

### NSF-ISR, LTD SURVEILLANCE AUDIT REPORT

A. Program Participant's Name: Wisconsin DNR State Forest System

B. Operation(s) within the scope of SFIS Surveilla	nce Audit:
FRS #1 : 1Y941	FRS#2
Location: Madison, WI	
FRS #3:	FRS #4:
Location:	Location:
C. NSF Audit Team:	
Lead Auditor: <u>Mike Ferrucci</u>	Auditor: <u>Dr. Robert Hrubes</u>
D. Audit Date(s): October 12-14, 2004	
E. Scope:	
<ul><li>No Change</li><li>☐ Changed (see Section H, revised scope statem</li></ul>	ent noted on FRS)
F. Reference Documentation:	
2002-2004 SFI Standard® Company SFI Documentation:	Rev. Level: 2002-2004 Date Revised: June 2002
G. Audit Results: Based on the results at this visit	t, the auditor concluded
Acceptable with no nonconformances; or	
Acceptable with minor nonconformances that should be	e corrected before the next regularly scheduled surveillance visit;
☐ Not acceptable with one or two major nonconformance	es - corrective action required;
Several major nonconformances - the certification may	be canceled unless immediate action is taken
Company Representative:	Date: October 14, 2004
NSF-ISR Representative:	Date: October 14, 2004
This acknowledges the NSF-ISR Audit Team's visit to this locati	on and the SFI Program Participant's receipt of this report.

H. Changes to	Operations or to the SFI Standard
Are there	any significant changes in operations, procedures, specifications, FRS, etc. from the previous visit?
	vide details of the changes:  agh there are many modest changes (refer to Appendix V: Audit Matrix)
I. Corrective A	ction Requests: (see Appendix IV)
	ect Action Requests Issued this visit: te five existing CARs were not closed, but progress has been made on all (refer to Appendix V: Audit Matrix)
CARs Correc The an	Corrective Action Plan is not required.  etive Action Plan is required within sixty days of this visit (for Minor Nonconformances).  will be verified during the next Surveillance Audit.  etive Action Plan is required within thirty days of this visit (for Major Nonconformances).  additor will make arrangements to verify the corrective action has been effectively implemented. All major informance(s) must be closed by the auditor prior to the next scheduled surveillance audit by a special eation visit or by desk review, if possible.
NSF-1	sctive Action Plans should be mailed to: SR, Ltd. or Name: Mike Ferrucci ss: 175 North Main Street, Branford, CT 06405
At the conclusion	of this Surveillance Audit visit, the following number of CARs remain open:
MAJOR	(S): MINOR(S): <u>5</u>
In additi	on, no new Opportunity(ies) For Improvement (OFIs) were identified.
Appendices: Appendix I: Appendix III: Appendix IV: Appendix IV: Appendix V:	Surveillance Audit Schedule and Notification Letter Agreement to Not Consult and to Not Disclose Attendance Sheets Corrective Action Requests Audit Matrix



# Surveillance Audit Schedule and Notification Letter

October 10, 2004

Paul Pingrey Bureau of Forest Management WI Department of Natural Resources PO Box 7921, Madison, WI 53707-7921

Re: Confirmation of SFI Standard Surveillance Audit

Dear Mr. Pingrey:

I am scheduled to conduct the Surveillance Audit of the Wisconsin State Forest System on October 11 to 14, 2004. This is a partial review of your SFI Program to confirm that it continues to be in conformance with the SFI Standard and that continual improvement is being made.

The audit team will consist of Mike Ferrucci, NSF-ISR Lead Auditor and Robert Hrubes, Team Member.

During the audit we will:

- 1. review progress on achieving SFI objectives and performance measures and the results of the management review of your SFI Program;
- 2. review selected components of your SFI program
- 3. verify effective implementation of the corrective action plans from the previous NSF audit; and
- 4. evaluate the effectiveness of planned activities aimed at continual improvement of your SFI Program;

The enclosed tentative schedule outlines the topics I expect to review during this visit. It is based on our previous discussions and correspondence, and includes most of the information you have already provided to your team. The schedule can be adapted on-site to accommodate any special circumstances.

I look forward to visiting you and evaluating continual improvement in your SFI Program. If you have any questions regarding this planned audit, please contact me.

Sincerely yours,

Mike Ferrucci Lead Auditor, NSF-ISR, Ltd.

Enclosure: Wisconsin State Forest Annual Surveillance 2004 Audit Plan

#### Wisconsin State Forest Annual Surveillance 2004 Audit Plan Wisconsin State Forest System – Facility # 1Y941 Sustainable Forestry Initiative Standard (2002-2004)

NSF-ISR Audit Team: Mike Ferrucci, Dr. Robert Hrubes

10/11 (Monday) - Auditors arrive in Spooner.

9 p.m.: DNR provides a briefing on CAR progress to date.

**10/12** (**Tuesday**) - Brule River State Forest - all day - Start Time: 8:30 A.M. (Lodging in Spooner - American Heritage Best Western)

**10/13** (Wednesday) - Flambeau River State Forest - all day - 8:30 A.M. (Lodging in Spooner - American Heritage Best Western)

**10/14** (**Thursday**) - Governor Knowles State Forest - 7 A.M. to about 11 A.M. Travel to Eau Claire, with exit report to Forestry Leadership Team about 1 p.m. to 3 p.m. Mike and Robert need to leave promptly at 3 p.m. in order to make travel connections.

#### **Daily forest visits to include:**

- Office briefing in morning (usually about 1.5 hours). Key forest management, recreation, wildlife/fishery and law enforcement personnel should be on hand.
- Field stops: active timber sales, recently closed sales, issues from initial audit.
- Special sites demonstrating recreation, historic, or ecological sites or management activities.

#### **Information Needed:**

Regarding information packets on the timber sales, property managers should include the following in the folders: 2460-1 Timber Sale notice & cutting report

- 2460-1A Timber Sale narrative
- Timber Sale map
- In addition, have a general timber sale prospectus available for one of your bid openings and an overall county map showing the location of the timber sales. Please prepare 6 copies of this material (for the audit team and DNR central office staff) and however many copies you feel you need for local staff. Whoever the lead person was on setting up each sale should be available (if possible) for the audit.

The following items have been received by both auditors:

- 1. List of timber sales (active and recently completed)
- 2. Timber sale contractor contact information (and other contractors)
- 3. Property Master Plans (hard copy for Governor Knowles and Flambeau River, Internet link for Brule)

#### **Logistics**

- Lodging in Spooner: American Heritage Best Western (M, T, W).
- Thursday exit report: The Plaza Hotel, 1202 W Clairemont Ave., Eau Claire (ph. 715-834-2559; www.plazaeauclaire.com).
- Forest Superintendents are to arrange box lunches for the auditors 2 and central office staff 4 (and local staff, if desired).
- State Forests should arrange 4x4 transportation for the auditors and central office staff if needed.

DNR Central Office contingent to include Bob Mather, Jim Warren, Teague Prichard and Paul Pingrey.

#### **Issues to Be Covered During Audit**

#### DNR Update Briefing, Opening Meeting Issues

- Changes to the Facility Record Sheet
- Changes/improvements to the SFI Program, changes in operations, or changes in scope since the certification audit (Verify SFI Documentation Revisions)
- Implementation of corrective action plans from the previous certification audit.

#### SFI Program Review Issues

Although any SFI requirement can be covered, the following are the focus of the audit:

Objective 1	
4.1.1.1.1.	Policies
4.1.1.1.4	Sustainability
	•
Objective 2	
4.1.2.1.1	Reforestation
4.1.2.1.2	Reporting
4.1.2.1.4	Forest & Soil Productivity
4.1.2.1.5	Forest Protection
4.1.2.1.6	Genetics & Biotechnology
Objective 3	
4.1.3.1.1	Best Management Practices
4.1.3.1.2	Riparian Protection Measures
4.1.3.1.3	Research
4.1.3.1.4	Training
	_
Objective 5	
4.1.5.1.1	Policies
4.1.5.1.2	Clear-cut Size
4.1.5.1.3	"Green Up"
4.1.5.1.4	Landscape Diversity
	*

### SFI Program Review Issues (continued)

Objective 7 4.1.7.1.1	Efficient Utilization
Objective 8	
4.2.1.1.2	Professionalism of Wood Producers
4.2.1.1.3	Annual Reporting
4.2.1.1.4	Use of Qualified Professionals
4.2.1.1.5	Communications
Objective 9	
4.3.1.1.1	Report compliance with SFIS
Objective 10	
4.3.2.1.1	Mechanisms for Public Outreach
4.3.2.1.2	Inconsistent Practices
Objective 11	
4.4.4.1.1	Management Review System



## Agreement to Not Consult and to Not Disclose



### Attendance Sheets



# **Corrective Action Requests**

Corrective And Preventi	ve Action Request (CAR)
Company/Location: Wisconsin DNR, Madison, WI	Date: <u>12-02-03</u> <b>FRS</b> # <u><b>1Y941</b></u>
Auditor: Mike Ferrucci	Finding Number: same
Location of Finding: Office, Madison WI	CAR Number: ORR-2003-01 revised
Discussed with: WI DNR Audit Team	Previous CAR Number/Date: OR <u>R-2003-01 / 10-17-03</u>
<b>AUDITOR FINDING:</b> Standard Number and Clause: 4.1.1.1.1 CI1 & 3; 4.1.2.1.1 CI1; 4.1.3.1.1 CI1; 4.1.5.1.2 CI1; 4.2.1.1.2 CI1; 4.2.1.1.4 CII (all relating to policies).	
(NSF-ISR Policy or Company procedure, if applicable) Policies are not specific to all relevant SFI Objectives or Performance Measures including: general SFI policies and assignment of SFI roles and responsibilities (4.1.1.1 CI1 & 3); Policy on time frame for reforestation (4.1.2.1.1 CI1); Policy on BMP use for all phases of operations (4.1.3.1.1 CI1); Policy to report on clearcut size and number (4.1.5.1.2 CI1); Policy to support training of loggers (4.2.1.1.2 CI1); and Policy to promote the use of trained professionals (4.2.1.1.4 CI1).	
Major Nonconformity <u>Minor Noncon</u>	<u>formity</u>
Company Representative's Signature: (Note: Copy signed by Ro	obert Mather, WIDNR, is on file at NSF.)
IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:  1) ROOT CAUSE ANALYSIS BY COMPANY – Include potential causes and assurance that problem does not exist in other areas.  While it is understood that the WDNR Division of Forestry is implementing and achieving many of the SFIS Objectives and Performance Measures, there has been, to date, no need to have written policy to that effect. Similarly staff roles and responsibilities have not been identified and communicated since the Division is just now pursuing SFI Certification.  2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.  The Division of Forestry will immediately apply to the AF&PA for SFI program participation. If accepted, the Division of Forestry will sign the license agreement upon the approval of the Wisconsin Natural Resources Board (NRB). The NRB resolution will confirm the Department's commitment to follow the 2002-2004 SFI Standard® policies, objectives and performance measures. Within six months of certification, the WDNR Division of Forestry will develop and implement a State Forest handbook revision to clarify policy issues concerning reforestation, BMP use for operations, clear cut size and number, training loggers and promoting the use of trained professionals. The Division will update and incorporate staff roles and responsibilities for SFIS Objectives within the Division's consistency plan. In addition, the Forestry Division Leadership Team will work with The Regional Forestry Leaders to ensure that roles and responsibilities identified in the consistency plan are included in annual work plans, understood, implemented and reported. Long term, the Division will also seek an additional staff person to lead and coordinate efforts within a forest certification program through a 2005-2007 Budget Initiative.  3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following a	
standards. Continually update staff work plans to further define rethe State Forest staff during the fall 2004 all State Forest staff me	roles and responsibilities. Provide initial SFI Program training to
Company Representative's Signature: (Note: Copy signed by R	obert Mather, WIDNR, is on file at NSF.) Date:
AUDITOR REVIEW OF COMPANY'S PLAN: Comments: Plan meets identified issues, and will be reviewed du	ring Surveillance Audit.
STATUS: OPEN AUDITOR REVIEW OF COMPANY'S COMPLETED ACT Comments: 2004 SA: Although progress has been made (DNR is	
and occurred before the one-year time period. This CAR is to be	e reviewed during next Surveillance Audit, scheduled for the
summer of 2005. Some changes to SFIS requirements will take e	effect with the 2005-2009 SFIS.
STATUS: OPEN	AUDITOR/DATE: Mike Ferrucci, 10-14-04

Corrective And Freventi	ve Action Request (CAR)
Company/Location: Wisconsin DNR, Madison, WI	Date: <u>10-17-03</u> <b>FRS # 1Y941</b>
Auditor: Mike Ferrucci	Finding Number: same
Location of Finding: Office, Madison WI	CAR Number: ORR-2003-02
Discussed with: WI DNR Audit Team	Previous CAR Number/Date:
AUDITOR FINDING: Standard Number and Clause: 4.2.1.1.5	Communication of SFI Commitment
(NSF-ISR Policy or Company procedure, if applicable) CI #1 is not fully implemented. There is currently no policy of commitment to the SFIS (see ORR-2003-01) so there is no communication.	
Major Nonconformity <u>Minor Nonconformity</u>	
Company Representative's Signature: (Note: Copy signed by Re	obert Mather, WIDNR, is on file at NSF.)
IF NECESSARY, PLEASE ATTACH A SEPARATE REPORT ADDRESSING THE FOLLOWING THREE ITEMS:  1) ROOT CAUSE ANALYSIS BY COMPANY – Include potential causes and assurance that problem does not exist in other areas.  Since the Wisconsin DNR hasn't yet committed to SFI certification, there has been no policy to communicate.  2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.	
Wisconsin DNR will present a resolution for adoption by the Natural Resources Board recognizing the Department's commitment to the SFIS. The policy would be documented in the appropriate DNR Manual Code Handbooks and communicated to Department staff, partners and stakeholders by memoranda and news releases. The Forestry Leadership Team would deal with the policy as an action item. Training will be provided to staff members to explain the Department's commitment to forest certification and their roles in implementing the program.	
3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.	
Communication of SFIS principles will be included as a topic for state in a three-year cycle.	the Regional program reviews, which are completed across the
Company Representative's Signature: (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) Date:	
AUDITOR REVIEW OF COMPANY'S PLAN:  Comments: Plan meets identified Minor non-conformance; also helps with ORR-2003-01	
STATUS: OPEN AUDITOR REVIEW OF COMPANY'S COMPLETED ACT Comments: 2004 SA: Although progress has been made the plan was optional and occurred before the one-year time period. This scheduled for the summer of 2005 STATUS: OPEN	allowed for work during the 3-year recertification cycle. The SA
LEGEND FOR STATUS: OPEN = CA Plan Accepted CLOSED = CA implemented, verified & accepted REJECTED = C/A Plan or Implementation rejected	

Corrective And Freventi	ve Action Request (CAR)
Company/Location: Wisconsin DNR, Madison, WI	Date: <u>10-17-03</u> <b>FRS</b> # <u><b>1Y941</b></u>
Auditor: Mike Ferrucci	Finding Number: same
Location of Finding: Office, Madison WI	CAR Number: ORR-2003-03
Discussed with: WI DNR Audit Team	Previous CAR Number/Date:
AUDITOR FINDING: Standard Number and Clause: 4.3.1.1.1	CI #2 "Report annually"
(NSF-ISR Policy or Company procedure, if applicable) There are currently no past surveys that have been completed as WI DNR is a new Program Participant. WI DNR does many other "non-SFI" activities to report on their progress in "fulfilling their commitment to sustainable forestry".	
Major Nonconformity Minor Noncon	<u>formity</u>
Company Representative's Signature: (Note: Copy signed by R	obert Mather, WIDNR, is on file at NSF.)
IF NECESSARY, PLEASE ATTACH A SEPARATE REPO	RT ADDRESSING THE FOLLOWING THREE ITEMS:
<ol> <li>ROOT CAUSE ANALYSIS BY COMPANY – Include pot areas.</li> </ol>	ential causes and assurance that problem does not exist in other
Wisconsin DNR has not previously been certified by SFI, consec	quently we have not completed the annual SFI survey
questionnaire for the State Forests.	
-	
2) CORRECTIVE ACTION BY COMPANY – Based on the planned/taken to correct the problem. Please include expecte	
The WDNR Division of Forestry will pursue development and in	-
Sustainable Forestry Board. The MOU will outline the Division's commitment to SFI, including the agreement to promptly	
complete and respond to the annual SFI survey for our State Forests. The MOU will be completed within one year's time.	
a) PDEVENTRALE A CENTON DV COMPANY D	
3) PREVENTIVE ACTION BY COMPANY – Based on the I planned/taken to correct the problem. Please include expecte	
If the decision is made to follow through with SFI certification, V	VDNR will complete the corrective action listed above.
Company Representative's Signature: (Note: Copy signed by R	cobert Mather, WIDNR, is on file at NSF.) Date: 01-16-04
AUDITOR REVIEW OF COMPANY'S PLAN:	
Comments: Minor programmatic issue easily resolved by propos	ed actions.
CTATUS ODEN	AUDITOR/DATE: Mike Ferrucci 1-26-04
STATUS: OPEN AUDITOR REVIEW OF COMPANY'S COMPLETED ACT	TION:
Comments: 2004 SA:. The SA was optional and occurred before	
Annual Survey. This CAR is to be reviewed during next Survei	
STATUS: <u>OPEN</u>	AUDITOR/DATE: Mike Ferrucci, 10-14-04
<b>LEGEND FOR STATUS: OPEN</b> = CA Plan Accepted <b>REJECTED</b> = C/A Plan	<b>CLOSED</b> = CA implemented, verified & accepted or Implementation rejected

Company/Location: Wisconsin DNR, Madison, WI	Date: <u>10-17-03</u> <b>FRS # 1Y941</b>
Auditor: Mike Ferrucci	Finding Number: same
Location of Finding: Office, Madison WI	CAR Number: ORR-2003-04
Discussed with: WI DNR Audit Team	Previous CAR Number/Date:
AUDITOR FINDING: Standard Number and Clause: 4.4.4.1.1	CI#2 and CI #3
(NSF-ISR Policy or Company procedure, if applicable) WI DNR has a fully functioning management system that includes and drives "Continual Improvement". This system does not currently include "SFI Objectives & Performance Measures" nor "continuing SFI conformance".	
Major Nonconformity <u>Minor Nonconformity</u>	
Company Representative's Signature: (Note: Copy signed by Re	obert Mather, WIDNR, is on file at NSF.)
IF NECESSARY, PLEASE ATTACH A SEPARATE REPO	RT ADDRESSING THE FOLLOWING THREE ITEMS:
1) ROOT CAUSE ANALYSIS BY COMPANY – Include pot areas.	ential causes and assurance that problem does not exist in other
Since the Wisconsin DNR hasn't yet committed to SFI certification	on, there has been no reason to incorporate it in the management
system.	
2) CORRECTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.	
Within the first year of committing to SFI certification, the Department will adapt its internal monitoring system to include SFI Objectives and Performance Measures and continuing SFI conformance. The procedures will assure that the appropriate technical specialists (wildlife biologists, BMP specialists, etc.) are included on the State Forest audit teams. Currently, State Forest audits are required in any year that harvests exceed \$100,000 in value (which includes most of the properties), but two years is the longest cycle.	
3) PREVENTIVE ACTION BY COMPANY – Based on the Root Cause Analysis, the following action has been planned/taken to correct the problem. Please include expected completion date.	
The policy to include SFI conformance in the State Forest audits	will be added to the Operations Handbook.
Company Representative's Signature: (Note: Copy signed by R	Robert Mather, WIDNR, is on file at NSF.) Date:
AUDITOR REVIEW OF COMPANY'S PLAN: Comments: Plan covers identified minor non-conformance; linka	age into ongoing management review is critical.
STATUS: OPEN	
AUDITOR/DATE: Mike Ferrucci 1-26-04	
AUDITOR REVIEW OF COMPANY'S COMPLETED ACTION:  Comments: 2004 SA: Although some progress has been made the approved plan allowed for one year to complete corrective	
actions. The SA was optional and occurred before the one-year ti	me period. This CAR is to be reviewed during next
Surveillance Audit, scheduled for the summer of 2005	
STATUS: OPEN	AUDITOR/DATE: Mike Ferrucci, 10-14-04
I FCEND FOR STATUS OPEN - CA Plan Accepted	CLOSED - CA implemented varified & accented

**LEGEND FOR STATUS: OPEN** = CA Plan Accepted

**CLOSED** = CA implemented, verified & accepted

CA Plan Accepted CLOSED = C

REJECTED = C/A Plan or Implementation rejected

Company/Location: Wisconsin DNR, Madison, WI	Date: <u>11-12-03</u> <b>FRS</b> # <u>1Y941</u>
Auditor: Mike Ferrucci	Finding Number: same
Location of Finding: Flambeau River State Forest Sale 585	CAR Number: <u>RA-2003-05</u>
Discussed with: WI DNR Audit Team	Previous CAR Number/Date:
AUDITOR FINDING: Standard Number and Clause: 4.1.2.1.4	- CI 4 & 4.1.3.1.1 P.M. and CI 1
(NSF-ISR Policy or Company procedure, if applicable) At FRSF Sale 585 the portion of the access road owned by Wisconsin is rutted, eroding, and being abused by uncontrolled access by recreational users, exacerbated by use during an active logging job. The definition for a permanent all-season forest road applies, as there is no closure. This road bisects a depressional wetland. The road does not have BMP recommended drainage or surface: BMP Manual provisions, page 29: "surface the road with gravel where steep grades, erodible soils, or high traffic volume make the potential for surface erosion significant"; and drainage structures "where necessary to protect water quality, install road drainage structures to remove storm water or seepage from the road surface". 4.1.3.1.1 CI 1 "Written policy to implement state BMPs during all phases of management activities." is not in place.	
Major Nonconformity <u>Minor Noncon</u>	<u>formity</u>
Company Representative's Signature: (Note: Copy signed by Re	obert Mather, WIDNR, is on file at NSF.)

IF NECESSARY, PLEASE ATTACH A SEPARATE REPO	ORT ADDRESSING THE FOLLOWING THREE ITEMS:
1) ROOT CAUSE ANALYSIS BY COMPANY – Include po	tential causes and assurance that problem does not exist in other
areas.	-
This particular road has a long-term history of use by recreation	
address maintenance needs and efforts were made to close the re-	
proposal and applied political pressure to keep the road open. L	ater, funding for maintenance projects on the state forests were
eliminated by state budget cuts.	
	-
2) CORRECTIVE ACTION BY COMPANY – Based on the	
planned/taken to correct the problem. Please include expecte	
Within one year, funding from operational funds will be identified	
addition, the FRSF will explore opportunities to reshape this par	
diversion structures, and surface a portion of the road with grave	
	funds necessary to support the expense to reshape and surface year
	entory and establish a maintenance rotation to review and to repair MP training session for State Forest managers to reinforce BMP
standards and share road development practices.	MP training session for State Potest managers to reinforce DMP
The long-term plan to address roads is to restore and seek fundi	ng for maintenance projects on state forests through a 2005-07
Budget Initiative.	
3) PREVENTIVE ACTION BY COMPANY – Based on the	Root Cause Analysis, the following action has been
planned/taken to correct the problem. Please include expecte	
We are currently in the process of monitoring the implementation	on and effectiveness of all BMPs on state forests to assess BMP
performance across state forests. We specifically have contracted randomly selected sites. This monitoring approach will identify	ed with a private vendor who is in the process of monitoring 28
	the Master Planning process. The Master Plan for the Flambeau
River State Forest is scheduled to be rewritten in the next five y	
concern will be addressed as needed. The next Master Plan will	
vehicles. Development of this Plan is 3-5 years down the road.	
with protecting water quality while still providing recreational of	
include developing a state forest based road inventory system th	
repair the state forest road infrastructure. As previously mention	ned, funding will be requested in the 2005-2007 biennium.
Company Representative's Signature: (Note: Copy signed by Robert Mather, WIDNR, is on file at NSF.) Date:	
	NODERT WIGHTER, WIDNER, IS ON THE at INST.) Date.
AUDITOR REVIEW OF COMPANY'S PLAN:	Il inflyance the need for an aits visits to confirm competitive
Comments: Amount of increased funding, fully documented, wi	il influence the need for on-site visits to confirm corrective
actions.	
STATUS: OPEN AUDITOR REVIEW OF COMPANY'S COMPLETED AC	AUDITOR/DATE: Mike Ferrucci 1-26-04
Comments: 2004 SA: excellent and thorough repair/reconstruction	
items remain - to be reviewed during next Surveillance Audit, s	cheduled for summer of 2005.
STATUS: OPEN	AUDITOR/DATE: Mike Ferrucci 10-14-04
ECEND FOR STATUS, ODEN - CA Dian Assented	CLOSED - CA implemented varified & accounted



### Audit Matrix