

USDA Natural Resources Conservation Service

**Pacific Islands Area
Quality Assurance Plan
Fiscal Year 2013**



Final FY13

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Pacific Islands Area Quality Assurance Plan Fiscal Year 2013

INTRODUCTION

Quality Assurance is the process used to ensure that conservation planning, application, and program implementation activities comply with Agency policy, procedures, and program guidelines.

This Quality Assurance Plan identifies and addresses the quality assurance processes, quality control issues, and producer compliance activities for the NRCS in the Pacific Islands Area (PIA) during fiscal year 2013.

The Pacific Islands Area includes two areas, East and West. The East Area includes the State of Hawaii, Territory of American Samoa, and the U.S. Minor Outlying Islands. The West Area includes the Territory of Guam, Commonwealth of the Northern Mariana Islands, Federated States of Micronesia, Republic of Palau, and the Republic of the Marshall Islands.

I. STATE QUALITY ASSURANCE PLAN

A. PIA Quality Assurance Plan

This document is the fiscal year 2013 “State” Quality Assurance Plan for the Pacific Islands Area (PIA).

The Director will direct and lead the development of the annual PIA Quality Assurance Plan for the upcoming fiscal year with the assistance of members of the PIA Leadership Team. Leadership Team will implement the PIA Quality Assurance Plan activities as outlined in this Plan. The Director will include the development of the PIA Quality Assurance Plan as an action item in the annual PIA Business Plan.

The PIA Leadership Team includes: Director; Assistant Director (AD) for Operations; Assistant Directors for Field Operations East and West (ADFOS); Assistant Director (AD) for Technology; State Conservation Engineer (SCE); Assistant Director (AD) for Programs; Assistant Director (AD) for Soil Science and Natural Resource Assessments; Assistant Director (AD) for Administration; Public Affairs Specialist; and others as designated by the Director.

B. PIA Quality Assurance Report

The AD for Operations is responsible for preparing the previous fiscal year (FY-2012) PIA Quality Assurance Report for the Director with the assistance of members of the PIA Leadership Team. The Quality Assurance Report will be prepared in accordance with the instructions that are sent out by the NRCS National Office, usually via a National bulletin.

II. OFFICE QUALITY REVIEWS

A **state quality review of an office** is an in-depth review of all aspects of the operational, managerial, technical, programmatic, and partnership activities in a field office or other organizational unit below the State office such as an Area office or MLRA Soil Survey office.

In the PIA, office reviews should be viewed as an opportunity to share information and to understand how office activities are being managed and as a learning process for all participants. Office reviews are to be performed with a helpful and positive attitude which will produce benefits for all.

A. PIA Offices Subject to Quality Reviews

The following offices are subject to quality reviews in the Pacific Islands Area:

1. Area Offices (East and West)
2. Field Offices
3. MLRA Soil Survey Office

1. Area Offices

The two area offices are supervised by the area's Assistant Director for Field Operations. The Assistant Directors for Field Operations are supervised by the PIA Director.

2. Field Offices (Service Centers)

There are twelve field offices (service centers) located in the PIA. The field offices are supervised by a District Conservationist or a Resource Conservationist who in turn are supervised by the area's AD for Field Operations. The twelve offices are as follows:

The East Area:

1. Aiea Service Center, Hawaii
2. Hilo Service Center, Hawaii
3. Hoolehua Field Office, Hawaii
4. Kahului Service Center, Hawaii
5. Kealahou Service Center, Hawaii
6. Lihue Service Center, Hawaii
7. Waimea Field Office, Hawaii
8. American Samoa Service Center, Territory of American Samoa

The West Area:

1. Guam Service Center, Territory of Guam
2. Palau Field Office, Republic of Palau
3. Pohnpei Field Office, Federated States of Micronesia
4. Saipan Field Office, Commonwealth of the Northern Mariana Islands

3. MLRA Soil Survey Office

There is one MLRA soil survey office in the PIA, as follows:

1. PIA Soil Survey Office, Kealahou, Hawaii

The PIA MLRA Soil Survey Office is supervised by the AD for Soil Science and Natural Resource Assessments.

Soil survey office reviews in the PIA will be conducted such that they are complimentary to and minimize overlap with annual soil survey project reviews that are conducted by MLRA-02 staff in cooperation with the AD for Soil Science and Natural Resource Assessments.

B. PIA Office Quality Reviews

Following is information about how office quality reviews will be conducted in the PIA.

1. Amount to be Reviewed and Schedule

Each NRCS office will be reviewed at least every five years or sooner depending on past quality reviews and tenure of the office supervisor. See Table 1 - Annual Schedule of PIA Office Quality Reviews. The responsible PIA Leadership Team member will develop an appropriate review agenda.

2. Quality Review Team

See Table 2 – Office Review Teams, for a listing of the team leader’s and potential team members for each type of office review.

3. Participants

All NRCS staff in the office will be involved in the quality review.

The service center will include opportunities for the Office Quality Review Team to meet with conservation partners such as Soil and Water Conservation District Board members and staff; clients; and others to discuss our service and programs. The Office Quality Review Team will be responsible for selecting partners, clients, and others.

4. Scheduling

The Office Quality Review Team leader is responsible for scheduling the quality review with the office supervisor. The office supervisor will assist with scheduling the quality review with his/her office staff and interviews and visits with the selected conservation partners, clients, and others.

5. Procedures

a. Entrance Briefing

The purpose, policy, and the procedures of the office quality review will be discussed. The entrance briefing participants will include the Office Quality Review Team and office staff. Conservation partner members and staff may also be invited to participate.

b. Review Guides

The following office quality review guides will be used to conduct quality reviews of each type of office:

| Office | Review Guide to be Used |
|---------------------------------|--|
| Area Offices | Field and Area Office Quality Review Guide |
| Field Offices (Service Centers) | Field and Area Office Quality Review Guide |
| MLRA Soil Survey Office | MLRA Soil Survey Office Quality Review Guide |

In addition, a civil rights compliance review will be conducted in conjunction with every office quality review (also see Section VI, page 10). The “Pacific Islands Area **Civil Rights Compliance Review Guide**” will be used to conduct the review.

c. Exit Briefing

An exit briefing will be held to review the Office Quality Review Team's findings, commendations, and recommendations for corrective actions. The exit briefing participants will include the Office Quality Review Team and area office staff. Conservation partner members and staff may also be invited to participate.

6. Followup

The office supervisor and his/her supervisor will prepare and agree to a plan for corrective action. The plan will include a schedule for completing corrective actions and submitting periodic reports.

The Office Quality Review Team leader will send a report of the office quality review to the Director. The report shall be coded 330-11, Management Quality Reviews and filed in the PIA State Office.

7. Office Documentation and Filing

The office supervisor will maintain the necessary documentation of quality control and quality assurance activities on all products under heading 330-11, Management Quality Reviews.

**Table 1 - Annual Schedule of PIA Office Quality Reviews
Fiscal Year 2008 through Fiscal Year 2017**

| Date | Pacific Islands East Area | Pacific Islands West Area |
|-------------|---|--|
| FY-2008 | Kahului Service Center Tri-Isle RC&D Office | Guam Service Center Pohnpei Field Office |
| FY-2009 | Hoolehua Field Office Hilo Service Center American Samoa Service Center Big Island RC&D Office American Samoa RC&D Office | Palau Field Office |
| FY-2010 | Kealahou Service Center Aiea Service Center Oahu RC&D Office | Marianas RC&D Office West Area Office |
| FY-2011 | Lihue Service Center Garden Island RC&D Office | Saipan Field Office |
| FY-2012 | Waimea Field Office Hilo Service Center | Guam Service Center |
| FY-2013 | Hoolehua Field Office Kahului Service Center | Pohnpei Field Office |
| FY-2014 | East Area Office American Samoa Service Center | Palau Field Office |
| FY-2015 | Kealahou Service Center PIA MLRA Soil Survey Office | West Area Office |
| FY-2016 | Lihue Service Center Aiea Service Center | Saipan Field Office |
| FY-2017 | Waimea Field Office Hilo Service Center | Guam Service Center |

Table 2 – Office Review Teams

| Offices | Team Leader | Potential Team Members |
|------------------------------------|--|---|
| Area Offices | AD for Operations | AD for Administration; AD for Programs; AD for Soil Science & Natural Resource Assessments; AD for Technology; State Conservation Engineer; Public Affairs Specialist |
| Field Offices (Service Centers) | AD for Field Operations | Area Resource Conservationist; Area Resource Conservationist (Programs); AD for Administration; AD for Operations; AD for Programs; AD for Soil Science & Natural Resource Assessment; AD for Technology; Area Conservation Engineer or State Conservation Engineer |
| MLRA Soil Survey Office | AD for Soil Science & Natural Resource Assessments | AD for Administration; AD for Operations |

III. SPOT CHECKS OF COMPLETED CONSERVATION PRACTICES

A spot check is a review of a completed conservation practice that is used to evaluate the quality of conservation practices.

A. Policy

Spot checks will be conducted in accordance with both the PIA spot checking policy included in the [July 2009 PIA State Supplement](#) to the General Manual, Title 450, Part 407 – Documentation, Certification and Spot Checking and on the guidance in the latest amended national spot checking policy ([General Manual, Title 450, Part 407](#), October 2009). The PIA spot checking policy will be updated to reflect the amended national policy.

The PIA spot checking policy states that the ADFOs and DCs will ensure the needed spot checks and corrective and followup actions are completed for the current fiscal year for each field office and for Technical Service Providers.

The selection of practice to be spot checked will be based on new guidance in the national spot checking policy.

B. PIA Field Office and Technical Service Provider Spot Checks

1. Field Offices:
 - i. Spot checking should be conducted in each office at least every third year.
 - ii. Spot checks of completed conservation practices or practice components shall be completed by NRCS employees.
 - iii. Spot check five (5) percent of the total practices installed or reported in the PIA. If a practice exceeds 400 occurrences, only 20 installations of that practice need to be checked. It should not be necessary to check more than three to five low risk practice installations in an office.
 - iv. Calculations will be rounded up to the next highest whole number.
 - v. Spot checks should be distributed among various practices applied during the year, and each type of practice should be spot checked at least every three (3) years. If errors or deficiencies are found, additional installations will be checked until a true picture of the quantity and quality of the work is obtained. All cost-shared practices for which NRCS is technically responsible on farms that NRCS employees own, or have an interest in, are to be spot checked. These checks, as well as those checks made during State Quality Reviews, are counted as part of the spot-check requirements. If an individual conservation practice exceeds 100 in a given fiscal year, only 5 are required to have a spot check.
 - vi. In choosing which practices to spot check, priority should be given to the spot checking of conservation practices that pose a greater risk to: life, property, and the environment; practices where a high percentage of annual cost-share funds were used; and practices with a high installation cost compared to other practices. The PIA Director shall develop a procedure to set priorities for conservation practices to be spot checked. High-risk practices may be spot checked at a higher rate than low-risk practices.
 - vii. The person performing the spot checking should select random samples of the technical work of as many members of the staff as practical. The work of each staff member should be spot checked a minimum of once every 3 years.

2. Technical Service Providers (TSPs): Spot Checks of Completed Conservation Practices or Practice Components Completed by TSPs:
 - (1) For the first 3 years after certification (excluding renewals) or recertification of the TSP, a spot check will be performed for at least 10 percent of the conservation practice and practice components. For a TSP where the number of installations of a conservation practice or practice component exceeds 50 in a given year, only 5 are required to have a spot check.
 - (2) After the first 3 years of certification or recertification of the TSP, a spot check will be performed on at least 5 percent of the conservation practice or practice components. For a TSP where the number of installations of a particular type of conservation practice or practice components exceeds 100 in a given year, only 5 are required to have a spot check.
 - (3) The PIA Director will ensure that the sample of an individual TSP's work is a representative cross section by geographic area, size of projects, and complexity of projects.
 - (4) The person performing the spot check may expand the sample as necessary to determine the scope of any problems or deficiencies. The expanded sample may be extended to include installations completed in previous years.
 - (5) If in the course of conducting a spot check where waste, fraud, or abuse is suspected, the spot check for that practice will be suspended immediately and the incident reported.

The table on the following page outlines the spot checking timeline and major responsibilities.

Part PI407.30 Spot Checking Timeline and Major Responsibilities

| Date | Major Responsibilities | Responsible Staff |
|----------------------------|--|--|
| By Nov. 31, 2012 | Develop lists of the kind and number of practices installed during the previous fiscal year for each field office in their Area (East or West). | ADFOS (Assistant Directors for Field Operations) |
| By Dec. 15, 2012 | Select practices to be spot checked during the current fiscal year for each field office in their Area. Enter the selected practices in the Spot Checking Tracking Worksheets. Provide copies to DCs, ADT, SCE, and ADO. | ADFOS |
| Ongoing from Dec. 15, 2012 | Schedule spot checks with the field offices. Coordinate needed spot checks with spot checkers and their supervisors, and the affected NRCS employees, partner employees, and clients. Spot checks should be scheduled on a continuing basis throughout the fiscal year in conjunction with regular field office visits or as a part of Field Office Quality Reviews, to the extent possible. | Spot Checkers and DCs (District Conservationists) |
| By Aug. 31, 2013 | Ensure spot checks of ecological and engineering practices are conducted as scheduled for all field offices in the entire PIA. Request State Office assistance, if needed. | ADFOS |
| Ongoing till Aug. 31, 2013 | Conduct spot checks, as scheduled and assigned. Complete spot check reports and provide copy to DC, ADFO, and ADT or SCE. | Spot Checkers |
| Ongoing till Aug. 31, 2013 | Track results of spot check reports in the Spot Checking Tracking Worksheets for all field offices in their Area. Worksheets will be updated on a quarterly basis, at a minimum. | ADFOS |
| By Aug. 31, 2013 | Ensure spot checks are completed for all field offices in their Area. | ADFOS |
| by Oct. 31, 2013 | Prepare an end of fiscal year spot checking status report for all field offices in their Area. Provide copy to DCs, AD for Operations, ADT, SCE, and Director. | ADFOS |
| By Nov. 30, 2013 | Ensure Plans for Corrective Actions are prepared as needed for all field offices in their Area. Work with DC and other appropriate parties (planner, TSP, spot checker, ADT, and/or SCE) to develop plans. | ADFOS |
| Ongoing till Nov. 30, 2013 | Track the preparation of Plans for Corrective Action for their Area in the Spot Checking Tracking Worksheets. Worksheets will be updated on a quarterly basis, at a minimum. | ADFOS |
| By Jan. 31, 2014 | Ensure that all agreed-to corrective action items (included in the Plans) are completed for their own office. After all items have been completed in a Plan, send copy of Plan to ADFO. | DCs |
| By Jan. 31, 2014 | Ensure that all agreed-to corrective action items are completed for all field offices in their Area. | ADFOS |

IV. HELC/WC COMPLIANCE REVIEWS

Customer conformance is the process used to assess performance of clients in meeting requirements of the conservation program. Customer conformance is determined using compliance and contract reviews.

NRCS policy regarding compliance and contract reviews is included in the [General Manual, Title 340, Part 404, Subpart D – Customer Conformance](#). The policy was revised and released on October 2009.

A. Purpose

Compliance Reviews give USDA and USDA program participants a basis for determining if—

- (1) The conservation management system being used meets the substantial soil loss reduction/no-substantial increase definitions as set forth in the National Food Security Act Manual, Part 512, Subpart A, Conservation Systems, Section 512.03.
- (2) Wetland Conservation and HELC provisions are being met.

Compliance Reviews provide documentation about how well the participant is complying with the provisions, and offer a means of identifying any systemic implementation or compliance problems.

Compliance Reviews are conducted on a national sample of tracts. Additional tracts may be added at the State level when necessary. Each Compliance Review is a technical review on an entire tract.

The current edition of Title 180, National Food Security Act Manual (NFSAM), Parts 510 to 520 requires NRCS to implement and carry out quality assurance reviews that ensure that Highly Erodible Land Conservation and Wetland Conservation Compliance (HELC/WC) procedures are implemented efficiently, uniformly and consistently throughout the National (180-NFSAM, Part 519, Subpart A, Section 519.1). Part of the process requires States to sample previously conducted annual HELC/WC status reviews in order to determine the accuracy of the original determination, the consistency with other determinations within the same landform or land use areas and conformance to policy.

B. Policy

Per GM. 340.404.D:

- (1) Tracts will be selected randomly. The number of tracts selected will be sufficient to accurately assess national rates of compliance with the HELC and Wetland Conservation provisions of the Food Security Act of 1985, as amended.
- (2) By December 31 of each year, the STCs and Directors, Pacific Islands and Caribbean Areas, will receive the national sample tract lists.
- (3) Tracts must be added by the STC or Directors, Pacific Islands and Caribbean Areas, to the tract list and a compliance review conducted where a variance or exemption for the tract was approved the previous fiscal year.
- (4) Supplemental tracts for compliance reviews may be added by the STC or Directors, Pacific Islands and Caribbean Areas.
- (5) The Farm Security and Rural Investment Act of 2002, May 13, 2002 (the 2002 Farm Bill), Public Law 107-171, Section 1211(b) and Section 1221(e), states that only NRCS employees are authorized to determine if a USDA participant is in compliance with the HELC and Wetland Conservation provisions.
- (6) Additional information on compliance reviews is contained in Title 180, National Food Security Act Manual, Part 518, Compliance Reviews.

C. Roles and Responsibilities

State Conservationists and Directors, Pacific Islands and Caribbean Areas, are responsible for:

- (1) Assigning staff to conduct compliance reviews within each State.
- (2) Ensuring that actions taken pertaining to requests for compliance review variances are executed and completed within the specified timeframes.
- (3) Ensuring that corrective action is taken to address deficiencies found in compliance reviews.
- (4) Determining if additional compliance reviews are required.

The AD for Technology is responsible for carrying out the Director's responsibilities for conducting compliance reviews in the PIA.

V. PROGRAM CONTRACT AND EASEMENT REVIEWS

Contract reviews are a part of customer conformance which is the process NRCS uses to assess performance of clients in meeting requirements of conservation programs. .

A. Purpose

Contract Reviews are conducted to—

- (1) Ensure that program participants meet the terms and conditions included in conservation contracts and easements.
- (2) Monitor operation and maintenance of installed conservation practices and systems.
- (3) Determine if applied conservation practices and systems meet the resource needs.
- (4) Monitor management needs for achieving goals on easement sites.
- (5) Document any need for contract modifications, revisions, or administrative actions.
- (6) Determine if applied conservation practices meet standards and specifications contained in the Field Office Technical Guide.

B. Policy

Per GM. 340.404.D:

- (1) Refer to the [Conservation Programs Manual \(440-CPM\), Title 440, Part 512, Subpart F, Contract Administration, Section 512.55](#), for policy on contract reviews and administrative reviews of certifications for limited resource farmer or rancher and/or beginning farmer or rancher.
- (2) Refer to [440-CPM, Part 514, Subpart G, Maintenance, Management, Monitoring, and Enforcement](#), for additional quality control policy for Wetland Reserve Program easements.
- (3) Refer to [440-CPM, Part 519, Subpart G, Conservation Easements](#) for additional policy on Farm and Ranchland Protection Program easements.

C. Roles and Responsibilities

State Conservationists and Directors, Pacific Islands and Caribbean Areas, are responsible for:

- (1) Providing training and followup to correct any recurring deficiencies or problems associated with conducting contract reviews in the State Quality Assurance Plan.
- (2) Organizing, conducting, and documenting the results of Contract Reviews.
- (3) Modifying the State Quality Assurance Plan based on the results of prior-year reviews.
- (4) Delegating contract review responsibilities within the State.
- (5) Coordinating contract review activities with cooperating entities.
- (6) Developing and implementing corrective actions identified in contract review findings.

The AD for Programs is responsible for carrying out the Director's responsibilities for conducting annual easement reviews in the PIA by June 30. Annual conservation contract reviews in Protracts will be completed by June 30 by the DCs with guidance from the ADFOs. Easement and Contract review spot checks will be conducted as part of field office (service center) quality reviews (Appendix A – Annual Schedule of Office Quality Reviews), or independently as needed to meet the General Manual policy (GM.340.404.33).

VI. CIVIL RIGHTS COMPLIANCE REVIEWS

Civil rights compliance reviews in the PIA will be conducted in accordance with the policy and guidance on civil rights requirements in administering program activities provided by the NRCS, as included in the [General Manual, Title 230, Part 405.9 CR Compliance Reviews](#).

A. Policy

Following are the requirements for civil rights compliance reviews within States in Section 405.9:

- A. State Conservationists (and Directors) shall conduct periodic (every 3 to 5 years) compliance reviews of area, field, and project offices to evaluate and monitor progress in program delivery compliance with nondiscrimination regulations.
- D. The office performing compliance reviews will prepare and issue a report on the findings, noncompliance, recommendations, and commendable items. Review reports will be provided to the appropriate NRCS official of the location being reviewed upon completion of the review. Report on the reviews conducted by the State should be completed within 10 working days following the review.
- E. If a review discloses noncompliance that results in required actions or recommendations, corrective actions must be taken or a plan to correct the deficiencies must be completed within 30 days after issuance of the review report. When all required actions are satisfactorily completed, the review will be closed. Copies of the last two civil rights reviews shall be retained in the reviewed office. This information shall be made available to all authorized personnel in NRCS, USDA, and DOJ (Department of Justice) upon request. All reports will include the statement "For Official Use Only."

B. Roles and Responsibilities

The AD for Administration is responsible for carrying out the Director's responsibilities for conducting civil rights compliance reviews in the PIA.

Civil rights compliance reviews in the PIA will be conducted as part of office quality reviews (Table 1 – Annual Schedule of PIA Office Quality Reviews), or independently as needed to meet the General Manual policy ([GM 230, Part 405, Subpart A, General, Section 405.9](#)). The "**Pacific Islands Area Civil Rights Compliance Review Guide**" will be used to conduct compliance reviews for each of the offices.

VII. CONSERVATION PLANNER CERTIFICATION REVIEWS

A. Policy

Policy regarding conservation planner certification is included in the PIA state supplement to the General Manual, Title 180, Part 409– Conservation Planning Policy (<http://www.pia.nrcs.usda.gov/technical/>).

The policy requires that all plans developed with the assistance of NRCS employees and others will be approved by a certified conservation planner. Approval from a certified specialist is also required for certain components of Comprehensive Nutrient Management Plans (CNMPs) associated with animal feeding operations and nutrient and pest management components of regular conservation plans. Certified conservation planners and specialists may include NRCS employees and others (volunteers, and employees of Soil and Water Conservation Districts and State conservation agencies) that have requested to participate.

B. PIA Conservation Planner Certification Reviews

In order to obtain initial conservation planner and specialist certifications, candidates are required to meet minimum criteria including having appropriate knowledge, skills, abilities as demonstrated by the completion of courses and training, the acquisition of Job Approval Authorities, job experience, and/or the completion of plan reviews.

The Director has determined that the minimum criterion also applies to others (volunteers, and employees of Soil and Water Conservation Districts and PIA conservation agencies) that have requested to participate.

Certified conservation planner and specialist designations are valid for three years. In order to maintain certification, candidates must complete additional training, maintain Job Approval Authorities, and/ or complete plan reviews.

Candidates (NRCS employees and others) are responsible for meeting the requirements to obtain and maintain their conservation planner and specialist certifications.

A candidate's supervisor and/or ADFO will contact the AD for Technology to request conservation plan reviews for obtaining initial conservation planner and/or specialist certifications. The AD for Technology will assign staff to conduct conservation plan reviews for initial certification purposes in the PIA. Re-certifications will be completed by the ADFO or the designated Area staff. Employees who transfer with certifications should contact the AD for Technology for proper procedures.

Candidates must use the appropriate certification or recertification worksheet to track and document completion of the requirements.

Candidates will sign the worksheet to certify completion of all of the requirements for conservation planner certification; have their DC or supervisor sign the worksheet to verify completion of all the requirements; make a copy of the worksheet for his/her own records; and then send the original to the AD for Technology at the NRCS PIA State Office.

The AD for Technology will review and recommend certification by signing the worksheet; obtain the appropriate ADFO and the Director's approval for certification; and then send a letter to the candidate confirming certification.

The ADFOs will update the Planner Certification / Recertification Tracking Worksheet located in the PIA State Office shared drive at least quarterly.

By Sept. 30th, the ADFOs and DCs will ensure that all NRCS employees and others who approve conservation plans have obtained and maintained conservation planner and specialist certifications in their area of responsibility.

By October 31st, the ADFOs will prepare an end of fiscal year planner certification status report for all field offices in their Area. A copy will be provided to the DCs, the AD for Operations, ADT, SCE, and the Director.

VIII. JOB APPROVAL AUTHORITY REVIEWS

A. Policy

Job Approval Authority (JAA) policy is included in the PIA state supplement to the General Manual, Title 180, Part 409 Conservation Planning Policy (<http://www.pia.nrcs.usda.gov/technical/>).

The policy requires that all work associated with implementing conservation practices be approved by NRCS employees and others with appropriate Job Approval Authority (JAA).

The work includes the inventory and evaluation of information needed to design a practice; the development of design documents or job specifications in accordance with the practice Standard and Specification; and certification that the practice was installed in accordance with

the design documents or job specifications.

NRCS may delegate JAA to NRCS employees and others (volunteers, and employees of Soil and Water Conservation Districts and partner conservation agencies) that have requested to participate.

B. PIA Job Approval Authority Reviews

For initial JAA, all candidates (NRCS employees and others) must have appropriate knowledge, skills and abilities as demonstrated by the completion of courses and training, job experience, with emphasis on competence and ability demonstrated via the quality work items completed. All will be reviewed and approved by an NRCS employee authorized to delegate JAA (delegator) via appropriate JAA worksheets. The employee's supervisor is required to provide concurrence of the employee's delegated JAA.

Candidates may increase their JAA levels and are required to maintain their JAA via re-delegation. Each delegated JAA per practice and level is valid for three years. The requirements for increasing and re-delegating JAA are the same as for delegating initial JAA.

Candidates are responsible for meeting the requirements for obtaining, increasing, and maintaining their own JAAs.

The AD for Technology has overall responsibility for the JAA reviews for ecological practices and the State Conservation Engineer has overall responsibility for the JAA for engineering practices for the entire PIA. The actual reviews and delegation of JAA for ecological and engineering practices may be conducted by state- or area-level specialists.

The ADFOs are responsible for updating the JAA Tracking Worksheet located in the PIA State Office shared drive at least quarterly.

By Sept. 30th, the ADFOs and service center supervisors will ensure that all NRCS employees and others who approve work associated with implementing conservation practices have obtained and maintained appropriate JAA.

By October 31st, the ADFOs will prepare an end of fiscal year JAA status report for all field offices in their Area. A copy will be provided to the DCs, the AD for Operations, ADT, SCE, and the Director.

IX. PERSONALLY IDENTIFIABLE INFORMATION (PII)

PII is information that can be used to distinguish or trace an individual's identity. There is public PII, such as name, address, phone number, etc. and private PII, such as social security numbers, passport numbers, bank accounts, birth dates, mother's maiden name, etc. **GM 270, Part 418** provides a more lengthy list and explanation in protecting PII.

Per Department Regulation, every employee who has access to PII of other employees, contractors, or the general public through the course of his/her employment is required to safeguard and protect such information from unauthorized disclosure. Access to PII must be restricted, all devices must be safeguarded and sanitized when no longer in use, documents with PII must be shredded when no longer needed, documents that contain PII (e.g. contracting case files) must be locked up when not in use. In addition, documents with PII temporarily stored on a SharePoint site must be encrypted.

The PIA SharePoint administrator along with all the Leadership staff will actively monitor the PIA SharePoint site for unrestricted PII. A more formal bi-annual review of the site will also be conducted by the PIA SharePoint administrator. A brief report of results will be sent to the Director by September 30 of each fiscal year.

Every employee is required to immediately report any known or suspected breach of PII safeguards or policies, or actual unauthorized disclosure of PII to his/her immediate supervisor. In addition, **the PII incident hotline is 1-888-296-2373.**

X. CORRECTIVE ACTION PLAN

A. Background

National Bulletin 340-12-8 required each State to implement, update, and monitor a Corrective Action Plan (CAP) to identify and eliminate deficiencies identified by program delivery reviews conducted by Oversight and Evaluation (O&E) of 20 States during fiscal years 2010-11.

The findings from these reviews are similar from State-to-State. Therefore, CAPs are required for all States to address each common finding. These common findings are referred to as national findings for development of the CAP. CAPs are a written strategy for correcting or eliminating a problem that has already occurred or been identified through internal and external compliance reviews and studies. In addition, CAPs are designed to ensure specific issues are addressed and similar problems do not occur in the future.

B. Required Actions

1. Update the original 2012 PIA CAP to ensure the corrective action items adequately addresses each of the seven national findings.
2. Post the updated 2013 PIA CAP on the Regional Conservationists' SharePoint site.
3. Responsible persons as listed in the 2013 PIA CAP will implement the action items as assigned.
4. Responsible persons will update progress on the 2013 PIA CAP on a quarterly basis (March 15, June 15, September 15, and December 15).