



NASA Policy Directive

NPD 1210.2Effective Date: January 13, 2005
Expiration Date: October 24, 2023**COMPLIANCE IS MANDATORY FOR NASA EMPLOYEES**[Printable Format \(PDF\)](#)

Subject: NASA Surveys, Audits, and Reviews Policy (Revalidated on 10/24/2017)

Responsible Office: Office of the Chief Financial Officer

1. Policy

NASA's policy is to establish minimum criteria for the conduct of Headquarters-initiated surveys, audits, and reviews (SARs) of NASA activities in such a way that the SARs are value-added and effective in support of the Agency's mission.

2. Applicability

- a. This NASA Policy Directive (NPD) applies to any SAR program conducted or sponsored by NASA Headquarters for any NASA activity, whether administrative, functional, technical, or programmatic
- b. This NPD applies to NASA Headquarters, Centers, and Component Facilities. This NPD applies to the Jet Propulsion Laboratory (JPL), a Federally Funded Research and Development Center (FFRDC), to the extent specified in its contract.
- c. This NPD does not apply to the Office of the Inspector General SARs.
- d. In this directive, all mandatory actions (i.e., requirements) are denoted by statements containing the term "shall." The terms: "may" or "can" denote discretionary privilege or permission, "should" denotes a good practice and is recommended, but not required, and "will" denotes expected outcome, and "are/is" denotes descriptive material.
- e. In this directive, all document citations are assumed to be the latest version, unless otherwise noted.

3. Authority

National Aeronautics and Space Act, 51 U.S.C. § 20113 (a).

4. Applicable Documents Documents and Forms

NPD 1280.1, NASA Integrated Management System Policy.

5. Responsibility

- a. Agency Office of the Chief Financial Officer shall establish and maintain the overall policy for the SARs program.
- b. The SAR program sponsor shall ensure that all SARs include the following components:
 - (1) Objective and Scope: Each SAR program will have a clear, documented objective and scope. The objective and scope should relate to satisfying explicit external requirements or to helping the Agency identify or mitigate risks. The objective and scope should be conveyed to each review team member and addressed at the SAR entrance conference.
 - (2) Team Composition: The size and experience of the SAR team should reflect the scope and depth of the SAR. The SAR program sponsor should maximize, to the extent feasible, the use of subject-matter experts drawn from multiple sources including Headquarters, Center(s), or contract technical experts as team members.

- (3) Coordination: Center Director(s) and the cognizant Mission Directorate Associate Administrator will be notified of SARs, providing sufficient time to adjust schedules or other factors as necessary. SAR activities may be further coordinated with the relevant Center Director(s) or their designees.
- (4) Criteria: SARs will be conducted in accordance with written criteria, checklists, or protocols based on appropriate requirements documents (e.g., NPDs, NPRs, Federal regulations) provided to Center Directors, or their representatives, during pre-coordination. The criteria should include review of previous findings, their corrective actions, and an evaluation of the continued effectiveness of those corrective actions.
- (5) Communication: To maximize the added value of SARs, continuous communication should take place throughout the conduct of SARs. The SAR team should conduct entrance and exit conferences and frequent debriefs with the Center Director or designated representatives. The SAR team should disclose any and all preliminary observations, findings, and recommendations at the time of the exit conference, except where sensitivity concerns dictate otherwise. Written materials and/or a draft report concerning the findings and recommendations should be provided at the exit conference.
- (6) Findings: All SAR findings should be written, readable, and factual. In addition, the following factors should be considered:
- (a) Findings should be objective and impact assessment accurately stated.
 - (b) The use of gratuitous findings (things the relevant program manager had already identified and was working on effectively) should be minimized, but may be used in order to document and acknowledge work in progress.
 - (c) Repeat findings should be highlighted for the benefit of Center Senior Management.
 - (d) The SAR team should identify information which may be useful to the Center's root cause analysis efforts.
 - (e) The SAR team should look for, and document, positive observations as well as findings.
 - (f) The SAR team should highlight potential best practices for the benefit of Center Senior Management and for dissemination to other Centers.
- (7) Findings and Recommendations: The SAR team should clearly distinguish between findings (citing an explicit requirement and its rationale) and recommendations (providing the review team's rationale, such as knowledge of someone else's best practice; avoiding subjective personal opinion).
- (8) SAR Critique: After each SAR, the SAR program sponsor may ask the relevant program manager and Center Senior Management to assess the value of the SAR. The response should be provided to each SAR team member, the team leader, and the SAR program sponsor.
- (9) SAR Follow through: All SAR programs will have an established process and schedule to document closure of all findings. Corrective/preventive actions to close the findings and notification of the results of the recommendations should be provided by the Center to the SAR program sponsor. SAR program sponsors should track through closure all actions in response to findings. On an annual basis, SAR program sponsors should notify the Center Director or designated representative and the cognizant Mission Directorate of the status of SAR actions versus findings.
- (10) SAR Program Analysis:
- (a) SAR program sponsors should periodically analyze and document the analysis of SAR programs conducted. The analysis should address recurring or common problem areas disclosed by the SARs, solutions that worked, potential best practices identified, and results of Center SAR critiques. This analysis should be provided to relevant Center organizations, the Associate Administrator of the SAR program sponsor's organization, and to the Assistant Administrator Infrastructure and Administration.
 - (b) SAR program sponsors should adjust future SARs accordingly based on the analysis required above. This can include refinements to an effective SAR program including additional attention to previously discovered problem areas, consolidation with another SAR program, or discontinuation of the SAR program.
- (11) The SAR program sponsor should provide sufficient time prior to the SAR for Centers to perform self-assessments, using provided criteria and results of SAR program analyses. These Center self-assessments are for the use of the Center and should not be used by the SAR team as a point of departure for the SAR.
- (12) Requests for waivers, deviations, and equivalency associated with this policy should be submitted in writing to the Assistant Administrator, Office of Strategic Infrastructure for review and approval.

6. Delegation of Authority

None.

7. Measurement/Verification

In accordance with NPD 1280.1, SAR program sponsors shall develop, maintain, and communicate balanced measures for work for which they are responsible and accountable.

8. Cancellation

NPD 1210.2, NASA Surveys, Audits, and Reviews Policy, January 13, 2005.

REVALIDATED 10/24/2010, ORIGINAL SIGNED BY:

/s/ Sean O'Keefe
Administrator

Attachment A. (Text)

Definitions:

Finding: A noncompliance or nonconformance with a statute, regulation, or NASA requirement..

Observation: Information regarding an event or condition during a SAR, recorded for explanatory purposes, and not requiring or recommending action.

Recommendation: Information regarding events or conditions that may be improved in effectiveness or efficiency, based on other Center practice(s), auditor experience, or other information. Recommendations require prudent consideration by Center management; however, corrective action is at the discretion of Center management.

Repeat Finding: A finding that is significantly similar to finding(s) from a previous SAR. Repeat findings may indicate systemic conditions or ineffective mitigation efforts with respect to the original finding.

SAR Program: A planned series of SARs conducted at two or more NASA Installations by a SAR sponsor in order to support administrative, programmatic, technical, or functional requirements. Examples of SAR programs include procurement management surveys, functional reviews, or the Operations and Engineering Panel reviews. Single-event SAR, single- site SAR, Center internal SAR, mishap investigations, and routine program/project management reviews are examples of assessments not included in a SAR program.

SAR Program Sponsor: Organization at NASA Headquarters sponsoring or managing the SAR program.

Surveys, Audits, and/or Reviews (SAR): An onsite assessment of a function, project, or program conducted at a NASA Installation by (or on the authority of) NASA Headquarters.

(URL for Graphic)

None.

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