements (or sub-elements). Has the Center identified records that are necessary to demonstrate conformance with the EMS or ISO 14001:2004?</p>	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:

<b>NASA Environmental Management System Review Checklist</b>	
<b>5.5 Internal Audit</b>	
<b>Question:</b>	
Describe Center internal EMS review processes.	
Describe the Center's processes for acting upon the results of compliance evaluations and external audits.	
<b>Description of Observation/Finding/Other Notes:</b>	
Review recent Center internal EMS review results. <b>R</b> Was a planned review procedure <b>P</b> used and followed? Was the process capable of providing the Center with an objective and impartial assessment of the state of the EMS? Review how any independent or external third-party assessments or audits are integrated into the Center's approach.	
How did the review assess conformance with the commitments required by NPR 8553.1 and by the Center's EMS documentation and procedures? (For example, were selected elements of the management system reviewed or were all elements reviewed? Do all operating areas of the Center come under scrutiny from time to time with emphasis on areas of environmental importance? <b>P</b> Does the procedure increase review frequency in problem areas? What model for the review process was used [e.g., the NASA example SOP or ISO 19011] (can the EMS staff articulate the rationale for how the process works?). Do reviews result in clear statements directed to affected parties as to whether the EMS is properly maintained?	
How did the results get conveyed to management?	
Are trends in EMS nonconformances identified for further examination and possible root cause analysis?	
How are findings from internal, HQ, and external audits and reviews integrated into the preventive and corrective action system?	
Examine how records <b>R</b> of EFRs and EMS reviews are kept.	
Reviewer Signature:	<input type="checkbox"/> Notes continued on other side Date:

<b>NASA Environmental Management System Review Checklist</b>	
<b>6.0 Management Review</b>	
<b>Question:</b>	
Describe the mechanism used by Center-level management to review and act upon reviews, audits, assessments, and other information deemed appropriate by management, in determining whether environmental policy, objectives, targets, or other EMS component changes are required.	
Describe communications processes and roles related to management reviews.	
Determine whether the Center has obtained third-party recognition of its EMS or issued a Declaration of Conformance.	
<b>Description of Observation/Finding/Other Notes:</b>	
In order to understand what information is provided to senior management for making decisions, follow the process of preparation of EMS information for a Center-level management review through to actions resulting from a review. Documentation of the review <b>R</b> and how changes in Center-level EMS elements are directed by management should be examined to see that top Center management is involved in the review.	
Check that a followup process occurs.	
Assess if the management review includes consideration of the following:	
<ul style="list-style-type: none"> <li>▪ Results of EMS reviews, environmental functional reviews, compliance evaluations with legal requirements, and compliance evaluations with other requirements to which the Center subscribes.</li> <li>▪ Communication from external interested parties, including complaints.</li> <li>▪ The environmental performance of the Center.</li> <li>▪ The extent to which objectives and targets have been met.</li> <li>▪ Status of corrective and preventive action.</li> <li>▪ Followup actions from previous management reviews.</li> <li>▪ Changing circumstances, including changes in applicable legal and other requirements.</li> <li>▪ Recommendations for improvement.</li> </ul>	
Review how the EMS Representative process recommends improvements to the EMS.	
Review the outputs <b>R</b> from recent management reviews to ensure they include:	
<ul style="list-style-type: none"> <li>▪ Decisions and actions to be taken.</li> <li>▪ Changes to policy, objectives targets, and all EMS elements.</li> </ul>	
If the Center has issued a Declaration of Conformance:	
<ul style="list-style-type: none"> <li>▪ Review the documentation and records to support that determination.</li> <li>▪ Verify that audit findings have been recognized by appropriate Center management.</li> <li>▪ Verify whether the Declaration of Conformance is current.</li> </ul>	
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