

Attachment

Suggestion for the ECM Document Naming

ECM could be set up to automatically name files. The first part of the file name would be completed with entity name information pulled from AMS. If possible, when typing the entity name, the field will start populating with information from AMS. The remainder of the file name parts would be chosen from drop down lists.

File name: JJ Livestock, September, 2010, Annual Report, Corrected

Entity Name	Month	Year	Document Type	Description	Description	Description
When typing, auto fill begins choices of names to select.	Jan - Dec	2010	Multiple Choices	Multiple Choices	Multiple Choices	Multiple Choices
			<i>examples:</i> Annual Report Registration Bond Bond Claim Scale Test Investigation Regulatory Custodial	<i>examples:</i> Corrected Amended CL1 Claimant name SW2 Work plan NOD Analysis	<i>examples:</i> Rider Trustee Letter	<i>examples:</i> Increase

RO-4: Enforcement

MAR Recommendations

- #1) Consider data validation that will require the agent to complete essential fields prior to closing the folder. This could be a simple check to see if the essential field in the database has been populated. If not, PAS will prompt the agent to complete the field prior to closing the folder.
- #2) The naming convention is an issue. Employees have various interpretations of the instructions, which results in numerous variations of file names in PAS and makes it difficult to determine whether the correct file is located in the correct folder. Suggest relooking at naming convention instructions to make them clearer, more concise, and easier to understand. Additionally, if at all possible, we recommend PAS be modified to build the file names automatically. All the agent would have to provide is basic information about the file such as the entity name, type of file, etc. and PAS should do the rest. This seems like a function that could be automated and this would remove any human error from the process.

MRO Response

In response to recommendation # 1

- MRO Packers and Stockyards agree that the PAS system should be modified to contain a prompt feature that will not allow an agent to close a folder without completing the “reason to close” line item.

In response to Recommendation #2

- The MRO Packers and Stockyards agree with the MAR recommendations. We strongly agree that errors could be greatly reduced by modifying ECM to automatically name files. A suggestion has been submitted to the CCWG for Naming Convention Changes.
- The suggestion submitted is for the first part of the file name to be completed with entity name information pulled from AMS. If possible, when typing the entity name, the field will start populating with information from AMS. The remainder of the file name parts would be chosen from drop down lists. (see attachment for further explanation of suggested changes)

RO-5: Bond/Trust Claim

MAR Recommendations

- #1) Until a better tracking system is in place, suggest using the claim spreadsheet to establish clear traceability of claims, whether valid or not. This will serve as supporting documentation in all bond claim files to verify all dates mailed in case a trustee needs to view the original source of compliant and for verification that claims were sent within the allotted time.
- #2) Suggest adding an enhancement for automated checks on appropriate folders to see if the claim analysis was attached. This check could be done by analyzing the files in the folder. The check would look at the file names to determine if the claim analysis was included. If the check determines the claim analysis is missing, PAS would send out an automated email alerting the agent to the issue.
- #3) The naming convention is an issue. Employees have various interpretations of the instructions, which results in numerous variations of file names in PAS and makes it difficult to determine whether the correct file is located in the correct folder. Suggest relooking at naming convention instructions to make them clearer, more concise, and easier to understand. Additionally, if at all possible, we recommend PAS be modified to build the file names automatically. All the agent would have to provide is basic information about the file such as the entity name, type of file, etc. and PAS should do the rest. This seems like a function that could be automated and this would remove any human error from the process.

MRO Response

In response to Recommendation #1

- The MRO Packers and Stockyards agree with the MAR recommendations.
- The MRO has established clearer bond/trust claim guidelines between the financial unit and the PSU. Guidelines have the LIEs responsible for saving PDF copies of all bond claim and trustee/surety letters under bond claim folders located on the I drive. This will provide documentation of all letters and the dates they were sent. The Financial Unit is responsible for all updates to the bond/trust claim spreadsheets. This will ensure that all fields in the spreadsheets are completed with notification dates, letter mailed dates, and claim received dates.
- The MRO has developed a bond and trust claim check off sheet that will be provided to all Financial and PSU that can be used to mark when each step in the process has been completed.

In response to Recommendation #2

- The MRO Packers and Stockyards agree with the MAR recommendations.
- The MRO Financial Unit Supervisor will be responsible for ensuring a completed bond and/or trust analysis has been uploaded to the bond/trust claim folder prior to closing the folder.

- The MRO has developed a bond and trust claim check off sheet that will be provided to all Financial and PSU that can be used to mark when each step in the process has been completed.

In response to Recommendation #3

- The MRO Packers and Stockyards agree with the MAR recommendations. We strongly agree that errors could be greatly reduced by modifying ECM to automatically name files. A suggestion has been submitted to the CCWG for Naming Convention Changes.
- The suggestion submitted is for the first part of the file name to be completed with entity name information pulled from AMS. If possible, when typing the entity name, the field will start populating with information from AMS. The remainder of the file name parts would be chosen from drop down lists. (see attachment for further explanation of suggested changes)

RO-6: Financial Instrument Termination / Expiration

MAR Recommendations

- #1) Consider enhancing data validation that will require the agent to complete the Termination Date field in PAS prior to closing the folder. This could be a simple check to see if the Termination Date field in the database has been populated. If not, PAS could prompt the user to complete the field prior to closing the folder.
- #2) Consider enhancing data validation that will require the agent to complete the Financial Instrument Type, Amount, and Date in PAS prior to closing the folder. This could be a simple check to see if these fields have been populated in the database. If not, PAS will prompt the user to complete the field prior to closing the folder.
- #3) The naming convention is an issue. Employees have various interpretations of the instructions, which results in numerous variations of file names in PAS and makes it difficult to determine whether the correct file is located in the correct folder. Suggest relooking at naming convention instructions to make them clearer, more concise, and easier to understand. Additionally, if at all possible, we recommend PAS be modified to build the file names automatically. All the agent would have to provide is basic information about the file such as the entity name, type of file, etc. and PAS should do the rest. This seems like a function that could be automated and this would remove any human error from the process.

MRO Response

In response to Recommendation # 1

- The MRO Packers and Stockyards agree with the MAR recommendations. We also recommend going a step further making the termination date a required field and not let the record be closed until this field is completed.
- MRO LIEs will be reminded to complete all fields for financial instrument terminations/expirations in ECM.

In response to Recommendation #2

- The MRO Packers and Stockyards agree with the MAR recommendations. We also recommend going a step further to make the financial instrument type, amount, and date required fields and not let the records be closed until these fields are completed. For LOCs, the LOC amount should populate along with the financial instrument type and date which already self populate in ECM.
- MRO LIEs will be reminded to complete all fields for financial instrument terminations/expirations in ECM.

In response to Recommendation #3

- The MRO Packers and Stockyards agree with the MAR recommendations. We strongly agree that errors could be greatly reduced by modifying ECM to automatically name files. A suggestion has been submitted to the CCWG for Naming Convention Changes.

- The suggestion submitted is for the first part of the file name to be completed with entity name information pulled from AMS. If possible, when typing the entity name, the field will start populating with information from AMS. The remainder of the file name parts would be chosen from drop down lists. (see attachment for further explanation of suggested changes)

RO-7: Scale Test Reports

MAR Recommendations

- #1) Establish traceability for tracking SW2 and SW3 letters. Currently, it is difficult to validate whether entities subject to the P&SP jurisdiction are legitimately complying with sending accurate and acceptable test reports on time. Even though, this process is in the process of being enhanced to enable a better tracking mechanism, a work around needs to be established as soon as possible so P&SP will not lose validity with regulating entities scales. Since SW2's are not being sent in compliance with the SOP, suggest relook at how batch files are being ran to include those tests a month ahead rather than just past due reports, allow checks for tests received, inaccurate but acceptable tests, and inactive scales, to reduce sending invalid letters, begin tracking the status of these letters and make use of the notes tab in ECM. Management may consider changing the SOP to a more realistic timeframe for sending SW2 letters if it's not possible to send the letter within one business day of discovering the report is late.
- #2) There are several instances where test reports were not received or response to the NOD was beyond the 30 day timeframe and no investigation was initiated and no notes are included in AMS to justify (see RO7 supporting documentation). Based on the query ran from PAS, five investigations were initiated during this timeframe for scale test not received, however, since letters are not being track it was difficult to trace. Suggest management review this matter to determine why investigations are not being conducted on these scale tests.

MRO Response

The MRO Packers and Stockyards agree and will implement MAR recommendations in regards to SOP RO7 Scale Test Reports.

In response to recommendation # 1

- All SW-1 and SW-2 scale letters are being generated through the AMS system. The MRO relies heavily on the accuracy of the computer program recently developed. MRO supports management decision of changing the Scale Test SOP to a more realistic timeframe for sending out SW2 letters. MRO hopes in the future that enhancements to ECM will allow them to trace reports. In the interim, the MRO will run manual queries of SW2 letters to determine if a letter needs to be sent.

In response to recommendation # 2

- MAR suggested management determine why investigations are not being conducted on delinquent scale tests. In response, the MRO believes there may be a difference in interpretation of a decision made by Senior Management at a **Management Team Meeting** held in **Fort Worth, TX** on **October 30 – November 1, 2007**.

- **Issue: Scale Test Reports (Fort Worth – 11/07)**

Decision: Current SOPs require an investigation for entities that do not respond with a scale test after the NOD response date is passed. In those situations, we will issue an NOV to close the investigation. If the entity fails to submit two scale tests in the calendar year as described in the regulations, the regions will open an investigation and submit for formal administrative action. *Brett Offutt will incorporate changes to the scale test requirements into the current initiative to update current scale regulations and get it into MSS clearance by January 15, 2008.*

MRO has reviewed scale tests to determine if any investigation would have been opened under Senior Management's decision and have found no instances where an investigation was required.