
**2009 Archaeology Audit Program
Procedure Manual**

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1.0 Introduction and Scope

The Oil and Gas Commission's (OGC/Commission) Archaeology Audit Program (AAP) will conduct effectiveness auditing by ensuring that industry's processes are achieving the desired outcomes as described in the *BC Oil and Gas Commission Guidelines for Performance-Based Approach to Archaeological Assessments (Guidelines)*.

In October of 2004, the OGC introduced a performance-based approach to archaeological assessments. Under this system, oil and gas industry applicants are responsible and accountable for ensuring that planning and development activities comply with the *Heritage Conservation Act (HCA)*. The AAP will address the oil and gas industry applicants' use of this system. The audit will assess oil and gas companies' performance and management systems and identify opportunities for improvement. The audit team will conduct both field and documentation reviews to:

- verify that oil and gas companies have appropriate management systems and controls to ensure that their operations comply with the requirements of legislation regarding archaeological resources;
- assess the degree of compliance with such legal requirements;
- measure oil and gas companies' management practices against relevant good management practices.

2.0 Audit Objectives

The primary objective of the annual AAP is to verify that oil and gas companies operating in BC employ appropriate controls to ensure that their operations comply with relevant legal and other regulatory requirements intended to protect and conserve archaeological resources. The audit will also evaluate whether systems are in place to ensure continued conformance with approved and accepted standards, statutes, regulations and practices.

These objectives are consistent with the OGC's performance-based strategy for overseeing oil and gas industry activity.

The information obtained from the audit is used to:

- determine if objectives can be achieved more effectively and efficiently;
- establish baseline data both for the auditee and the industry as a whole;
- and,

- identify innovative management practices.

Another objective of the AAP is to assess the degree of compliance with legislation, guidelines, conditions, and other requirements for OGC industry clients operating in BC. The AAP is not a compliance audit, and any observations regarding compliance are provided in the context of the weaknesses or failures of the management system that may have led to the compliance concern. However, the audit team will notify Commission enforcement staff of any breaches of legislation or policy as outlined in section 1.5 of the *Guidelines*.

The AAP will achieve its objectives by implementing two concurrent audit streams. The larger stream will consist of non-geophysical projects such as wellsites, pipelines and facilities, and the second stream will be comprised of geophysical projects. The two categories of project types have different application processes, which creates the need for separate audit streams. The difference in each project type's geographical footprint and its associated risk also create the need for separate streams.

3.0 Audit Procedures

This section outlines the methodology to be followed by the OGC and oil and gas companies for audits of management systems used by oil and gas companies as they relate to protection of heritage resources. Procedures common to both geophysical and non-geophysical projects are described in sections 3.1 to 3.4. Procedures that are specific to each audit stream are discussed separately in section 3.5.

The common audit procedures outline a timeframe for individual audit events, identify audit team roles and responsibilities, and define the general audit code of conduct. Audit stream specific procedures describe the process in which projects are selected for audit.

3.1 Audit Overview

The AAP Procedure Manual has been developed by the Commission's Regulatory Affairs and Stewardship Division, and the audit is conducted annually by the OGC's Heritage Conservation staff. A complete question set will be provided with the procedure manual as an appendix, allowing all companies to prepare for the possible audit.

The AAP Procedure Manual is revised annually and published on the Commission website as a reference tool. Sampling for the audit will occur following the procedures outlined in section 3.5 of the manual. Separate samples will be randomly selected for geophysical and non-geophysical projects.

The selected companies will be directly contacted in a letter describing their participation in the AAP. This letter will state the established time period for the audit and outline the stages of AAP process. The notification letter will include a documentation checklist, which outlines required documentation for the auditee to provide at the time of audit activities. There will be no grace period for documents to be submitted subsequent to the audit. Upon receipt of the audit notification letter, the company must contact the Audit Facilitator to set up audit appointments that coincide with the established audit period.

The AAP interviews and inspections will occur in northeastern BC during the allotted appointment time. The Commission audit team will meet with company representatives to conduct documentation and management system reviews. The team will review the provided documentation as described in section 3.2 and will then conduct its field component on the selected projects. The field component of the AAP includes the audit team obtaining audit evidence through interviews, additional documentation/record reviews, site inspections and observations. The projects subject to field audit will be selected at the discretion of the audit team during the audit process, either concurrently or after completion of the documentation and management system reviews. Companies will be contacted directly by the audit team to arrange for field audits. An interview with the field construction supervisor for the given audited development is a required component of the field audit. It is the responsibility of the oil and gas client to ensure that arrangements are made for the supervisor's attendance at the field audit.

Upon audit completion, the audit team prepares preliminary audit conclusions, backed by audit evidence. If requested by either the auditee or auditor, the information is presented at a closing meeting with appropriate staff from both parties present. The closing meeting provides an opportunity to discuss the accuracy of the audit evidence and issues related to the preliminary conclusions. The OGC audit team will record all its findings for analysis. This analysis will be used to produce audit reports. The Commission audit team will draft a formal written report to convey the final results of the examination

3.2 Audit Roles and Responsibilities

The AAP is a systematic process that relies on the principles of independence and objectivity. Specifically, the following principles guide the conduct of this audit and the presentation of audit results:

- Auditors shall act in an ethical manner and make decisions applying due professional care based on evidence obtained during the audit. Auditors will not act outside of their areas of competence and knowledge.

- Auditors will be impartial and independent of the activity that they are auditing, and act without bias or prejudice.
- Confidential information reviewed or obtained in the audit will be held in confidence by the auditors and only included in the audit report where the information is relevant to an audit finding.
- Audit results will be presented in a fair and accurate manner, and will truthfully reflect the audit activity and evidence.

The AAP will be executed by an Audit Facilitator and an audit team provided by Commission staff. The audit conclusions will be developed solely based on the audit evidence in a manner that should be reproducible by others based on the same audit evidence. Specific responsibilities for the respective parties are discussed below in Table 1.

Table 1: AAP Roles and Responsibilities

Role	Responsibilities
Audit Facilitator	<ul style="list-style-type: none"> • Arranging the logistics of the individual audit(s) within the annual AAP • Assigning areas of responsibility to audit team members, including the sections of the audit protocol or specific areas of inquiry that each team member will cover during the audit • Conducting the audit and overseeing the conduct of the audit team members during the audit • Coordinating the timely completion of the audit activities by the audit team members • Determining the results of the audit, based solely on the audit evidence obtained during the audit, including findings, recommendations, and other audit report requirements • Developing and submitting a draft audit report to the Commission Executive and other relevant parties, including the auditee, as appropriate • Discussing the draft audit report with relevant parties and determining the revisions, if any, to be made to the report • Preparing a final audit report summarizing audit results for submission to the Commission Executive. The Audit Facilitator takes ultimate responsibility for the content of the final Audit Report
	<ul style="list-style-type: none"> • Publishing final audit summary report on OGC website • Forwarding copy of the final company specific audit reports to the appropriate auditee

<p>Audit Team Members</p>	<ul style="list-style-type: none"> • Reviewing the sections of the audit protocols and other documentation or records relevant to their assignment(s) within the audit • Conducting the audit using the audit protocols or other working papers as required by the Audit Facilitator • Communicating concerns, problems, areas of interpretation, or other issues to the Audit Facilitator for resolution • Reporting evidence, potential findings, and other information to the Audit Facilitator in the format prescribed by the Audit Facilitator • Participating in reviews, discussions, further information gathering, and audit reporting as required by the Audit Facilitator
<p>Auditees</p>	<ul style="list-style-type: none"> • Cooperating with the OGC audit team, including providing all relevant information, documentation and records in a timely manner • Disclosing relevant information to the areas of audit inquiry in a full, truthful and accurate manner • Reviewing draft audit reports and providing additional information, comment or requests for clarification to the Audit Facilitator and /or Commission Heritage Conservation staff as appropriate • Development of an audit action plan for submission to the Commission where an audit action plan has been specifically requested

3.3 Determination of Audit Medium

The *Guidelines* identify actions and requirements that need to be undertaken by oil and gas industry applicants in order to ensure compliance with the *HCA*. The *Guidelines* do not specify a recommended management and control system to be used by the applicants in order to achieve compliance with the *HCA*.

The OGC Heritage Conservation staff will develop a list of preferred management practices that identify a recommended management approach and will serve as a basis for developing recommendations. The AAP, comprised of several modules, will act as a tool to identify and measure the gaps between the recommended approach and the approach used by the applicant companies. These modules are composed of specific questions for geophysical and non-geophysical projects. Details regarding module specifics are outlined in Table 2.

Table 2: Module Protocols

Module Type	Objective	Protocol
General Management System Questions	To ensure that applicants have adequate management and control systems.	Required to be answered once by applicant/operator during AAP
Archaeological Site Mitigation Questions	To ensure practices and procedures are established to properly address archaeological resources found.	Required to be answered once by applicant/operator during AAP
Project Specific Questions	To ensure required documentation exists on file.	Will be required for every project selected.
Field Specific/Field Related Questions	To ensure management and control systems are employed.	Selected during the audit process, either concurrently or after completion of the documentation and management system reviews.

General management system and archaeological site mitigation questions are only required to be answered once by each company selected for audit. These questions address the management and control systems employed by applicants/operators to determine if the systems are appropriately established to ensure compliance with the *HCA* and policies and procedures of the Commission. These questions address the management system only and do not investigate specific files.

Project specific questions, consisting largely of a documentation review, are reviewed separately for every project selected for audit. These questions will provide evidence to ensure that the general and archaeological site mitigation management systems are actually used in practice. Field specific questions will provide further evidence regarding the management and control systems employed.

3.4 Process and Methodology – Non-Geophysical Projects

The intent of the sampling methodology is to arrive at a random sampling of applicants with the probability of selection being directly proportional to the number of applications submitted by the company in the year prior to the audit .



Individual projects from each applicant will also be randomly selected for project-specific questions.

3.4.1 Population Sample Size and Desired Audit Level

During the 2008 calendar year, the OGC approved 2743 applications (including applications for revisions and amendments) for 2521 unique non-geophysical projects. These 2521 approved projects came from a total of 115 applicants. In order to get an accurate representation of the parent population, the non-geophysical stream of the AAP will use an audit level of 10% of applicants.

3.4.2 Sampling Technique

The sample population will be randomized. Samples will be drawn from the parent population until 10% of applicants have been chosen. For each applicant selected, a sample of 25% of that applicant's projects, up to a maximum of five projects, will be randomly selected from the parent population for the file specific component of the audit. For applicants that only have a single project in the parent population, that project will be selected.

Future audits may incorporate past audit selection and results into the selection process to focus audit resources on applicants that have not been previously audited and to exempt applicants that have had consistently excellent audit results within the previous years.

3.5 Process and Methodology – Geophysical Projects

As stated in section 3.4, the intent of the sampling methodology is to arrive at a random sampling of applicants with the probability of selection being related to the number of projects applied for that year. Individual projects from each applicant will also be randomly selected for project-specific questions.

3.5.1 Population Sample Size and Desired Audit Level

During the 2008 calendar year, the OGC approved 76 applications (including applications for revisions and amendments) for 70 unique geophysical projects. 3 geophysical projects are excluded from the parent population because they are located outside of northeastern British Columbia, resulting in a parent population of 67 approved projects from 30 applicants. In order to get an accurate representation of the parent population, the geophysical stream of the AAP will use an audit level of 20% of applicants.

3.5.2 Sampling Technique

The sample population will be randomized. Samples will be drawn from the parent population until 20% of applicants have been chosen. For each applicant selected, a sample of 50% of that applicant’s projects, up to a maximum of five projects, will be randomly selected from the parent population for the file specific component of the audit. For applicants that only have a single project in the parent population, that project will be selected.

Future audits may incorporate past audit selection and results into the selection process to focus audit resources on applicants that have not been previously audited and to exempt applicants that have had consistently excellent audit results within the previous years.

4.0 Audit Analysis

During each documentation and management system review, the Audit Facilitator will report relevant findings that will be judged against the categories established below in Table 3. Examples of practices are provided for each category. Upon completion, the tabulation of these findings will be used in the audit analysis.

Table 3: Findings Categorization

Finding Category	Description
Good Management Practice (GMP)	Process or practice is considered to be beyond the required process or practice: <ul style="list-style-type: none"> • e.g. An archaeological site is in conflict with a project and the archaeologist has flagged the site for avoidance. A company representative conducts a field visit immediately prior to construction and discusses avoidance with field manager. A field inspection is conducted after construction to ensure that crews have avoided impact to the archaeological site. • e.g. An archaeological impact assessment was required as a condition of approval, and was completed and submitted to the Commission, applicant database tracks status of this and all other archaeological assessments and logs communication with the OGC, archaeologist, and construction crew.
Satisfactory (S)	Practices are sufficient to deliver compliance with legal and other requirements:

	<ul style="list-style-type: none"> e.g. An archaeological site is in conflict with a project and the archaeologist has flagged the site for avoidance. The site is identified on revised project plans and the location is discussed by crews in a pre-construction meeting. e.g. An archaeological impact assessment was required as a condition of approval, and was completed, report submitted to OGC and documented in company files.
Opportunity for Improvement (OI)	<p>Describes an opportunity for improvement in management practices or potential weakness in the implementation of controls, such that the auditee may continue to improve their system and their performance:</p> <ul style="list-style-type: none"> e.g. An archaeological site is in conflict with a project and the archaeologist has flagged the site for avoidance. Avoidance is not discussed with construction crew and the field supervisor is expected to refer to the archaeological report for details. e.g. An archaeological impact assessment was required as a condition of approval, and was completed, but the report was not submitted to the OGC and/or is not documented in company files.
Non-Conformance (NC)	<p>Specific legal or other requirement is not met, or where the ability of the company to comply with legal or other requirements is jeopardized:</p> <ul style="list-style-type: none"> e.g. An archaeological site is in conflict with a project and was to be avoided by construction crews. There is a breakdown in communication and the construction crew was not aware of avoidance requirements. Consequently, the site is altered or destroyed. e.g. An archaeological impact assessment was required as a condition of approval, but no assessment was conducted prior to construction.
Not Applicable (N/A)	<p>Describes a situation in which the question is not answerable in this specific situation:</p> <ul style="list-style-type: none"> e.g. No archaeological sites are in conflict with the project.

The results generated by the management and documentation reviews will be analyzed and summarized for each company subject to audit. Each finding will be described in sufficient detail to convey a full understanding of the results and will be supported by reference to the relevant evidence reviewed during the audit.



Wherever possible, any findings not categorized as a GMP or S will identify the management practices, control or system weakness or failure resulting in a negative finding.

For all audit findings, the audit report will provide general recommendations for measures or actions that may be taken to address the findings. These recommendations will be provided as guidance only, and are not binding on the auditee. The implementation of new control systems that better represent the good management practices is at the discretion of the oil and gas industry applicant. Finally, the audit report will identify any practices noted during the audit that represent innovative or GMPs for which the auditee company should be commended, and from the knowledge of which other companies may benefit.

There will be no penalties imposed on companies that use management systems that do not meet GMP standards. However, audit reports will remain on file and may inform how any future non-compliance events are investigated.

The Audit Facilitator will develop the draft audit report within two weeks of completion of the onsite audit activity. The draft audit report will be submitted to the Audit Department, who will distribute it to the auditee and other relevant parties for review and comment.

Each audit report draft will include:

- Executive Summary
- Background
- Audit Objectives
- Audit Scope and Methodology
- GMP Determination Criteria
- Audit Findings
- Recommendations and Conclusions

5.0 Concluding Actions

The Commission will require all comments on the draft audit report be submitted by the auditees to the Audit Department within two weeks of distribution of the draft report. These comments will be forwarded to the Audit Facilitator, who will complete the final audit report within a further two week period. The Audit Facilitator will submit the final audit report to the Commission Executive for distribution. The Audit Facilitator and all other audit team members will also retain all audit working papers as records.

The Audit Facilitator will prepare a report summarizing the findings of the individual audit reports. This report will be published on the OGC website, along



with an information letter. Specific audit findings will be published, but the names of the companies subject to audit will not be included in the report. The publication will highlight good management practices identified during the audits and will help oil and gas clients to identify opportunities for improvement in their own archaeological management systems.

The Commission may require the auditee to develop and submit for approval audit action plans that address specific audit findings. Typically, this will occur when an audit finding has been made in regard to a potential issue of non-compliance with regulatory or legislative requirements. In these cases, the auditee will respond to the finding with a detailed description of the actions planned to ensure remediation of the issue described in the finding, to restore compliance where possible, and to prevent further instances of a similar nature. This description will include specific responsibilities and timelines for the completion of each task. The auditee will be responsible for tracking the completion of each task in accordance with the timelines provided, and to notify the OGC of any deviations from the tasks or the timelines.

Appendix A: Audit Questions

Please bring any supporting documentation that will help support answers to audit questions for both the field and the office portions of the audits, including archaeological reports, communication tracking records, training manuals, maps, emails, pre-construction packages, etc. There will be no grace period for submission of missing documents subsequent to the audit.

The field construction supervisor for a given development subject to audit should be the primary interviewee for the field portion of the audit.

Non-Geophysical Audit Questions:

Module 1: General Management System Questions

- Can the company representative define “100% previously disturbed area,” as outlined in section 2.0 of the *Guidelines*?
- When the client/agent makes a determination of 100% disturbance and there are no known archaeological sites within 500 metres of a proposed development, there is an option for the agent/client to complete sections 1 & 5 of the AAIF without consulting an archaeologist (refer to section 4.2 of the *Guidelines*).
 - a) Has a company representative ever determined that there is 100% disturbance and completed the AAIF without an archaeologist?
 - b) If the answer to (1) is yes,
 - o Does the company have access to the provincial archaeological site data?
 - o If yes, how often are these records updated?
 - o If no, how is it determined whether archaeological sites are in conflict?
 - o Who is responsible for this part of the process?
 - o What are the qualifications of the person making the determination of no archaeological work required?
- Does the company have a written procedure or checklist that verifies compliance with the requirements of the *Guidelines*?
 - a) If yes, what items are tracked? What tracking system is used? Who has access to the information?
 - b) If no, how does the company ensure that the guideline requirements are being followed? How is the information communicated amongst office and field?
- What archaeology related documents are kept on file? Where are they kept? How is the pertinent information shared?
- Is an AIA report received before instructions are given for construction to commence? Who receives and reviews the information prior to construction? What happens to the report?

- If no, the Well Authorization or Pipeline Permit states that an AIA has to be completed prior to construction. How does the company ensure that this permit condition has been met?
- Section 4.8 of the *Guidelines* requires that copies of the AIA reports must be submitted to the OGC.
 - a. Are report submissions to the OGC up to date?
 - b. How can this information be accessed?
 - c. How many reports are outstanding?
 - d. Who is responsible for ensuring report submission to the OGC?
- Many of the problems surrounding the completion of archaeological requirements are the result of poor communication between the agent/client and the archaeologist.
 - a. Does the company maintain a communication log with the agent/client and/or the archaeologist? How is the log maintained (e.g. what software used, what information is recorded)?
 - b. If no, can each stage of the assessment process be verified?
- What training is provided for staff and contractors with regards to compliance to relevant legislation, guidelines and company procedures? Is the training process formal and standardized?
- What is the process for communicating information about archaeological issues (sites to be avoided; regulatory requirements, etc) to field staff?

Module 2: Archaeological Site Mitigation Questions

- When an archaeological site is identified during an archaeological assessment, how is it documented in company files?
- Who is responsible for ensuring that mitigation strategies to avoid damaging an archaeological site are acceptable to the OGC, as per section 4.9.2 of the *Guidelines*?
- How is the approval of site mitigation strategies by the OGC, as described in section 4.9 of the *Guidelines*, documented in company files?
- When mitigation is required and has been approved by the OGC, what process is used to ensure the construction crew is informed and understands the mitigation strategy?
- Once construction has been completed, how does the company verify that mitigation strategies, such as site avoidance or special conditions for disturbance, were followed and that no other archaeological concerns were encountered?
- What is company procedure or policy in the case of accidental disturbance of archaeological resources, including burials? Is there a formal procedure in place? Who within the company would be assigned to investigate the incident? What is done with the results?
- How does the company ensure that the archaeologist is qualified, as required by section 4.5 of the *Guidelines*?
- Is a copy of the archaeologist's section 14 permit kept on file, and is the client certification page signed? Where is the permit kept? Who reviews it?
- For applications that include a review corridor:

- a. How is the area within the review corridor assessed by the archaeologist?
- b. If the entire corridor is not reviewed, how is the review corridor managed?

Module 3: Project Specific Questions

- Does the file contain records supporting the decision for noting “No Archaeological Potential” on the AAIF?
- Does the project file contain records supporting a determination of 100% disturbance, as per section 4.2 of the *Guidelines*?
- Does the company have an AAIF on file that matches the OGC copy?
- For files that require an Archaeological Impact Assessment (AIA):
 - a. Has the fieldwork been completed?
 - b. Has the report been received by the oil and gas company?
 - c. Was the field work component completed prior to construction?
 - d. When was the report received?
- If this project has an archaeological site located within the development area, the following records should be available at the time of audit:
 - a) Communication Documents
 - i. Mitigation discussion with the archaeologist
 - ii. Mitigation approval by OGC
 - iii. Communication to construction staff
 - iv. Communication from construction crew
 - b) Revised Survey Plans
 - c) Documentation verifying successful mitigation

Module 4: Field Visit/Field Related Questions

- If there is an archaeological site in or near the project, is archaeology discussed in a pre-construction meeting? Are records of the discussion kept? What training methods are used in the pre-construction meeting?
- Do you know whether this project required an on-the-ground archaeological assessment by your company’s archaeologists before construction? How do you know?
- If an arch assessment was required:
 - a. Do you know whether this assessment has been completed? How do you know?
 - b. Can you show us any documentation of this?
 - c. Were any sites found during the assessment of this project?
- If there is a review corridor, do the plans onsite show the latest revision of the review corridor, including areas that may have been excluded as having untested arch potential?

- If archaeological sites were found on this project or within the review corridor:
 - a) Do you know where they are?
 - b) Did the construction crew all know where they are? How were they informed?
 - c) How have they been marked?
 - d) Have the construction plans been changed to deal with the archaeological site? How have they been changed?
- If no archaeological sites were found on this project:
 - If a site had been found by an archaeologist during an assessment of this project, what is the process used by construction staff to review the information and carry out the approved mitigation strategy?
- What would happen if artifacts or human remains were found during construction?
- Do you know what the penalties are for damaging an archaeological site?
- During the course of the field investigation, can the auditor observe that:
 - a) All sites were flagged?
 - b) All mitigation measures in place?
 - c) Only those areas of the review corridor that were assessed were used in construction?
 - d) Areas that were not subject to archaeological assessment were not used in construction?
 - e) No cultural materials are visible in disturbed areas?
 - f) Field observations match information presented in applicable documentation, e.g. AAIF, archaeological reports?
 - g) Did field construction supervisor's understanding of field procedures correspond with office staff interview responses? (may be addressed after field interview is completed)

Geophysical Audit Questions:

Module 5: General Management System Questions

- Who is responsible for ensuring that archaeological requirements are met?
- How does the company ensure that archaeological requirements are met if the responsibility for planning and completing the geophysical program is assigned to consultants and/or contractors?
- How does the company determine whether or not archaeological sites in conflict with the program are flagged prior to construction?
- How does the company ensure that flagged sites are avoided?

- What is the process for communicating information about archaeological issues (sites to be avoided; raising the cat blade to avoid areas of archaeological potential; regulatory requirements, etc) to field staff?
- For programs that have a Selective Post Impact Assessment recommended in the AAIF:
 - a) Who determines whether or not ground disturbance has occurred and where a post assessment is required?
 - b) How is this determination made?
 - c) How long after construction completion does an archaeological assessment take place?
- How does the company track what work is outstanding on a given program?
- How does the company ensure that the post construction assessment is completed?
- What is the process for ensuring that the archaeology reports are submitted to the OGC?
- What training is provided for staff and contractors regarding compliance to relevant legislation, guidelines and company procedures? Is the training process formal and standardized?
- What is the process for communicating information about archaeological issues (sites to be avoided, buffer zones, etc) to field staff?
- Many of the problems surrounding the completion of archaeological requirements are the result of poor communication between the agent/client and the archaeologist.
 - a. Does the company maintain a communication log with the agent/client and/or the archaeologist?
 - b. If no, can each stage of the assessment process be verified? What process is used?

Module 6: Archaeological Site Mitigation Questions

- Once construction has been completed, how does the company verify that site avoidance or other special conditions for construction were followed?
- If an archaeological site is identified during the post impact archaeological assessment, how is it documented in company files?
- What is company procedure or policy in the case of accidental disturbance of archaeological resources, including burials? Is it a formalized procedure?
- How does the company ensure that the archaeologist is qualified, as required by section 4.5 of the *Guidelines*?
- Is a copy of the archaeologist's section 14 permit kept on file, and is the client certification page signed? Where is the permit kept? Who reviews it?
- If a site flagged for avoidance is damaged during the construction of a program, the company that was issued the approval would be responsible for the destruction. Who within the company would be assigned to investigate the incident? Is there a formal process in place for incident investigations? What is done with the results?

Module 7: Project Specific Questions

- Does the company have an AAIF on file that matches the OGC copy?

- If the approval conditions state that flagging is required for this program, is there a letter from the archaeologist confirming that the known archaeological site(s) in this program is (are) flagged prior to construction in the company file?
- If the approval conditions state that Selective Post Impact Assessment is required, does the company file contain evidence that the assessment is complete?
- If the Selective Post Impact Assessment is complete, has it been submitted to the OGC?
- If the project was associated with known archaeological sites, do the construction plans contain accurate information about the location of the archaeological sites?
- If the project was associated with known archaeological sites, how did the company ensure that these sites were successfully avoided?

Module 8: Field Visit/Field Related Questions

- Is archaeology discussed in a pre-construction meeting? Are records of the discussion kept? What training methods are used in the pre-construction meeting?
- Do you know whether there are any archaeological sites in the program area?
 - How do you/would you know?
- Have all archaeology sites in the project area been located and flagged?
 - How do you know?
- Who would you talk to if you had any concerns about archaeology?
- Do you know what the penalties are for damaging an archaeological site?
- The need for further archaeological work sometimes depends on the level of disturbance. Are the locations of disturbed areas recorded and then communicated to someone once construction is finished?
 - Who is informed, and how?
- During the course of the field investigation, can the auditor observe that:
 - a) All sites were flagged?
 - b) All mitigation measures in place?
 - c) No cultural materials are visible in disturbed areas?
 - d) Field observations match information presented in applicable documentation, e.g. AAIF, archaeological reports?
 - e) Did field construction supervisor's understanding of field procedures correspond with office staff interview responses? (may be addressed after field interview is completed)