

Verification Body Best Practices

Third Party Verification Program

This document describes best practices observed by DEQ during audits of verification services provided by our approved verification bodies. It is updated as new best practices are observed.

General best practices for verification bodies:

- VB has an organized and consistent filing system for verification records. Each folder follows a template which allows verification staff to easily find files.
- Verification teams are comprised of approved verifiers with the correct sectoral expertise for each verification and the VB has a bench of available approved verifiers to step in, in case of scheduling conflicts.
- VB uses discretionary onsite visits during less intensive verification years when there have been significant staffing changes at the entity from the prior year.
- If it is the entity's first year being verified, the VB communicates clearly with the client upfront about the time commitment and expense associated with verification, and that this may increase with the VB's assessment of risk associated with misreported data.
- VB requests company organizational charts annually to determine if there have been any shifts that would impact the conflict of interest assessment.
- VB keeps apprised of updates to rules across various jurisdictions by subscribing to agency listservs, attending agency trainings, and saving any issued guidance to their internal files for staff reference.
- VB correctly references the official versions of DEQ rules directly from the Oregon Secretary of State website, and not external resources.
- VB appropriately directs entities to DEQ with questions related to regulatory interpretation, disagreements about reported data, and verification applicability questions.

Best practices for verification and data checks:

- VB performs year over year emissions data review to note any significant changes and identify new emissions sources.
- When evaluation of requested data leads to the discovery of discrepancies, the VB appropriately updates the qualitative assessment of risk in its sampling plan for that data type
- VB asks to review all fuel types, to ensure no required types were missed in the reporting.
- VB asks detailed questions of the entity regarding reporting exemptions and how they are supported by evidence.
- VB cross checks onsite meters with utility meters to locate discrepancies in reported values.
- VB checks serial numbers of meters and other equipment to account for any new installations.

- VB plans for a facility walkthrough near the beginning of a site visit, so that if questions arise in talking with facility managers there is time to walk through them during the remainder of the visit.
- If verifying quarterly fuel transactions, VB samples records from the change of quarter/change of year to ensure transactions are being recorded in the correct timeframe.
- If the entity is reporting emissions under multiple EPA subparts, the VB includes an assessment of risk associated with data reported under each subpart.

Best practices when writing a verification report:

- VB does not just list requirements of the regulation, but describes in detail how these requirements were met during verification. Focus is more on the “how” than the “what”.
 - For example: Rather than “VB reviewed data associated with fuel purchases”, say instead “VB sampled 10 Bills of Lading from each quarter of data reported and confirmed purchased volumes were consistent with line items in the entity’s summary reporting spreadsheet”.
- Rule references included in the verification report are specific to Oregon regulations and do not assume that the language in Oregon Administrative Rules is identical to similar regulations in other jurisdictions (e.g. CARB Mandatory Reporting Rule).
- VB includes a Summary of Review in the verification report, which gives a high-level overview of the relevant points of review for each verification and a brief description of how review was conducted for each relevant point listed. Additional detail is included later in the report or as an attachment, as is appropriate under the requirements of OAR 340-272.
- VB breaks out the detailed comparison of data checks so that each source is a different line item.

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