

GM-450-407 Documentation, Certification, and Spot Checking Policy

Pennsylvania NRCS Supplemental Policies and Procedures

Supplemental Policy

In addition to GM-450-407 Subpart A policy for Documentation, Certification, and Spot Checking, the following policy supplements apply in Pennsylvania according to the 7 responsibilities listed in GM-450-407.2:

- (1) Planning, installation, and certification information to be obtained, recorded, and filed for all practices:

The supporting data and information to be obtained, recorded and filed during practice check out is listed in the Ecological Practice Check-Out Document or the Engineering Practice Design and Check Data Requirements Document which are found in Section IV of the Pennsylvania Field Office Technical Guide along with other practice supporting materials.

Check-out documents, supporting data, and all planning, installation, and certification information for conservation practices will be recorded and filed in the conservation planning case file according to the requirements of the appropriate conservation program.

Information about practices planned and installed under Conservation Technical Assistance (CTA) funds will be recorded and filed in accordance with NPPH, Section 600.3, Plan Format and Content and the conservation plan requirements of M-440-505-A - Subpart A - Conservation Planning. Format and content requirements for financial assistance and easement programs are also listed in the same subpart of CPM-440 - Part 505 under their appropriate subpart.

In addition, NRCS employees certifying practices in Protracts for payment will record in the comments section the name of the employee, Technical Service Provider (TSP), or qualified non-TSP who actually performed the check-out of the completed practice.

Practice planning, installation, and certification records will be retained and disposed of according to national policy for Storing, Retrieving, Accessing, Retaining, and Disposing of Records found in GM-120-408 - Part 408 – Records.

- (2) The requirements and procedures for spot checking installed practices.
The national spot checking procedure identified in GM-450 - Part 407 Subpart C will be followed along with supplemental requirements contained at the end of this section under the title Supplemental Spot Checking Procedures.

(3) Non-cost-shared items to be spot checked.

As stated in GM-450 - Part 407 Subpart C, section 407.20B, all conservation practices including non-cost-shared practices are subject to spot checking.

Other non-cost-shared items such as planning activities and resource management systems listed in Section III of the FOTG will be subject to compliance with applicable planning standards as described under the national **GM-180-409 Conservation Planning Policy** and related Pennsylvania supplements.

(4) Accepting work of those outside NRCS.

Work may be accepted by those outside of NRCS if the work meets standards and specifications and is reportable in NRCS reporting systems. Check-out documents may be signed by those outside of NRCS for practices that need to be certified for payment for any program and/or for reporting practices applied under Conservation Technical Assistance funds as well.

Work may be accepted by conservation district employees, Technical Service Providers, and/or non-TSP partners. Technical Service Providers must be registered in TechReg under the appropriate technical service category for which they qualify related to the work performed. Non-TSP partners who provide expertise and services to customers on NRCS's behalf through an agreement may include private contractors and consultants, Earth Team volunteers, Federal and State Agency employees, Non Profit employees, and other non-TSPs.

Conservation district employees and non TSPs must meet the qualification requirements as described by the appropriate GM Policy and PA supplements for NRCS job approval and or certification programs as well as all applicable state laws and regulations. Job approval and or certification programs exist for engineering practices, nutrient management assistance, pest management assistance, prescribed burning assistance and other practices as may be added.

Qualified individuals outside of NRCS must follow the requirements of the Statement of Work for each practice.

(5) Responsibilities of line officers.

The State Conservationist is responsible for the overall quality of documentation, certification, and spot checking of all practices. On the State Conservationist's staff, the State Resource Conservationist is responsible for overseeing the spot check activities performed by ecological sciences discipline specialists and the State Conservation Engineer is responsible for overseeing the spot check activities performed by engineering discipline specialists. The TSP Coordinator who assists with the management operations of TSP assistance may assist with spot check activities related to practices performed by TSPs.

Assistant State Conservationists for Field Operations and Supervisory District Conservationists are responsible for ensuring that work performed by anyone in their area or field team including employees, TSPs, and non TSPs related to

planning, installation, and certification of completed practices is in compliance with applicable standards and specifications.

- (6) Format for recording information on each practice and the method of filing.
The established format for recording check out information for an ecological practice is the Ecological Sciences Practice Check-Out Document and for an engineering practice it is the appropriate engineering design, check notes, or other similar records as required by the Engineering Design and Check Data requirements.

Supporting data related to documenting check out of an Ecological Science Practice may be recorded on the practice job sheet, other similar document, or on the Check-Out Document itself. Instructions for using Ecological Science Practice Check-Out Documents and supporting data may be found in the footnotes of the document or developed separately in the PA FOTG.

Check out documentation is typically recorded in the color red and may be recorded by any other format acceptable to the Field Team Supervisory DC.

Practice deficiencies must be recorded and filed in the program case file and can be recorded either on program contract reviews, practice check out documents, letters, or other similar documents as acceptable to the local Field Team Supervisory DC for communicating to the program participant.

Spot Check documentation will also be recorded and filed in the program case file.

- (7) Include checks of supporting data and the spot-checking procedure in program and functional appraisals.
Program and functional appraisals will be scheduled in the State Quality Assurance Plan and will include spot checks of supporting data according to the procedures outlined in this policy and supplement.

Supplemental Spot Checking Procedures

In addition to the national GM-450-407-C Spot Checking procedure, the following supplemental procedures will be carried out in Pennsylvania:

A. Offices to be Spot Checked

Each field office on every Field Team in the state will be spot checked at least every third year. The Assistant State Conservationist for Field Operations will identify which field offices will be spot checked in the upcoming year according to a three year rotation schedule by October 15 each year.

B. Practices to be Spot Checked

A report titled Summary of Conservation Practices Applied developed from data generated from IDEA will list the total occurrences of each kind of practice applied during the prior fiscal year in all field offices statewide. The data will be collected and the report will be distributed to personnel assigned to perform spot checking by October 15th.

The Summary of Conservation Practices Applied Report will identify the total occurrences of practices completed for each type of practice applied by each type of NRCS program in each field office, the prior year's payment rate for the practice, and the total statewide amount of NRCS program financial assistance funds used to install each kind of practice.

The State Resource Conservationist and the State Conservation Engineer will review the Summary of Conservation Practices Applied Report each year and identify those kinds of practices which pose a high risk to life, property, and the environment. They will also review the report to prioritize the practices to be spot checked according to the practices to be spot checked procedures outlined in the national policy.

Conservation Activity Plans, while considered as eligible practices for EQIP financial assistance, are to be reviewed along with other planning activities according to the national **GM-180-409 Conservation Planning Policy** and related Pennsylvania supplements.

C. Frequency

Long term vegetative practices must be spot checked during the season of active growth and can be spot checked up to 3 years after the year the practice was applied. Since annual vegetative and management practices will be spot checked up to 3 years after they are completed, spot checks of annual vegetative and management practices should also be encouraged on units of the practice being performed in the current year in order to compare observable conditions with recorded data from prior years.

D. Amount of Spot Checking

The State Resource Conservationist and the State Conservation Engineer will review the occurrences of each practice in the Summary Report and identify the amount of practices to be checked according to the procedures outlined in the national policy.

An occurrence of a practice is the application of all units planned during the same year as documented in a particular case file.

E. Spot Checks of Qualified Contractors and Other Qualified Individuals (non-TSPs).

Supervisory District Conservationists will identify all of the engineering and/or ecological practices installed by qualified contractors and other non-TSPs in their field team area and send a report to the State Conservation Engineer or State Resource Conservationist as appropriate by October 15th. The report will identify the practice name, number of units applied, tract number, county location, and name of the qualified contractor or other non-TSP who performed the work. 5% of the jobs completed by qualified contractors or other non-TSPs Statewide will be selected for spot checking.

F. Spot Checks of Conservation Practices completed by TSPs

Supervisory District Conservationists will identify all of the engineering and/or ecological practices installed in their field team area by TSPs and send a report to the State Conservation Engineer or State Resource Conservationist as appropriate by October 15th.

TSPs work will be spot checked every year in accordance with GM-180 Technical Services Provider policy.

G. Select the Installation to be Spot Checked

Personnel selecting the installation to be spot checked in the field office area will randomly select case files that contain as many of the high priority practices identified in the annual Summary of Conservation Practices Applied Report.

To ensure that the work of each staff member of the office is checked a minimum of once every 3 years case files shall be selected containing work performed by every employee that worked in the office since the last spot check even if they have relocated since then.

H. Personnel

Discipline specialists at the State, Area, or Field Office level may perform spot checks of practices under their disciplines responsibility. If the lead discipline specialist is unable to perform a spot check, the spot check may be designated to another Area or Field employee with concurrence of both the Supervisor of the lead discipline specialist and the Supervisor of the Area or Field employee.

Any employee completing a spot check will have demonstrated knowledge and competency and any JAA or Certifications that may be required for a particular practice. Practices requiring a job approval authority or a certification level include all engineering practices, prescribed burning, nutrient management, pest management, and other practices as may be added.

I. Method of Spot Checking

Personnel performing spot checking will use the Engineering Design and Check Data requirements and the Ecological Check-Out Documents located in Section IV of the Pennsylvania FOTG to determine the items that should be checked for each practice.

Personnel assigned to perform spot checks will schedule field office visits in advance with local staff at times of the year appropriate to viewing functioning practices.

Technical Spot Check Reports titled 'Technical Spot Check Review for Ecological Science Practices' for Ecological Science Practices and 'PA Eng 18' for Engineering Practices will be generated for each spot check performed.

Spot checks should be carried out as a learning opportunity for staff. Many problems can be immediately solved during the spot check visit itself. TSPs and non-TSPs may attend the visit but are not required.

The Technical Spot Check Report should provide general comments such as notes about the review, commendations and positive observations, lack of O&M by the client, inadequate supporting documentation, and other minor technical insufficiencies as distinguished separately from major technical deficiencies such as installations not meeting standards and specifications, improperly designed practices, improperly checked out or certified practices, or other findings that make the practice not meet its intended function. The report should also document all required corrective actions for the case file reviewed, required and/or suggested training, and other helpful suggestions for future work of the NRCS employee, qualified non TSPs and TSPs.

J. Reporting

Personnel performing the spot check will provide all original Technical Spot Check Reports to the Assistant State Conservationist for Field Operations managing the area where the field office spot check is located. The Assistant for Field Operations will provide copy of the reports to the appropriate Supervisory District Conservationist and the District Conservationist as applicable. Personnel performing the spot check will provide a copy of the report to the Assistant State Conservationist for Operations for work completed by TSPs, a copy of Technical Spot Check Reviews for Ecological Science Practices to the State Resource Conservationist and a copy of the PA Eng 18's to the State Conservation Engineer.

All Technical Spot Check Reports should be completed and delivered as soon after as possible of the completion of the spot check and no later than December 31st. The State Conservation Engineer and State Resource Conservationist will have the reports summarized and identify trends and

actions applicable to the field offices spot checked and/or to the State as a whole. The Summary Spot Check Report will be delivered to the State Conservationist by January 15th in order to be included in the State Quality Assurance Report due to NHQ by January 31st.

K. Follow-up

All deficiencies will be reported to the Assistant State Conservationist for Field Operations. In addition, all deficiencies related to financial assistance that require follow up actions will also be immediately reported to the Assistant State Conservationist for Financial Programs or the Assistant State Conservationist for Easements as appropriate.