

FY-2004 Oklahoma Quality Assurance Policy

State Level Quality Assurance

State level reviews will be completed annually following the guidelines outlined in GM 340 Part 404, Amend OK1, June 2000. One zone will be reviewed each year. The review will be conducted by members of the State Leadership Team and two individuals representing the teams.

Field Level Quality Assurance

The method for assuring quality of work being provided to NRCS customers will focus on the following:

- Conservation Practice Reviews
- Conservation Plan Reviews
- Programmatic Reviews

Conservation Practice Reviews

For the purposes of this policy, “certification” and “certifying a practice” means signing appropriate documentation that the practice supporting documentation has been reviewed by NRCS and meets all applicable NRCS standards and specifications, in accordance with General Manual 450, Part 407, Subpart B.

1) Practices considered for review

- a) Practices for which NRCS has certified as to meeting NRCS standards and specifications. (Includes both cost-shared and non cost-shared practices).
- b) Practices included in contracts that are non cost-share installations. These practices must be certified by NRCS, regardless of whether or not NRCS provided technical assistance in the installation; and therefore are subject to potential review.
- c) All practices certified on farms owned or operated by NRCS employees or their immediate families must be reviewed.

2) Practice reviewers

- a) Practice reviews must be completed by a TSO specialist or a person with equal or higher approval authority than the individual certifying the practice reviewed.
- b) Teams may nominate persons from their team to complete practice reviews. Nominations must be made to the ASTC (FO) before October 15 of each fiscal year.
- c) The ASTC (FO), jointly with the TSO specialists, will determine approved practice reviewers for their zone. The approved list of practice reviewers will be submitted to the BOT by the ASTC (FO) before November 15 of each fiscal year, if there are changes from the previous year.

3) Time frames for reviews

- a) Practice reviews are to be done on practices that are certified as to meeting NRCS standards and specifications during the fiscal year.
- b) Practice reviews should be completed as soon as possible following practice certification. Required practice reviews must be completed by January 1 for practices certified the previous fiscal year.

- c) District Conservationists are responsible for requesting the scheduling of practice reviews and allowing adequate time for reviews so that the reviews may be completed within the designated time frame.

4) Number of Practice Reviews

- a) Practice reviews will be completed on a minimum of 5 percent of each practice code certified each fiscal year, per field office.
- b) If there are 30 or more installations for a practice code, then it is not necessary to review more than two installations of that practice code.
- c) If there are 10 or fewer installations for a practice code, then that practice code will only have to be reviewed if it has not been reviewed during the previous two years.
- d) Practice reviewers will use discretion to decide if additional practice reviews are necessary.

5) Review Procedures

- a) For ecological sciences practices, form OK-CPA-5 shall be used. Copies of each OK-CPA-5 will be provided by the reviewer to the District Conservationist, with carbon copies to ASTC (FO), and the State Resource Conservationist by a formal transmittal letter.

Pending practice reviews will be denoted on the OK-CPA-5. The State Resource Conservationist will maintain a spreadsheet of all pending practice reviews, by fiscal year

- b) For engineering practices, form OK-ENG-23 shall be used. Distribution of the OK-ENG-23 will be as follows:
 - i) For pending practice reviews - a copy of the OK-ENG-23 will be provided to the District Conservationist, ASTC (FO), and the State Conservation Engineer.
 - ii) For non-pending practice reviews - the OK-ENG-23 will be provided to the District Conservationist, with no additional copies needing to be sent.
- c) For those practices requiring computations as a basis for cost-sharing under cost-share programs, the practice reviewer will use the same procedures in determining quantity that was used by the person certifying quantity. However, if the reviewer determines that the method for measuring the practice extent does not have sufficient accuracy; other methods may be used for verification.

6) Handling Errors

- a) When the practice does not meet standards or specifications:
 - i) For cost-shared practices - The District Conservationist will notify the landowner in writing immediately, with a copy to the ASTC (FO). If the landowner fails to bring the practice up to NRCS standards within a year of notification, then the District Conservationist, with a copy to the ASTC (FO), will report the facts to the cost-share agency.
 - ii) For non-cost shared practices – The District Conservationist will notify the landowner in writing, with a copy to the ASTC (FO), informing them of review findings and offering NRCS technical assistance to bring the practice up to NRCS standards. No additional action is necessary.

- b) Where there are errors in computations – Errors are the difference in the certified amount and the actual amount. Errors will be identified and handled in one of the following ways:
 - i) Significant Errors – are errors that result in a total cost difference of \$250 or 10% of the total cost, whichever is less. For significant errors, the District Conservationist will notify the appropriate cost-share agency and the landowner in writing of the correct quantity. A copy of this letter will be provided to the ASTC (FO) and the practice reviewer.
 - ii) Insignificant Errors – are errors that result in a total cost difference of more than \$50, but are not significant errors. These errors are reported to the District Conservationist as possible training needs, but no additional action is necessary.
 - iii) Non-reportable Errors - Errors resulting in total cost difference of less than \$50 do not have to be reported, regardless of the total cost of the practice.

7) Required Reports

- a) Each field office will maintain a fiscal year listing of practices certified in the field office. This listing will record at a minimum, the Practice Code, Landowner's Name, Cost-Share Program. Additional items may also be included on the listing at the option of the field office. SCS-MGT-199 is one form that is available that could be used for this listing. This listing will be made available to practice reviewers upon request.
- b) The District Conservationist will submit an intermediate OK-MGT-WKSHT-1 to the zone practice reviewers and the ASTC (FO) on March 31, June 30, and September 30.
- c) By January 1 of each year, each District Conservationist will submit the final OK-MGT-WKSHT-1 for the previous year to the ASTC (FO) and zone practice reviewers. The District Conservationist's signature will certify completion of all required practice reviews for the previous fiscal year. If the necessary number of reviews has not been completed, then the back side of OK-MGT-WKSHT-1 will be used to explain the reason(s) practice reviews have not been completed in the required time frame, and document a plan for completing the practice reviews. ASTC(FO) will provide a copy of all final OK-MGT-WKSHT-1's from offices in their zones to the BOT.
- d) District Conservationists will notify the practice reviewer when items identified as pending have been completed and to request their concurrence in removing the review out of pending status. If the practice reviewer determines that actions completed are adequate to remove the practice from pending, then the practice reviewer will notify the District Conservationist, ASTC (FO), and the appropriate member of the BOT.
- e) Technical Specialists will maintain a list of pending practice reviews in their service area. They will work informally with Field Offices to clear up pending items prior to the first 90 day reporting time frame.
- f) District Conservationists are required to report the status of pending practice reviews each 90 days to the ASTC (FO) and the zone practice reviewers until the item has been removed from pending status by the practice reviewer.

8) Quality control of practice reviews

- a) Each individual performing practice reviews will have at least two reviews that they have completed reviewed for quality control. The BOT or their designee will complete quality control reviews.
- b) Ecological Sciences practice reviewers will submit a report of findings to the State Resource Conservationist by January 1.
- c) Engineering practice reviewers will submit an intermediate report on OK-ENG-37 to the State Conservation Engineer by July 31, and a final OK-ENG-37 by January 15.
- d) The State Conservation Engineer and State Resource Conservationist will submit a summary report for quality control of practice reviews to the State Conservationist by January 31 of each year.

Conservation Plan Reviews

- Conservation Plan Reviews must be completed by January 1 for plans written the previous fiscal year.
- Either the Resource Specialist or Level 3 Planner from the team will review the conservation plan for quality assurance. The Resource Soil Scientist will schedule and be a part of the review process and provide input, training, and guidance.
- The reviewer will select a minimum of two conservation plans per employee with Level 2 conservation planning certification for review.
- Exhibit 1 of 180-GM, Part 409, will be used to document the conservation plan review for conservation planning certification and quality assurance.
- All conservation plan reviews will be sent to the employee, their supervisor, the ASTC (FO), and the SRC with findings and/or recommendations.
- A quality control review will be completed on all Resource Specialists and Level 3 planners completing conservation plan reviews. This quality control review will consist of a minimum of one plan being randomly selected from plans reviewed and certified by the reviewer. The quality control reviews will be completed by the SRC or their designee.

Programmatic Quality Reviews

1) Considerations for Program Quality Reviews

- a) Program contract reviews will be conducted annually at each field office. Each program must be reviewed a minimum of once every three years. The representative sample selected for these reviews must include a representation of all programs implemented within the team. A minimum of one (1) contract will be reviewed per program with additional reviews conducted as determined necessary by the reviewer. Contracts reviewed will include a mixture of new contracts and contracts in varying stages of implementation.
- b) Results of each FO programmatic review will be shared with all field offices within the team and each office will be responsible for using that information to correct known deficiencies. ASTC(FO)'s will follow up with all offices to insure that action items are being addressed in other offices where that program exists but was not reviewed that year.
- c) First time implementation of programs for NRCS or a given office will require review of that program activity in the office(s) in the first year of implementation. The above multi-year rotation would not be applicable until an acceptable level of quality for the program has been established for the office in servicing the program.
- d) All programs for which NRCS has accepted any degree of technical or programmatic responsibility will be incorporated into the entirety of the review process. This includes, but is not limited to Partners for Wildlife, State Cost-share Program, and 319 Water Quality Demonstration Projects.
- e) All contracts held by NRCS employees or immediate family members (spouse, children, mother, father, siblings, and/or grandparents) will be reviewed each year in addition to the other contracts selected for review.
- f) The primary focus of the program quality reviews will be conformance with program policy, procedure, and processes. Summary reports for these reviews will indicate the program(s) that were reviewed and findings encountered.

2) Program Reviewers

- a) Teams, with the concurrence of the ASTC (FO), will select a minimum of two (2) individuals to conduct program reviews from its member field offices. The approved list of team program reviewers will be forwarded to the ASTC (Programs) no later than November 15 annually, if there are changes from the previous year.
- b) Teams may nominate other individuals to replace program reviewers but should maintain at least one individual with program review team experience.
- c) Program liaisons will be responsible for coordinating and assisting with program quality reviews within their respective Zone.
- d) The ASTC (Programs) and the Programs staff will be responsible for training selected reviewers and liaisons regarding program review requirements.

3) Timing of Program Quality Reviews

- a) Program reviews should be conducted as soon as possible after application review period(s) and selection of applications for contract development. Program reviews must be completed by no later than January 1 annually.

- b) District Conservationists are responsible for requesting the scheduling of program reviews in consideration of deadlines, workload, and schedules.

4) Program Quality Review Procedures

- a) Field offices will provide the program reviewers a list of active programs, including information regarding the implementation of new programs and the year a program was last reviewed, using the Field Office Program Activity Report (form OK-SPA-441). Program reviewers will use this list to schedule appropriate reviews within the team.
 - i) Team program reviewers will coordinate the program review schedule between themselves and the field offices.
 - ii) All programs that are active within the team will be reviewed annually.
 - iii) Program reviewers will rotate field office program review schedules to avoid an individual reviewer conducting reviews in any field office in consecutive years.
- b) Program reviewers will utilize the most current check sheet for each contract/program reviewed. Reviewers will forward the original copy of the check sheet to the ASTC (Programs), a copy to the field office, and keep a copy for their record.
- c) Program reviewers will document reviews completed on the Summary of Program Quality Reviews (form OK-SPA-442) by field office and program. Reviewers will forward the original copy of the summary, with appropriate check sheet, to the ASTC (Programs), a copy to the field office, and keep a copy for their record.

5) Handling Errors

- a) Technical errors
 - i) Apparent technical errors identified during the program review process will be documented on the appropriate check sheet by including the words "Technical Review Recommended" at the top of the check sheet and forwarded to the appropriate zone technical staff [with a copy to the appropriate ASTC(FO) and ASTC(Programs)] for resolution.
- b) Errors in payment computations
 - i) When detected during a program review, policy for dealing with payment computation errors relative to significant, insignificant, and non-reportable items will be consistent with the practice review instructions (Conservation Practice Reviews, Item 6b, i, ii, and iii).

6) Required Program Quality Review Reports

- a) The District Conservationist will submit an OK-MGT-WKSHT-1 regarding field office program review activities to the ASTC(FO) at the end of each quarter with a final report consistent with the practice quality review instructions (Conservation Practice Reviews, Item 7c).
- b) District Conservationists will notify the program reviewer when items identified as pending have been completed and to request their concurrence in removing the review out of pending status. If the program reviewer determines that actions completed are adequate to remove the practice from pending, then the program reviewer will provide a written response to the District Conservationist, ASTC (FO), and the ASTC (Programs).

- e) District Conservationists are required to report the status of pending program review items each 90 days to the ASTC (FO) and the zone program reviewers until the item has been removed from pending status by the program reviewer.
- f) The ASTC (Programs), or designee, will maintain a complete record of annual program review activities and inform the ASTC (FO)'s at least quarterly of the number and status of reviews conducted by team.

7) Quality Assurance of Program Quality Reviews

- a) The ASTC (Programs), or designee, will review program review activities in each administrative team by January 1 annually. At a minimum, the review activities of each program reviewer will be conducted at at least one (1) field office where that individual performed program quality reviews that year.
- b) The ASTC (Programs) will submit a summary report for quality assurance of program reviews to the State Conservationist by January 31 annually.