

For: State and County Offices

National Target Review of FY 2013 CRP Status Reviews

Approved by: Associate Administrator for Operations and Management



1 Overview

A Background

Memorandum of Agreement, dated June 29, 2012, between NRCS, FSA, and CCC requires, in part, that NRCS conduct annual status reviews of practice implementation on at least 10 percent of CRP contracts. 2-CRP, subparagraph 601 B requires annual status reviews to be completed by the end of each FY.

Completing CRP status reviews is a manual process. There is no automated method for reporting annual status review data. This prevents the National Office from evaluating the effectiveness of completed status reviews.

A national CORP target review has been developed to sample CRP status reviews completed in FY 2013 to determine whether:

- the quality of information provided by NRCS on status reviews meets 2-CRP requirements
- required actions were taken by County Offices if compliance issues were identified by status reviews.

B Purpose

This notice provides instructions for implementing a national target review of CRP status reviews completed in FY 2013.

Disposal Date	Distribution
June 1, 2014	State Offices; State Offices relay to County Offices, CORP Coordinators, and COR's

2 Scope of the National Target Review

A Universe

In FY 2013, 17,044 CRP status reviews were completed in 45 States.

B Universe Determination Method

Because no automated CRP status review data is available, the universe was determined by a manual reporting process directed by the National Office.

Each County Office manually determined the number of CRP status reviews completed during FY 2013 and reported the total to the State Office. Each State Office:

- compiled the totals from County Offices into a State list that was submitted to ORAS
- provided the requested data that ORAS compiled into a national list yielding a universe of 17,044 completed status reviews.

C Sample Size

The sample for the national target review is:

- 600 CRP status reviews across 40 States
- a random sampling of CRP status reviews in the States selected by ORAS.

D Sample Selection Method

ORAS determined to sample a total of 600 CRP status reviews based on a combination of the following factors:

- sample sizes selected in recent national target reviews
- estimated timeframe for completing the national target review.

ORAS determined each State's sample using the following 3-level selection process.

Level	Action
1	The percent of CRP status reviews to be sampled in each State was proportionally determined by taking the total number of status reviews completed in that State and dividing it by the total number of status reviews in the universe. Example: State A had a total number of 120 status reviews completed in FY 2013 that was divided by the universe of 17, 044 status reviews. The percent of status reviews to be sampled in State A is 0.7 percent. When added together, the percent of status reviews to be sampled in each State totaled 100 percent.

2 Scope of the National Target Review (Continued)

D Sample Selection Method (Continued)

Level	Action
2	The number of CRP status reviews to be sampled in each State was proportionally determined by multiplying the percent of status reviews completed in that State, as determined in Level 1, by the overall sample number of 600. Example: State A had 0.7 percent of the total status reviews completed in FY 2013 multiplied by the overall sample number of 600. The number of status reviews to be sampled in State A is 4.2, rounded to 4 status reviews ($0.007 \times 600 = 4.2$). When added together, the number of status reviews to be sampled in each State totaled 600.
3	The specific counties in each State to be reviewed were selected randomly by ORAS using an automated random number generator.

E Extent of the National Target Review

The review of selected CRP status reviews will cover:

- how CRP-1's were selected for annual status reviews
- the adequacy of documentation provided to FSA
- whether proper followup action was taken on noncompliance cases.

Note: CRP payments and payment activity are **not** included in the national target review.

F Verification Items

See Exhibit 1 for a detailed list of verification items.

G Reportable Findings

See Exhibit 2 for a list of possible reportable findings.

3 COR Assignments

A ORAS Making Assignments

ORAS will make preliminary COR assignments. Some COR's will be assigned reviews outside of their normal assigned States. ORAS will work with applicable CORP coordinators to make any changes in the assignments.

B Priority

Reviews of CRP status reviews shall be scheduled in a manner that will allow the national target review to be completed by **March 7, 2014**.

3 COR Assignments (Continued)

C Travel Requirement

No travel will be authorized for the national target review.

D Scheduling Reviews

COR's shall work with CORP coordinators to schedule reviews. COR's assigned to conduct reviews outside their normal assigned States will be provided the contact information of the applicable CORP coordinator or SED by ORAS.

4 Conducting the National Target Review

A Basic Policy

The national target review is designed to be conducted at the COR's headquarter location.

B Integrity of the National Target Review

County Offices will be asked to send documentation directly to COR. It is **required** that the documentation **not** be altered before being sent.

If County Offices discover errors with the documentation to be sent to COR, the documentation shall be sent **before** making any corrections. After the documentation is sent, County Offices may begin the necessary corrective actions.

C Entrance Conference

An entrance conference shall be held by telephone. COR, in consultation with SED, shall determine who is required to participate in the telephone conference.

Before or during the entrance conference, COR shall request a list of all CRP contract numbers for which a CRP status review was completed in FY 2013.

Notes: The list of FY 2013 completed status reviews shall be provided to COR within **1 workday** of the request.

When State Offices were requested to obtain the universe data for their State, as described in subparagraph 2 B, it was suggested that State Offices have each County Office prepare and retain a list of CRP contract numbers for which status reviews were completed in FY 2013. This list would then be readily available to provide to COR if the County Office was selected for review.

4 Conducting the National Target Review (Continued)

D Conducting More Than 1 Review at a Time

COR's may conduct multiple reviews at the same time.

E Obtaining Required Documentation

COR shall contact the County Office and request the required documentation be provided using 1 of the following methods:

- FAX
- scanned and e-mailed
- mailed.

Notes: Other ways for providing documents electronically are also acceptable.

Documentation should only be mailed if mailing is determined to be the most cost efficient method.

County Offices shall be given **3 workdays** to provide the requested documentation.

Any documentation containing PII data shall be protected according to current FSA policy.

See subparagraph F for a list of documentation that will be requested during the review.

F Required Documentation

COR shall request copies of the following documentation for each CRP status review selected for the national target review:

- CRP-1
- NRCS-LTP-013 (Status Review) or equivalent document or form
- Conservation Plan of Operation
- all documentation about any noncompliance found during the status review, if applicable
- any other documentation determined necessary by COR.

G Documenting Reviews Using Electronic CORP (eCORP)

COR shall:

- document each review using eCORP

Note: In eCORP, use National Code Designation, "**8 - FY 2013 CRP Status Reviews**" to identify the review.

4 Conducting the National Target Review (Continued)

G Documenting Reviews Using Electronic CORP (eCORP) (Continued)

- if CRP status reviews are applicable to a:
 - combined county, issue 1 report that covers all counties in combination using the actual headquarter county as the eCORP “Headquarter” county
 - shared management county, issue a separate report for **each** county
- use eCORP, Exhibit 50.0, “**CRP Contracts**”, as the **only** exhibit in reports
- select “**CRP-1**” as the record type for each status review to be reviewed

Note: The record ID type will be “**Contract**” and the record ID will include the:

- CRP-1 (contract) number
- approval date of CRP-1.

Example: “0286; Mar 1, 2012”.

- include the following information in eCORP, Exhibit 50.0, “**Program Overview Narrative**”:
 - total number of CRP status reviews completed, according to the list provided by the County Office in subparagraph C
 - number of records that have noncompliance issues

Note: If no records have noncompliance issues, include the comment “**No noncompliance issues**”.

- use the eCORP findings in Exhibits 2 to report findings.

Note: Reportable findings are limited to **only** findings listed in Exhibit 2.

H Random Samples

COR’s, using the list of CRP-1 numbers provided by the County Office, shall use the eCORP random number generator to select the required CRP status reviews to be reviewed.

4 Conducting the National Target Review (Continued)

I Draft Reports

At least 1 workday **before** the exit conference, COR shall provide CED a draft copy of the eCORP report with all findings and recommendations included.

Note: The draft report is **not** required to have the analysis completed.

By providing the draft report before the exit conference, CED will have an opportunity to review the findings and address any issue in advance of the exit conference.

J Exit Conferences

An exit conference shall be held by telephone. COR, in consultation with SED, shall determine who is required to participate in the telephone conference.

5 Using Comments in eCORP

A Importance of Comments in the National Target Review

When documented appropriately, comments provide a detailed explanation of the particulars of a finding, a record associated with a finding, or both.

Comments are important for the national target review, because they can yield additional insight ORAS may use in:

- analysis of the results of every report issued
- preparation of the final report of review results.

It is not necessary, or desirable, to use comments for everything, even in the national target review. However, COR's are encouraged to include comments when comments will provide clarification or pertinent information.

B Finding Comments

A comment added to a finding applies to the overall finding. If a certain issue applies to most or all of the records listed for the finding, that issue can be summarized in the finding comment, rather than repeating the same comment for each record.

C Record Comments

A comment added to an individual record applies **only** to that record. When an issue or issues are significantly different among records, it may be best to use a record comment for each record, especially if a satisfactory summary for a finding comment cannot be achieved.

6 Timeframes

A When the National Target Review Will Be Conducted

The national target review may begin **immediately** after receipt of this notice.

All reviews shall be **completed and reports issued** no later than **March 7, 2014**.

B Corrective Action Plan (CAP) Approval

CAP's are required to be approved within 10 workdays of the report date. Request for an extension may be submitted to ORAS by SED or CORP coordinator.

C Closing Reports

Closing reports are **required** to be submitted to SED within 30 workdays of the report date. Requests for extensions may be submitted to ORAS by SED or CORP coordinator.

7 Policy and Procedure Questions

A Questions About the Scope of the National Target Review

Contact ORAS with any questions about policies and procedures for conducting the national target review.

B Questions About Specific CRP Procedures

COR's shall contact the applicable State Office program specialist, for the applicable State, with any questions about specific program policies and procedures for a specific review.

COR's may contact ORAS if the State Office specialist **cannot** provide an adequate answer or is **not** available. When this occurs, ORAS will consult the applicable National Office program division for guidance.

Verification Items**A Overview**

Verification items in this exhibit are thought provoking statements and questions to be considered when conducting the national target review.

B Verification Items

The following are verification items for conducting the national target review:

- FSA and NRCS worked together to select the contracts and practices on which to complete CRP status reviews
- CRP status review was documented on NRCS-LTP-13 or equivalent electronic form
- documentation adequately indicates the progress of the practice establishment
- documentation provides the necessary information about noncompliance cases
- proper followup action was taken and documented on noncompliance cases.

Reportable Findings

A Overview

This exhibit provides reportable findings for the national target review. The findings are divided into the following categories:

- process of selecting contracts and practices
- documentation of completed CRP status reviews
- followup actions.

Important: Use only the findings listed in this exhibit.

The scope of the national target review is very narrow. The accuracy of the information on CRP status reviews is **not** part of the scope of the national target review. NRCS' work is **not** being evaluated. Rather, the scope of the national target review is focused on whether the general quality of information on the CRP status review (taken at face value, **without** any other frame of reference) is adequate enough to enable the County Office to take appropriate actions, if required. If CRP status reviews:

- contain adequate information, there may be **no** reportable findings
- do not contain adequate information, reportable findings will apply.

B Process of Selecting CRP Contracts and Practices for Status Reviews

The following eCORP finding is to be used to report the finding about FSA and NRCS or TSP working together to select the contracts and practices on which status reviews will be performed.

Finding	eCORP Code
Handbook 2-CRP, Rev. 5, Par. 601, B FSA and NRCS or TSP did not work together to select contracts and practices to be included in the status review. Notes: Do not add records to this finding, because the overall planning process is being addressed. A finding comment is required, to explain how the contracts and practices to be included in the status review were selected.	466

Reportable Findings (Continued)**C Documentation of Completed CRP Status Reviews**

The following eCORP findings are to be used to report findings about the adequacy of documentation on CRP status reviews.

Records are **required** to be associated with all of the findings in the table.

Finding	eCORP Code
Handbook 2-CRP, Rev. 5, Par. 601, B Status review is not documented on NRCS-LTP-13 or equivalent electronic form. Note: Comments are required and need to identify what type of form or document was used to document the status review.	467
Form NRCS-LTP-13 Contract number is not identified on the status review. Note: If the status review is documented on something other than NRCS-LTP-13, but the contract number is identified, do not use this finding.	468
Handbook 2-CRP, Rev. 5, Par. 601, B Progress in practice establishment is not adequately addressed by the status review. Notes: This finding applies when progress in practice establishment is: • not addressed at all • addressed, but not adequately addressed. Comments are required. For each record associated with the finding, comments need to identify whether progress was: • not addressed at all • addressed, but not adequately addressed. Note: If progress is not adequately addressed, comments need to explain why it was not adequately addressed.	469

Reportable Findings (Continued)

C Documentation of Completed CRP Status Reviews (Continued)

Finding	eCORP Code
Handbook 2-CRP, Rev. 5, Par. 601, B Needed revisions are not adequately addressed by the status review. Note: This finding applies only when the status review documentation implies revisions are needed, but are not adequately addressed. Comments are required and need to explain why the revisions are not adequately addressed.	470
Handbook 2-CRP, Rev. 5, Par. 601, B Additional technical assistance needed is not adequately addressed by the status review. Note: This finding applies only when the status review documentation implies additional technical assistance is needed, but is not adequately addressed. Comments are required and need to explain why the additional technical assistance needed is not adequately addressed.	471
Form NRCS-LTP-13 Status review does not adequately address whether land is still under control of the participant. Note: If the status review is documented on something other than NRCS-LTP-13, but the issue is adequately addressed, do not use this finding.	472
Handbook 2-CRP, Rev. 5, Par. 601, B Status review is not signed by NRCS or TSP. Note: Whether signature date is present is not to be considered for this review.	473

Reportable Findings (Continued)

C Documentation of Completed CRP Status Reviews (Continued)

Finding	eCORP Code
Handbook 2-CRP, Rev. 5, Par. 601, B Status review is not signed by the participant. Notes: Whether signature date is present is not to be considered for this review. For the purposes of the national target review, the participant signature requirement is to be loosely evaluated. As long as 1 signature is present that can be interpreted as a signatory to CRP-1, or the representative of a signatory, that is sufficient for meeting the requirement of the verification item. If a representative signature is used, do not verify whether signature: • authority is on file • of representative is formatted correctly.	474

D Followup Action

The following eCORP finding is to be used to report the finding related to follow up action on noncompliance cases.

Finding	eCORP Code
Handbook 2-CRP, Rev. 5, Par. 601, C Proper follow up action on noncompliance case is not taken. Note: Comments are required and need to provide a description of the situation that includes, as applicable: • what action has been taken • what action has not been properly taken • if no action has been taken.	475