Writing Quality Comments

Comment Guidelines

Auditors must provide comments to clearly justify the scoring for documentation, observation, and interview audit questions.

Comments **must:**

- clearly identify the verification technique required.
- answer the question.
- justify the points awarded.
- give at least one company specific example.
- be professional in style and content.

If more than one verification technique is required to score a question, the comment must indicate the results of each technique.

Comments **must not:**

- refer to a specific employee.
- state the auditor's personal opinion.
- restate the question justifying the score awarded.
- contradict information within the question and related questions.
- be boilerplated or templated (see below).

> **Boilerplating**
> This practice involves copying all or a portion of an audit report from one audit and then reusing it for another audit, making few changes.
>
> **Templating**
> This practice involves using prewritten notes and recommendations for multiple audit reports. These notes and recommendations may include specific findings, but are for the most part unoriginal.

Confirming Verification Techniques

Auditors must provide examples of the required verification techniques in comments. The boxes below show examples of acceptable comments.

Documentation:

Refer to the documents read during the audit.

> *Hazard assessments reviewed confirm that workers use an ongoing hazard assessment process daily. Hazard Assessments indicate reassessment of hazards when jobs or tasks changed.*

Observations:

Describe what was seen on the observation tour. Connect the observation comment to a task performed whenever possible.

> *Workers observed wearing high visibility vests when directing traffic and safety glasses and face shields when grinding during site tour.*

Interviews:

Summarize what the interviewees said.

> *Workers stated during interviews that safety meetings are not taking place each morning as per the company policy.*

Note: Comments are required only for interview questions when points **not** awarded.

Comments for Not Applicable (N/A) Questions

Comments are required for all questions considered Not Applicable (N/A) and must clearly identify the reason for the allocation of the N/A.

Question 2.10
Does the company have a process for evaluating/monitoring sub-contractors?

Score: N/A

> *This question is not applicable to the audit. ABC Inc. does not hire subcontractors.*

Comment Writing Examples

The following are examples of acceptable comments from the NSNY Audit Tool: **Question 2.7**

Element 2: Workplace Hazard Assessment and Control (cont'd)	Score	Technique Employed			Points Awarded
		D	O	I	
2.7 Are controls developed for identified hazards?	3	▢			
Comments:					

Guideline (2.7)

Once identified, hazards must be controlled using the hierarchy of controls. The hierarchy of controls are elimination of the hazard, substitution, the use of engineering controls (a physical object or device that reduces a persons exposure to a hazard. e.g. machine guard, hand rail, ventilation system), administrative controls (e.g. safe work practices, safe job procedures, and rules), personal protective equipment, or a combination of control methods.

Acceptable comment - Points Awarded

Project Hazard Assessments and Site Specific Hazard Assessments reviewed indicate engineering, administrative, and PPE controls are in place.

Examples included:

- *Guards are on grinders (Engineering)*
- *Training is required to operate equipment (Administrative)*
- *Safety glasses are required in all field operations (PPE)*

Acceptable comment - Points Not Awarded

Formal and Site Specific Hazard Assessments reviewed indicate that the required engineering, administrative, and PPE controls were not implemented.

Examples of required controls not implemented include:

- *Training required to operate equipment (Administrative)*
- *Safety glasses not identified as required on the JHA for grinding*

> **Best Practice**
> Always review the NSNY Audit Guidelines before and after writing comments

Question 10.8

Element 10: Investigations and Incident Reporting (cont'd)	Score	Technique Employed		Points Awarded
10.8 Are recommendations for prevention/remedial action implemented in a timely manner?	4	☐▼	AND ☐	
Comments:				

Guideline (10.8)

Investigations should identify the DIRECT (immediate) and/or INDIRECT (underlying) causes with recommendations of corrective actions for the prevention of re-occurrence. Once identified, a system to follow up on the recommendations is required. Verify through documentation and interviews that this process is in place and that corrective action is taking place within an acceptable time frame. If no investigations have been carried out yet, no points can be awarded for this question.

Acceptable comment - Points Awarded

Investigation reports reviewed identify corrective actions are being completed and implemented in a timely manner. Interviews indicated that workers were aware of the corrective actions resulting from incident investigations.

> *Examples included: review safe work practices with employees and use of tag lines with suspended loads.*

Acceptable comment - Points Not Awarded

Investigation reports reviewed did not identify corrective actions. This section is not being filled out on the investigation forms. Interviews indicated that workers were unaware of corrective actions resulting from incident investigations.

Executive Summary

When completing the Executive Summary it is important to include some brief information on the company (what kind of work they do, what work did you observe being done during the audit as part of your observational tour).