

# Management Accountability Review

## Eastern Regional Office

July 26th – 28th, 2011



### Areas Reviewed:

Standard Operating Procedures  
Strategic Business Plan  
Packers & Stockyards Automated System

## Executive Summary

The Packers and Stockyards Program (P&SP) Management Assessment Review Team (MART) conducted a Management Accountability Review (MAR) on July 26th through 28th, 2011, the remaining review and assessment was conducted by MART leader Regina Ware August 1 through 26th, 2011 of the following Eastern Regional Office (ERO) operational areas:

1. Standard Operating Procedures (SOP)
2. Strategic Business Plan (SBP) objectives
3. Packers & Stockyards Automated System (PAS)

An automated scoring module for each core process was developed and used to determine compliance with specific areas of the SOP's, SBP, and PAS that were identified as part of this MAR. For each area under review, the following scorecard was used to assess overall compliance.

GREEN	YELLOW	RED
Overall average per area between 90% to 100%; Minor improvements possible; No corrective action required; Less frequent audits required	Overall average per area between 70% and 89%; Findings, but no serious weaknesses; Corrective action required with follow-up from RD or more frequent audits	Overall average per area less than 70%; Material weakness discovered; Mandatory corrective action required with follow-up audit

Using this scorecard allowed the MART to identify those particular areas within the ERO that require attention or improvement. In some cases, the scorecard identifies changes needed for standard operating procedures. The following table depicts the ERO rating for each area reviewed. Additional details, including the overall score and findings/recommendations with supporting documents, are included in this report.

RATING	REVIEW AREA	SCORE
GREEN	RO-1: Registration and Bonding	90%
YELLOW	RO-2: Investigations	73%
YELLOW	RO-3: Regulatory Actions	88%
YELLOW	RO-4: Enforcement	83%
GREEN	RO-5: Bond/Trust Claims	100%
GREEN	RO-6: Financial Instrument Termination / Expiration	95%
YELLOW	RO-7: Scale Test Reports	84%

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## Introduction

The United States Department of Agriculture (USDA) Grain Inspection, Packers and Stockyards Administration (GIPSA), Management Accountability Program, requires that reviews of the Packers and Stockyards Program (P&SP) Headquarters and Regional offices be conducted. Administrative Instruction (AI-3) sets forth the components of this program to ensure compliance with P&SP policies and procedures and with OMB Circular A-123's standards for management controls.

Data was abstracted from PAS for activities completed within the third quarter. The MART Leader used the data for the initial validation, assessment, and selection of random sampling sizes. On July 26 and 27, 2011, the Management Assessment Review Team (MART) reviewed and evaluated the technical performance of the Eastern Regional Office (ERO). The remaining randomly selected data from PAS was assessed and evaluated by the MART leader from August 1 to 26, 2011. This MAR includes the time period of April 1<sup>st</sup> through June 30<sup>th</sup> in the following three operational areas: Standard Operating Procedures (SOPs), Strategic Business Plan (SBP) objectives, and Packers and Stockyards Automated System (PAS). The MART consisted of the following individuals:

- Regina Ware, P&SP, Headquarters PAS Administrator
- Peter Jackson, PLD, Headquarters
- Ladondra Taylor, LIE, Midwestern Regional Office
- Twala Samuels, Marketing Specialist, Eastern Regional Office
- Steve Mason, LIE, Eastern Regional Office
- Michelle Caldwell, Auditor, Midwestern Regional Office
- Patti Tolle, CRU Supervisor, Western Regional Office
- Nancy Speer, Auditor, Western Regional Office
- Bart Di Giovanni, RA, Eastern Regional Office
- Leslie Jordan, RA, Midwestern Regional Office
- Chad Curry, RA, Western Regional Office
- Will Arce, Marketing Specialist, Midwestern Regional Office

The MAR evaluated the ERO's ability to effectively and uniformly apply the rules and requirements set forth in the Department and Agency objectives and standards, policies, and PAS compliance. The MAR final report includes a summary of findings, recommendations, and supporting documentation. The findings section reflects significant items that require corrective action by the ERO and formal notification by memo to the Office of Deputy Administrator (ODA) that the item(s) were resolved, unless otherwise noted. For each finding, the recommendations section reflects the MART's suggestions for improving the performance in affected areas, some of which may not require formal notification

to the ODA. The ODA may conduct follow-up reviews to ensure that corrective action was taken for those instances that were deemed major.

## Methodology

The MART developed and used standardized review forms to determine and document compliance. The review forms contain the following sections: 1) Guidance, 2) Review Plan, 3) Results, and 4) Summary. An explanation of each section can be found in Attachment 1.

For each specific area of the SOP, SBP, and PAS under review, the number of instances examined was compared to the number of instances deemed compliant to determine an individual percentage. The number of instances was determined by selecting an appropriate sampling plan (either 100 percent inspection or random sampling). Most of the data was abstracted from PAS queries; however, the remaining data was abstracted from existing reports, spreadsheets, documents, and logs; all of which are documented on the review form. For this review, 100 percent verification was not possible in all areas, but the MART assures that a representative sample was sufficient for those not inspected at the 100 percent threshold. Each individual percentage was averaged to calculate an overall compliance percentage using the following scoring system:

GREEN	YELLOW	RED
Overall average per area between 90% to 100%; Minor improvements possible; No corrective action required; Less frequent audits required	Overall average per area between 70% and 89%; Findings, but no serious weaknesses; Corrective action required with follow-up from RD or more frequent audits	Overall average per area less than 70%; Material weakness discovered; Mandatory corrective action required with follow-up audit

## Findings and Recommendations

### RO-1: Registration and Bonding

The ERO obtained a green rating in this area minor material weaknesses were found in PAS Compliance. However, the ERO scored well in SOP Performance Objectives.

RATING	REVIEW AREA	SCORE
GREEN	RO1: Registration and Bonding	90%

P&SP Management Accountability Review Form				
Section 1 - Guidance				
<b>SOP</b>	<b>RO-1 Registration and Bonding</b>			
<b>SBP</b>	<b>Goal 1 - Increase level of compliance through preventive regulatory actions</b> <b>Objective 1 - Ensure those operating subject to the P&amp;S Act are properly registered and/or bonded and meet reporting requirements</b>			
Section 2 - Review Plan				
<b>Purpose of Review</b>	<input type="checkbox"/> Initial	<input checked="" type="checkbox"/> Periodic:	Annually	<input type="checkbox"/> Follow-up
<b>Frequency</b>	Annually unless otherwise specified			
<b>Sampling Plan</b>	Random sample			
<b>Validation</b>	SOP(1): Review PAS to obtain entity listing that required corrections in the registration and bonding process SOP(2): Review listing from PAS to obtain entities registered within scope of review SOP(3): Review PAS for NOD documentation			
Section 3 - Results				
		<b>Number Reviewed</b>	<b>Number Compliant</b>	<b>%</b>
<b>SOP Performance Objectives and Compliance</b>				
(1) Send paperwork to entity within five days of receipt for corrections		9	8	89%
(2) Send Acceptance Letter within five days after HQ approval		10	10	100%
(3) Send NOD with approval signature within one business day of receipt		6	6	100%
(4) SOP Checklist		30	25	83%
		<b>Average SOP Compliance</b>		93%
<b>SBP Activity Performance Standard</b>				
There are no Regional Office level Strategic Business Plan performance measures to be reviewed at this time				
		<b>Average SBP Compliance</b>		
<b>PAS Compliance (Checklist)</b>				
PAS Checklist		40	35	88%
		<b>Average PAS Compliance</b>		88%
Section 4 - Summary				
<b>Findings / Recommendations:</b> For reviews of ERO's Registration and Bonding process, there seems to be documents missing from the folder to validate that the entity was informed about a bond being needed.				
<b>Overall Rating:</b>	GREEN			90%
<b>Persons interviewed:</b>				
<b>Reviewers:</b>	2011 MAR TEAM-Peter Jackson, Twala Samuels, Leslie Jordan, Michelle Caldwell, Patti Tolle, Ladondra Taylor, Steve Mason, Nancy Speer, Bart DiGiovanni, Chad Curry, and Will Arce		<b>Date:</b>	July 26th and 27th

## Findings

*SOP Performance Objective (1): "Send paperwork to entity within five days of receipt for correction"*

- A total sample size of nine was reviewed because the data was reviewed for the third quarter only. Only one instance was found in which the ERO failed to send the correction letter within the allotted timeframe.
  - ECM # 65395 – Indicates that the correction letter was sent within six days instead of five.

*SOP Performance Objective (2): "Send acceptance letter within five days from receipt of registration"*

- A total of ten samples were reviewed. The ERO was found to be compliant with the acceptance letter to entity within the allotted timeframe

*SOP Performance Objective (3): "Send NOD with approval signature within one business day of receipt"*

- A total of ten samples were reviewed. There were no instances found in which the ERO failed to send an NOD within the allotted timeframe.

*SOP Checklist #1: "If new registrant, did the PSU staff send the Standard Packet and include POC information?"*

- A total of ten samples were reviewed. Of the ten, there were three instances found in which the ERO failed to send the Standard Packet and include POC information. There was one instance where the folder was not applicable to the question.
  - ECM #64466, 65152, 64129 – No letter issued stating a bond is needed.

*SOP Checklist #2: "If amended, supplemental, re-registration, or limited, did the PSU staff send appropriate paperwork to the entity within five business days of receipt to collect the necessary information?"*

- A total of ten samples were reviewed. Of the ten, only one instance was found in which the ERO failed to send the appropriate paperwork to the entity within five business days of receipt to collect necessary information.
  - ECM #10388 – No Amended Cover Letter

*SOP Checklist #3: "If paperwork is correct, did the PSU staff input information into PAS? Is documentation available showing appropriate letter was sent?"*

- A total of ten samples were reviewed. Of the ten, only one instance was found in which the ERO failed to input information into PAS.
  - ECM #64374 – Packer buyer isn't marked

*PAS Checklist #1: "Business entity and Address tab completed in AMS"*

- A total of ten samples were reviewed. There were no instances found in which the ERO failed to complete the Business entity and Address tab in AMS. However, one spelling error was found.

*PAS Checklist #2: "If market agency, dealer, or packer with volume over \$500,000 is financial instrument tab complete?"*

- A total of ten samples were reviewed. There were no instances found in which the financial instrument tab wasn't completed. However, there were two instances in which an incorrect select was made for character of business.

*PAS Checklist #3: “Entity paperwork included in ECM documentation folder”*

- A total of ten samples were reviewed. Of the ten, one instance was found in which the ERO failed to include entity paperwork in ECM documentation folder.
  - ECM #64867 – No trustee responsibility letter in folder.

*PAS Checklist #4: “Is the file naming convention correct?”*

- A total of ten samples were reviewed. Of the ten, four instances were found in which the ERO failed to use the correct naming convention. And of the six that were compliant there were formatting issues with the date.
  - Folder 65539, 65569, 46829, 80980 – There’s an inconsistent use of name for documents within the folder. Incorrect format was used for the date as well.

**Recommendations**

- 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.

**RO-2: Investigations**

The ERO obtained a yellow rating which requires attention in this area since material weaknesses were found in SBP Performance, SOP Performance Objectives and PAS Compliance.

<b>RATING</b>	<b>REVIEW AREA</b>	<b>SCORE</b>
<b>YELLOW</b>	RO-2: Investigations	73%

**The lack of attention and necessary corrective action in this area could cause potential harm to the industry in which P&SP is charged to protect.**

P&SP Management Accountability Review Form				
Section 1- Guidance				
<b>SOP</b>	<b>RO-2 Investigations</b>			
<b>SBP</b>	<b>Goal 2 - Attain compliance through investigation and enforcement</b> <b>Objective 1 - Expedite the timely completion of investigations</b>			
Section 2 - Review Plan				
<b>Purpose of Review</b>	<input type="checkbox"/> Initial	<input checked="" type="checkbox"/> Periodic	Annually	<input type="checkbox"/> Follow-up
<b>Frequency</b>	Annually unless otherwise specified			
<b>Sampling Plan</b>	100% Records inspection			
<b>Validation</b>	SBP(1-2) and SOP(1-3): Verify case files in PAS SOP(4): Randomly sample investigative case files in PAS			
Section 3 - Checklist Results				
	<b>Number Reviewed</b>	<b>Number Compliant</b>	<b>%</b>	<b>Numerical Score</b>
<b>SOP Performance Objectives and Compliance</b>				
(1) Close Rapid Response within 75 calendar days of receipt of complaint/ event				
(2) Close Level 1 Priority within 160 calendar days of receipt of complaint/ event	230	206	90%	
(3) Close Level 2 Priority within 100 calendar days of receipt of complaint/ event	15	11	73%	
(4) SOP Checklist	50	23	46%	
<b>Average SOP Compliance</b>		70%		
<b>SBP Activity Performance Standard</b>				
(1) Investigation and its related Enforcement were completed within timeframes established by the SOPs	10	7	70%	
(2) Initiate Rapid Response investigation within two business days from time of complaint/event				
<b>Average SBP Compliance</b>		70%		
<b>PAS Compliance (Checklist)</b>				
PAS Checklist	50	40	80%	
<b>Average PAS Compliance</b>		80%		
Section 4 -Summary				
<b>Findings / Recommendations:</b> Supervisors are not properly designated investigations with the correct priority level. The priority levels are defined in the Investigations SOP RO-2. The agents are not entering summary data into required fields such as Review date and location, violations, and etc.				
<b>Overall Rating:</b>	YELLOW		73%	
<b>Persons interviewed:</b>				
<b>Reviewers:</b>	2011 MAR TEAM-Peter Jackson, Twala Samuels, Leslie Jordan, Michelle Caldwell, Patti Tolle, Ladondra Taylor, Steve Mason, Nancy Speer, Bart DiGiovanni, Chad Curry, and Will Arce		<b>Date:</b>	July 26th and 27th

## Findings

*SOP Performance Objective (1): "Close Rapid Response within 75 calendar days of receipt of complaint/ event"*

- No rapid responses were completed during the review period.

*SOP Performance Objective (2): "Close Level 1 Priority within 160 calendar days of receipt of complaint/ event"*

- One hundred percent of the third quarter sample data was reviewed. The ERO had a 90% compliance rate for closing Level 1 Priority investigations within 160 days.

*SOP Performance Objective (3): "Close Level 2 Priority within 100 calendar days of receipt of complaint/ event"*

- There were no L2 Investigations to review due to ERO not properly designating the priority level on investigations. Therefore fifteen folders that were designated as Priority Level 1 but should have been Level 2 were reviewed. The ERO had a 73% compliance rate for closing Level 2 Priority investigations within 100 days.

*SBP Goal 2, Objective 1, Activity 1: "Initiate Rapid Response investigation within two business days from time of complaint/ event"*

- No rapid responses were initiated during the review period therefore the team could not measure whether they were initiated within the appropriate time.

*SBP Goal 2, Objective 1, Activity 1: "Investigation and its related Enforcement were completed within timeframes established by the SOPs"*

- A total of ten samples were reviewed. Of the ten, three instances were found in which the ERO failed to complete the investigation and its related enforcement within the allotted timeframe.
  - ECM #47079 – (L1 – Formal Case) Investigation Create Date is 07/06/10 and PLD Received Date is 05/20/11; a difference of 314 days
  - ECM #51971 – (L1 – Formal Case) Investigation Create Date is 11/22/10 and PLD Received Date is 06/30/11; a difference of 218 days
  - ECM #47787 – (L1 – Formal Case) Investigation Create Date is 07/19/10 and PLD Received Date is 07/11/11; a difference of 352 days

*SOP Checklist, RO-2, Step 2: "PAS accurately reflects whether claim /investigation Priority Level (L1, L2) was properly identified"*

- A total of fifteen samples were reviewed. All fifteen instances were found to have the claim/investigation priority properly not properly identified.
  - ECM #52261, #64441, #105242, #51971, #62164, #65051, #348631, #52219, #64193, #71946, #73583, #64296, #65583, #66539, & #95336 – All appear to be L2 Investigations instead of L1.

*SOP Checklist, RO-2, Step 4.a: "For complaints deemed "terminated", the AMS entry is closed with an explanation in the notes file"*

- A total of five samples were reviewed. Of the five, there was only one instance found to have been closed without an explanation in the notes file.

- Folder 50540 – Does not include notes for why the folder was terminated.

*SOP Checklist, RO-2, Step 6: “Investigation Sub-process Module technical content is accurate and complete and investigative findings are supported with appropriate documents and evidence.”*

- A total of ten samples were reviewed. Of the ten, six instances were found in which the ERO failed to create an accurate and complete Sub-process Module with supporting documents and evidence.
  - ECM #89851 – Findings incomplete within poultry feed
  - ECM #61750 – Entity response is omitted
  - ECM #65369 – No module attached
  - ECM #51971, 52005, & 52003 – Date of Report incomplete and no supervisor comments in closing summary.

*SOP Checklist, RO-2, Step 7.a: “If a violation was found, did the assigned Agent fill out an Investigative Synopsis, place in the PAS folder, before submitting the folder to the Unit Supervisor?”*

- A total of ten samples were reviewed. Of the ten, nine instances were not applicable and one wasn’t compliant.
  - ECM #64838, agent did not complete the closing summary and date of report omitted.

*SOP Checklist, RO-2, Step 7.b: “If no violation was found, did the assigned Agent complete the Closing Summary in the Investigation Module, to report findings with documentation before closing the investigation folder in PAS?”*

- A total of ten samples were reviewed. Of the ten, four instances were found in which the ERO failed to complete the Closing Summary in the Investigation Module.
  - ECM #89851 – CW-3; Poultry feed incomplete
  - ECM #61750 – Closing summary and entity’s response incomplete
  - ECM #65369 – Closing summary and supervisor’s comments omitted.
  - ECM #52003 – Closing summary, date of the report, supervisor’s comments, agent’s name and date omitted.

*PAS Checklist, RO-2 #1: “Investigation data complete for Outcome tab and complete for Violation tab, if applicable?”*

- A total of ten samples were reviewed. Of the ten, six instances were found in which the ERO failed to complete the Outcome and/or Violation tab.
  - ECM #62164, #3374, #69781, #88448, #104105, #50340 – Either outcome and/or violation tab not complete

*PAS Checklist, RO-2 #2: “Species and Enforcement field complete?”*

- A total of ten samples were reviewed. Of the ten, seven instances were found in which the ERO failed to complete the Species and/or Enforcement field.
  - ECM #29255, #20328, #40284, #22831, #19032, #25249, and #20114 – species and enforcement fields not complete

*PAS Checklist, RO-2 #3: “Are Notes tab clear and easy to understand?”*

- A total of ten samples were reviewed. Of the ten, only one instance was found in which the ERO failed to create clear and easy to understand notes.
  - ECM #88448 – Opened by mistake, no note stating this and the folder wasn’t cancelled.

*PAS Checklist, RO-2 #4: “Is the file naming convention correct?”*

- A total of ten samples were reviewed. Of the ten, two instances were found in which the ERO failed to use the correct naming convention.
  - ECM# 3374 & 104105 – No documents in folders. 3374 indicate that a general module was conducted, but it’s not in the folder.

**Recommendations**

- Supervisors are not properly designating the appropriate priority level for Investigations. The definitions for the different priority levels are located in the SOP. There is definitely a discrepancy in the completion of these investigations because of incorrect priority designations. ERO only had L1 investigations for the third quarter which means that every investigation completed during this time were all high priority cases. Suggest management relook at the priority definitions or provide training in this area. Management may also want to relook at the criteria for completing L1 and L2 investigations to determine if the performance standard is too high or too low and adjust, if needed.
- There is also inconsistency completing the sub-process module related to the investigation. This was measured by agents who conduct investigations for their regions, so it seems that what is required in one region may not be a requirement in another region. There needs to be training across the agency on what’s considered complete and accurate.
- The review also revealed that there is missing data on the folder for the Investigation. The Outcome and Violations tab aren’t being completed by the agents consistently. Agents need to know that if no violations are found or sub-process module isn’t conducted, they still need to go to the Violations tab and/ or Outcome tab enter the “No Violations” and/or “No Module Conducted.

- Consider enhancing data validation in PAS that will require the agent to complete essential fields (e.g. Outcome, Species, Enforcement, etc.) prior to closing the folder.
- 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.
- The Regional Directors recommended that the date the Regional Director approves the NOV be used as the complete date when estimating the amount of time it takes to close the Investigation and its related Enforcement. The Deputy Administrator plans to take this into consideration for the next MAR. However, for this MAR the complete date of the Enforcement was used to calculate the time it took to close an investigation and its related Enforcement.

### **RO-3: Regulatory Activities**

The ERO was rated green in this area; several minor findings are reported for continuous improvements. The ERO results in this area were strong in SOP compliance and SBP Activity Performance but weak in PAS compliance.

<b>RATING</b>	<b>REVIEW AREA</b>	<b>SCORE</b>
<b>YELLOW</b>	RO-3: Regulatory Activities	88%

P&SP Management Accountability Review Form				
Section 1- Guidance				
<b>SOP</b>	RO-3 Regulatory Activities			
<b>SBP</b>	<b>Goal 1 - Increase level of compliance through preventive regulatory actions</b> <b>Objective 2 - Protect industry's financial interest</b> <b>Objective 3 - Protect Fair Business Practices (Competition/Trade)</b>			
Section 2 - Review Plan				
<b>Purpose of Review</b>	<input type="checkbox"/> Initial	<input checked="" type="checkbox"/> Periodic	Annually	<input type="checkbox"/> Follow-up
<b>Frequency</b>	Annually unless otherwise specified			
<b>Sampling Plan</b>	SBP(1-5): 100% Records inspection; SOP: Random sample			
<b>Validation</b>	SBP(1-4): Review folders and Sub Process Modules in PAS and compare to the BEAD risk rankings and random audit list			
Section 3 - Results				
		<b>Number Reviewed</b>	<b>Number Compliant</b>	<b>%</b>
<b>SOP Performance Objectives and Compliance</b>				
<b>SOP Checklist</b>		<b>30</b>	<b>28</b>	<b>93%</b>
<b>Average SOP Compliance</b>		93%		
<b>SBP Activity Performance Standard</b>				
(1) Completed 100% of two financial audits of top ten packers (1 beef/1 hog)		<b>NA</b>		
(2) Completed 100% of random sample of custodial/prompt pay/timely remittance audits at selected packers, auction markets and dealers		<b>NA</b>		
(3) Completed 100% of inspection of scales, weighing trolleys, and weighing practices of sample of packing plants with static scale system that purchase in excess of 1,000 head of livestock annually on a carcass-weight basis		<b>NA</b>		
(4) Completed 100% of randomly stratified (by buying stations, auction markets/poultry plants/poultry feed mills) and determine the rate of compliance		<b>NA</b>		
(5) Completed 100% monitoring of the fed cattle and hog markets each week		<b>NA</b>		
<b>Average SBP Compliance</b>				
<b>PAS Compliance (Checklist)</b>				
<b>PAS Checklist</b>		<b>30</b>	<b>25</b>	<b>83%</b>
<b>Average PAS Compliance</b>		83%		
Section 4 -Summary				
<b>Findings / Recommendations:</b>				
See write up.				
<b>Overall Rating:</b>	<b>YELLOW</b>			<b>88%</b>
<b>Persons interviewed:</b>				
<b>Reviewers:</b>	2011 MAR TEAM-Peter Jackson, Twala Samuels, Leslie Jordan, Michelle Caldwell, Patti Tolle, Ladondra Taylor, Steve Mason, Nancy Speer, Bart DiGiovanni, Chad Curry, and Will Arce		<b>Date:</b>	July 26th and 27th

## Findings

SBP Goal 1, Objective 2, Activity 1: "Completed 100% of insolvency audits of identified high risk packers, auction markets, and dealers (10 per region by 10/10)"

- Since the MAR was conducted before the fiscal year end, no review could be done for this area.

*SBP Goal 1, Objective 2, Activity 2 and 3: “Completed 100% of random sample of custodial/prompt pay/timely remittance audits to a 90% confidence level (by 10/10)”*

- Since the MAR was conducted before the fiscal year end, no review could be done for this area.

*SBP Goal 1, Objective 3, Activity 1: “Completed 100% of scale/weighing trolleys and weighing practices of every packing plant that purchase in excess of 1,000 head of livestock annually on a carcass-weight basis and determine the rate of compliance (by 10/10)”*

- Since the MAR was conducted before the fiscal year end, no review could be done for this area.

*SBP Goal 1, Objective 3, Activity 3: “Completed randomly stratified sample of scales and weighing inspection (dealers/auction markets/poultry plants/poultry feed mills) to a 90% level of confidence and determine the rate of compliance (by 10/10)”*

- Since the MAR was conducted before the fiscal year end, no review could be done for this area.

*SOP Checklist RO-3 Step 2: “Regulatory Activity Sub-process Module technical content is accurate and complete”*

- A total of ten samples were reviewed. Nine of ten instances were found to be compliant.
  - ECM # 51953 – Analysis of Buyer Payments not complete with buyer names, etc.

*SOP Checklist RO-3 Step 4: “Did the assigned Agent complete the Exit Conference and Findings tab and denote any recommendations in the Regulatory Sub-process Module before submitting the folder to the Unit Supervisor?”*

- A total of ten samples were reviewed. All ten instances were found in which the ERO completed an Exit Conference and Findings tab before submitting the folder to the Unit Supervisor.

*SOP Checklist RO-3 Step 4.b: “If no violation is found, did the assigned Agent denote the findings in PAS and close the Regulatory Activity folder?”*

- A total of ten samples were reviewed. Nine of ten instances were found to be compliant.
  - ECM # 80622 – Violations entered were for a buyer and no the market agency folder.

*PAS Checklist RO-3 #1: “Completed Species tabs and Sub-process module included in documents”*

- A total of ten samples were reviewed. All ten instances was found in which the ERO completed the Species tab and a Sub-process Module included.

*PAS Checklist RO-3 #2: “Completed Close Reason and Outcome and if applicable, the Violation tab”*

- A total of ten samples were reviewed. Of the ten, three instances were found in which the ERO failed to complete the Close Reason and/or Outcome and when applicable, the Violation tab.
  - ECM #80622, #100680, #51953 – Either no data was entered on the violation tab or incorrect violation was entered.

*PAS Checklist RO-3 #2: “Is the file naming convention correct?”*

- A total of ten samples were reviewed. Of the ten, two instances were found in which the ERO failed to use the correct naming convention. Although eight were compliant, some of these eight instances used the incorrect format for the date.
  - ECM #65467 and #51953 – Incorrect entity name and incorrect date format was used.

**Recommendations**

- There seems to be a need for training on what data must be entered on the folder. A number of folders are missing an entry for violations. The agents are entering the violations on the note tab, but should enter the violation on the violations tab. There’s an option for No Violations, so it must be entered for data accuracy.
- 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.

**RO-4: Enforcement**

The ERO obtained a yellow rating; minor improvements are suggested. The ERO results in this area were strong for both PAS Compliance and SOP Performance Objectives.

RATING	REVIEW AREA	SCORE
YELLOW	RO-4: Enforcement	83%

P&SP Management Accountability Review Form				
Section 1- Guidance				
SOP	RO-4 Enforcement			
SBP	N/A			
Section 2 - Review Plan				
Purpose of Review	<input type="checkbox"/> Initial	<input checked="" type="checkbox"/> Periodic	Annually	<input type="checkbox"/> Follow-up
Frequency	Annually unless otherwise specified			
Sampling Plan	Random sampling and records review			
Validation	SOP(1): Review PAS for NOV documentation			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
(1) Send Notice of Violation with approval signature within one business day of receipt of task	10	10	100%	
(2) SOP Checklist	84	57	68%	
Average SOP Compliance	84%			
SBP Activity Performance Standard				
N/A				
Average SBP Compliance				
PAS Compliance (Checklist)				
PAS Checklist	40	33	83%	
Average PAS Compliance	83%			
Section 4 -Summary				
Findings / Recommendations:				
Overall Rating:	YELLOW		83%	
Persons interviewed:				
Reviewers:	2011 MAR TEAM-Peter Jackson, Twala Samuels, Leslie Jordan, Michelle Caldwell, Patti Tolle, Ladondra Taylor, Steve Mason, Nancy Speer, Bart DiGiovanni, Chad Curry, and Will Arce		Date:	July 26th and 27th

## Findings

SOP Performance Objective (1): “Send Notice of Violation with approval signature within one business day of receipt”

- A total of ten samples were reviewed. All ten instances were found to be compliant.

SOP Checklist #1 RO-4 Step 1: “All Enforcement activities completed within 20 days of approved investigative report”

- A total sample of 71 was reviewed. Of the 71, 24 instances were found in which the ERO failed to complete all enforcement activities within 20 days of approved investigative report
  - The list of 24 instances can be found in the supporting documents.

*PAS Checklist #1 RO-4: "If formal file, has the case file been added to the enforcement folder as one document before forwarding to Headquarters?"*

- A total of ten samples were reviewed. All ten instances were found to be compliant.

*PAS Checklist #2 RO-4: "If NOV Enforcement, does the folder contains actual NOV document?"*

- A total of ten samples were reviewed. All ten instances were found to be compliant.

*PAS Checklist #3 RO-4: "Is the document type correct?"*

- A total of ten samples were reviewed. All ten instances were found to be compliant.

*PAS Checklist #4 RO-4: "Has GIPSA (Supervisor or Regional Director) official signed the NOV document?"*

- A total of ten samples were reviewed. All ten instances were found to be compliant.

*PAS Checklist #5 RO-4: "Is the file naming convention correct?"*

- A total of ten samples were reviewed. Of the ten, seven instances were found in which the ERO failed to use the correct naming convention.
  - ECM # 70837, #70839, # 71884, #73749, #74687, #75066, #75074 – There was inconsistency of entity name used for document title and inconsistency with the format for date and naming of the document.

### **Recommendations**

- The SOP requires that all Enforcement activities be completed within 20 days of investigative report process. ERO completes Enforcement activities on average of 21 days. Maybe there needs to be an increase in the time allotted to complete Enforcements.
- 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. It seems that there's confusion of how to name documents related to entities with the same name but with various locations. These documents require that the name be used in conjunction with the location when titling these documents.

### **RO-5: Bond/Trust Claim**

The ERO obtained a green rating; minor improvements are suggested. The ERO results are strong in all areas. Although the ERO rated green, there's a need for

consistency on how all the regions handle bond/trust claims. No region conducts this activity consistently.

RATING	REVIEW AREA	SCORE
GREEN	RO-5: Bond/Trust Claims	100%

P&SP Management Accountability Review Form				
Section 1 - Guidance				
SOP	RO-5 Bond/Trust Claims			
SBP	Goal 2 - Attain compliance through investigation and enforcement Objective 1 - Expedite the timely completion of investigations			
Section 2 - Review Plan				
Purpose of Review	<input type="checkbox"/> Initial <input checked="" type="checkbox"/> Periodic	Annually	<input type="checkbox"/> Follow-up	
Frequency	Annually unless otherwise specified			
Sampling Plan	Random sampling and records review			
Validation	SBP(1) and SOP(1): Verify bond claim files in PAS			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
<b>SOP Performance Objectives and Compliance</b>				
(1) Send Certified Bond/Trust Letter with approval signature within ten business day of receipt to Surety or Trustee	2	2	100%	
(2) SOP Checklist	4	4	100%	
<b>Average SOP Compliance</b>		100%		
<b>SBP Activity Performance Standard</b>				
(1) 100% of Bond and trust claim forms are forwarded to known unpaid sellers within 10 business days.	2	2	100%	
<b>Average SBP Compliance</b>		100%		
<b>PAS Compliance (Checklist)</b>				
PAS Checklist	6	6	100%	
<b>Average PAS Compliance</b>		100%		
<b>Findings / Recommendations:</b>				
See write up.				
<b>Overall Rating:</b>	GREEN		100%	
<b>Persons interviewed:</b>				
<b>Reviewers:</b>	2011 MAR TEAM-Peter Jackson, Twala Samuels, Leslie Jordan, Michelle Caldwell, Patti Tolle, Ladondra Taylor, Steve Mason, Nancy Speer, Bart DiGiovanni, Chad Curry, and Will Arce		<b>Date:</b>	July 26th and 27th

## Findings

*SOP Performance Objective (1): "Send Certified Bond/Trust Letter with approval signature within one business day of receipt to Surety or Trustee"*

- A total of two samples were reviewed. All two instances were found in which the ERO sent the claims letter within 1 day.

*SBP Goal 2, Objective 1, Activity 1: "100% of Bond and trust claim forms are forwarded to unpaid sellers within 10 business days"*

- A total of two samples were reviewed. All two instances were in compliance with sending bond and trust claim form to unpaid sellers within 10 business days.

*SOP Checklist, RO-5 Step 4.a: “For claims received, did the PSU stamp the claim form with date of receipt?”*

- A total of two samples were reviewed. All two instances were found in which the ERO date stamp the claim with date of receipt.

*SOP Checklist, RO-5 Step 4.b: “The Claims Spreadsheet is updated to accurately reflect receipt of claims within appropriate timeframes (60, 30 or 15 days)”*

- A total of two samples were reviewed. All instances were found in which the ERO updated the Claims Spreadsheet to accurately reflect receipt of claims within the appropriate timeframes.

*PAS Checklist #1: “For bond claims, was claim analysis attached?”*

- A total of two samples were reviewed. All instances were found in which the ERO attached the claim analysis.

*PAS Checklist #2: “Was starting and primary factor identified?”*

- A total of two samples were reviewed. All instances were found in which the ERO identified the starting and primary factor.

*PAS Checklist #3: “Is the file naming convention correct?”*

- A total of two samples were reviewed. All two instances were found in which the ERO used the correct naming convention.

### **Recommendations**

- There needs to be consistency on how bond claims are entered in the system across regions and each incident. No two folders are alike. Some guidelines on how to conduct bond claims will help with being able to properly assess how the process is performed.
- Until this process can be included in PAS, 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.
- Clarify with employees, the correct manner in which bond claims should be entered into PAS, to avoid incorrect data entry. Either claim should be entered as an Investigation by the registrant the claim is against or the claimants.

## RO-6: Financial Instrument Termination / Expiration

The ERO obtained a green rating in this area minor material weaknesses were found in overall compliance.

RATING	REVIEW AREA	SCORE
GREEN	RO-6: Financial Instrument Termination / Expiration	95%

The lack of attention and necessary corrective action in this area could cause potential harm to the industry in which P&SP is charged to protect.

P&SP Management Accountability Review Form				
Section 1 - Guidance				
SOP	RO-6 Financial Instrument Termination / Expiration			
SBP	N/A			
Section 2 - Review Plan				
Purpose of Review	<input type="checkbox"/> Initial	<input checked="" type="checkbox"/> Periodic	Annually	<input type="checkbox"/> Follow-up
Frequency	Annually unless otherwise specified			
Sampling Plan	100% Record inspection			
Validation	SBP(1): Review PAS			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
(1) Paperwork sent to entity within 5 business days of receipt for corrections	4	4	100%	
(2) SOP Checklist	20	18	90%	
Average SOP Compliance	95%			
SBP Activity Performance Standard				
N/A				
Average SBP Compliance				
PAS Compliance (Checklist)				
PAS Checklist	40	38	95%	
Average PAS Compliance	95%			
Section 4 - Summary				
Findings / Recommendations:				
Overall Rating:	GREEN		95%	
Persons interviewed:				
Reviewers:	2011 MAR TEAM-Peter Jackson, Twala Samuels, Leslie Jordan, Michelle Caldwell, Patti Tolle, Ladondra Taylor, Steve Mason, Nancy Speer, Bart DiGiovanni, Chad Curry, and Will Arce		Date:	July 26th and 27th

### Findings

SOP Performance Objective (1): "Paperwork sent to entity within 5 business days of receipt for corrections"

- A total of four samples were reviewed. All four instances were found to be compliant.

SOP Checklist RO-6 Step 1: "For Bond/TA/TFA, did the PSU enter the termination date in PAS?"

- A total of ten samples were reviewed. Of the ten, two instances were found in which the ERO failed to enter the termination date in PAS.
  - ECM #76990, #77439 – Termination date not entered in PAS

*SOP Checklist RO-6 Step 2: “Does certified letters for financial instrument termination/expiration include Statement of Operations with PSU AO/ and/or Assistant AO signature?”*

- A total of ten samples were reviewed. All ten instances were found to be compliant.

*PAS RO-6 Checklist #1: “Financial instrument type was properly identified in ECM?”*

- A total of ten samples were reviewed. All ten instances were found in which the ERO identified the financial instrument type in ECM.

*PAS RO-6 Checklist #2: “Financial instrument amount entered in ECM?”*

- A total of ten samples were reviewed. For all ten instances, the ERO failed to enter the financial instrument amount in ECM.
  - ECM #40139, #25622, #31880, #33437, #42531, #34625, #34641, #34813, #40035, and #40064) - financial instrument amount not entered into ECM

*PAS RO6 Checklist #3: “Financial instrument termination date was properly entered in ECM?”*

- A total of ten samples were reviewed. All ten instances were found in which the ERO properly entered the Financial Instrument termination date.

*PAS RO6 Checklist #4: “Is the file naming convention correct?”*

- A total of ten samples were reviewed. Of the ten, two instances were found in which the ERO failed to use the correct naming convention.
  - ECM#79589 and #80980 – Incorrect date format was used and inconsistent use of entity name when naming of the files.

### **Recommendations**

- 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 has been populated. If not, PAS will prompt the user to complete prior to closing the folder.
- 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.
- 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.

## RO-7: Scale Test Reports

The ERO obtained a yellow rating which requires immediate attention in this area since material weaknesses were found in PAS Performance Objectives. The ERO scored well in SOP Compliance.

RATING	REVIEW AREA	SCORE
YELLOW	RO-7: Scale Test Reports	84%

The lack of attention and necessary corrective action in this area could cause potential harm to the industry in which P&SP is charged to protect.

P&SP Management Accountability Review Form				
Section 1 - Guidance				
<b>SOP</b>	<b>RO-7 Scale Test Report</b>			
<b>SBP</b>	<b>Goal 1 - Increase level of compliance through preventive regulatory actions</b> <b>Objective 3 - Protect Fair Business Practices (Competition/Trade)</b>			
Section 2 - Review Plan				
<b>Purpose of Review</b>	<input type="checkbox"/> Initial	<input checked="" type="checkbox"/> Periodic	<input type="checkbox"/> Annually	<input type="checkbox"/> Follow-up
<b>Frequency</b>	Annually unless otherwise specified			
<b>Sampling Plan</b>	Random sample			
<b>Validation</b>	Review and verify Scale Test records in PAS			
Section 3 - Results				
	<b>Number Reviewed</b>	<b>Number Compliant</b>	<b>%</b>	<b>Numerical Score</b>
<b>SOP Performance Objectives and Compliance</b>				
(1) Send Notification of Default (SW2) with approval signature within ten business day of discovering report is late	10	10	100%	
(2) BPU initiated Enforcement folder to issue Notification of Violation (SW3) after determining report inaccurate	2	2	100%	
(3) Enter test date in PAS within ten business days of receipt	10	9	90%	
(4) SOP Checklist	25	20	80%	
<b>Average SOP Compliance</b>		93%		
<b>SBP Activity Performance Standard</b>				
There are no Regional Office level Strategic Business Plan performance measures to be reviewed at this time				
<b>Average SBP Compliance</b>				
<b>PAS Compliance (Checklist)</b>				
PAS Checklist	20	15	75%	
<b>Average PAS Compliance</b>		75%		
Section 4 - Summary				
<b>Findings / Recommendations:</b>				
<b>Overall Rating:</b>	YELLOW		84%	
<b>Persons interviewed:</b>				
<b>Reviewers:</b>	2011 MAR TEAM-Peter Jackson, Twala Samuels, Leslie Jordan, Michelle Caldwell, Patti Tolle, Ladondra Taylor, Steve Mason, Nancy Speer, Bart DiGiovanni, Chad Curry, and Will Arce		<b>Date:</b>	July 26th and 27th

### Findings

SOP Performance Objective (1): "Send Notification of Default (SW2) with approval signature within ten business days of discovering the report is late"

- A total of twenty-five samples were reviewed. Only ten instances are applicable to the review and found to be compliant. There were 15 instances not applicable to the question.

*SOP Performance Objective (2): “If inaccurate, send Notification of Violation (SW3) with approval signature through Enforcement process”*

- A total of five samples were reviewed. Of the five, three instances were found where an SW3 wasn’t sent for Enforcement.
  - Scale Serial #s 01027, 5439073-5GF, and 742M had inaccurate test results. A note was entered in AMS for each stating that the scale was either being repaired or not in use.

*SOP Performance Objective #3: “Enter test date in PAS within ten business days of receipt”*

- A total of ten samples were reviewed. Of the ten, one report was not provided and could not determine if data was entered within ten business days.
  - Scale Serial #5794162 – Copy of scale test wasn’t provided.

*SOP Checklist R07 Step 1: “Scales subject to P&SP jurisdiction require test and reporting at least at least once from Jan.-June and once from July-Nov - check all dates in sample for compliance”*

- A total of ten samples were reviewed. Of the ten, one report was not provided and found in which the ERO failed to receive the test report.
  - Scale Serial #5794162 – Copy of scale test wasn’t provided.

*SOP Checklist R07 Step 5: “Did the BPU review the report to determine accuracy within 10 business days of receipt?”*

- A total of ten samples were reviewed. Of the ten, one report was not provided and accuracy couldn’t be determined.
  - Scale Serial #5794162 – Copy of scale test wasn’t provided.

*PAS Checklist R07 #1: “Data accurately entered into AMS (Scale Serial Number, Type, and Status)?”*

- A total of ten samples were reviewed. Of the ten, one report was not provided and four instances were found in which ERO failed to accurately enter data into AMS (Scale Serial Number, Type, Status).
  - Scale Serial #s 2152, 056055, 681736, and 0800320 – Either had a difference in make and/or model from the hard copy provided. There was no note indicating why.

*PAS Checklist R07 #2: “Is the scale test report on file for entity?”*

- A total of ten samples were reviewed. Of the ten, one instance was found in which ERO failed to have the scale test report on file for entity.
  - Scale Serial #5794162 – Copy of scale test wasn’t provided.

## ***Recommendations***

- There's a big improvement from last year's review score and this year's score. In the future, this process will be tracked in PAS. Therefore, data will be retrieved easily from the data warehouse.
- It seems that if a scale test is deemed inaccurate, an NOV isn't necessarily issued. There needs to be consistency on why an NOV isn't issued for inaccurate test.

### Attachment 1: Review Form

<b>Section 1. Guidance</b>	Strategic Business Plan (SBP) Objective Guidance and Direction (2010-2011) dated September 7, 2010	Enter the SBP number and description.
	Standard Operating Procedure (SOP)	Enter the SOP number, title, and process step number, if appropriate.
<b>Section 2. Review Plan</b>	Purpose of Review	Initial, Periodic (Annual, Quarterly, Monthly) or Follow-up
	Frequency	Recommend starting with long frequency (annual) then reduce if review results warrant.
	Sampling Plan	Either 100% inspection or draw random sample of total instances. Describe sampling method (example: selected every third case opened during the performance period)
	Validation	Describe the method or procedure used to validate answers provided during the review (examples: records review, PSAS data, or other data collection system).
<b>Section 3. Results</b>	SOP Performance Objectives	Document the number of instances reviewed and number and percent compliant.
	SOP Checklist	Apply checklist to each instance reviewed. Calculate % compliant (total "Y"s divided by total number reviewed)
	SBP Activity Performance Standard	Document the number of instances reviewed and number and percent compliant.
	PSAS Checklist	Use the same method as SOP checklist.
<b>Section 4. Summary</b>	Findings	Summarize results of checklist and Performance Standard comments should include: description of any non-compliant findings; explanation of risk, if corrective action is not taken; and a firm, realistic date for completing corrective actions and re-evaluation, if necessary.  Justify rating by relating discrepancies to SBP objective, performance standards, and any relevant verbiage from SOP.  Discuss findings with RO for feedback.
	Recommendations	Every finding should include a recommendation for corrective action.
	Rating	<b><i>Discovery of any Material Weakness can be grounds for Failure.</i></b> For purposes of this review, a material weakness is defined as "A serious reportable condition in which the design or operation of one or more of the internal control structure elements (including management controls) does not reduce to a relatively low level the risk that errors or irregularities, in amounts that would be material in relation to the financial statements or schedules, would not be prevented or detected."

## Attachment 2: Checklists

Standardized Operating Procedures (SOP)					
RO-1 Step 2.a	If new registrant, did the PSU staff send the Standard Packet and include POC information?	6	3	1	No letter requesting bond
RO-1 Step 2.b	If amended, supplemental, re-registration, or limited, did the PSU staff send appropriate paperwork to the entity within five business days of receipt to collect the necessary information?	9	1		No amended registration letter
RO-1 Step 4.a	If paperwork is correct, did the PSU staff input information into PAS? Is documentation available showing appropriate letter was sent?	9	1		Packer buyer not marked
		<b>24</b>	<b>5</b>	<b>1</b>	
RO-2 Step 2	Reflects whether investigation Priority Level (R2, L1, L2) was properly identified		15		Some of these may include system generated folders that are also being designated with the incorrect priority level.
RO-2 Step 4.a	For complaints deemed "terminated", the folder entry is closed with an explanation in the notes file	4	1		No notes on why terminated
RO-2 Step 6	Investigation Subprocess Module technical content is accurate and complete and investigative findings are supported with appropriate documents and evidence.	4	6		No closing summary; no module attached; no entity response
RO-2 Step 7.a	If a violation was found, did the assigned Agent complete an Investigative Synopsis and place in the PAS folder?		1	9	No closing summary and date of report omitted
RO-2 Step 7.b	If no violation was found, did the assigned Agent complete the Closing Summary in the Investigation Module, to report findings with documentation before closing the investigation folder in PAS?	6	4		Incomplete closing summary
		<b>14</b>	<b>27</b>	<b>9</b>	
RO-3 Step 2	Regulatory Activity Subprocess Module technical content is accurate and complete	9	1		Analysis of Buyer payments not complete w/buyer names, etc.
RO-3 Step 4	Did the assigned Agent complete the Exit Conference and Findings tab and denote any recommendations in the Regulatory Subprocess Module before submitting the folder to the Unit Supervisor?	10	0		
RO-3 Step 4.b	If no violation is found, did the assigned Agent denote the findings in PSAS and close the Regulatory Activity folder?	9	1		Violations were noted; violations is of a buyer but in market folder
		<b>28</b>	<b>2</b>	<b>0</b>	
RO-4 Step 1.a.5	Enforcement activity completed within 20 days?	47	27		
RO-4 Step 1.b	If formal file, has the case file been added to the enforcement folder as one document before forwarding to Headquarters?	10			
		<b>57</b>	<b>27</b>	<b>0</b>	
RO-5 Step 4.a	For claims received, did the PSU stamp the claim form with date of receipt?	2			
RO-5 step 4.b	For claims not received, did the PSU update the Claims Spreadsheet to accurately reflect receipt of claims within appropriate time frames (60, 30 or 15 days)?	2			
		<b>4</b>	<b>0</b>	<b>0</b>	
RO-6 Step 1	For Bond/TA/TFA, did the PSU enter the termination date in PAS (30 days after date notice was received in office or later date if specified in notice)?	8	2		No Term
RO-6 Step 2	Does certified letters for financial instrument termination/expiration include Statement of Operations with PSU AO and/or Assistant AO signature?	7		3	
		<b>15</b>	<b>2</b>	<b>3</b>	
RO-7 Step 1	Scales subject to P&SP jurisdiction require test and reporting at least once from Jan.-June	9	1		No Hard Copy on file
RO-7 Step 5	Did the BPU review the report to determine accuracy within 10 business days of receipt?	9	1		No Hard Copy on file
RO-7 Step 5.b	If inaccurate, was an SW3 letter (NOV) sent through Enforcement folder?	2	3		
		<b>20</b>	<b>5</b>	<b>0</b>	

Packers and Stockyard Automated System (PAS)					
		Y	N	N/A	Comments
RO-1	Business entity and Address tab completed in AMS	10	0		minor misspelling issue
RO-1	If market agency, dealer, or packer with volume over \$500,000, is financial instrument tab complete?	10	0		
RO-1 Step 3.a	Entity paperwork included in ECM folder	9	1		No trustee resp. letter
RO-1	Is the file naming convention correct?	6	4		DBA name not used;incorrect format
		<b>35</b>	<b>5</b>	<b>0</b>	
RO-2	Investigation data complete for Outcome tab (location, review date, close reason)?	7	3		Missing either review date or location or both
RO-2	Is the Violation tab complete?	6	4		Agents missing violations;Should select NO Violation if there are none for the Violation tab.
RO-2	Species and Enforcement field complete?	10			
RO-2	Are Notes tab clear and easy to understand?	9	1		
RO-2	Is the file naming convention correct?	8	2		Formatting incorrect for date
		<b>40</b>	<b>10</b>	<b>0</b>	
RO-3	Completed Species and Enforcement tabs, Subprocess module included in documents tab	10	0		
RO-3	Completed Outcome and Violation tabs - if applicable	7	3		Violation incorrectly applied;Violation tab blank
RO-3	Is the file naming convention correct?	8	2		Module named incorrectly
		<b>25</b>	<b>5</b>	<b>0</b>	
RO-4	If NOV Enforcement, does the folder contains actual NOV document?	10			No signed PDF in folder
RO-4	Is the document type, certified # and date of violation correct for the NOV?	10			Final copy of NOV not in folder
RO-4	Has GIPSA (Supervisor or Regional Director) official signed the NOV document?	10			No signed PDF in folder
RO-4	Is the file naming convention correct?	3	7		Incorrect name used
		<b>33</b>	<b>7</b>	<b>0</b>	
RO-5	For bond claims, was claim analysis added to PAS folder?	2			
RO-5	Was starting and primary factor identified?	2			
RO-5	Is the file naming convention correct?	2			
		<b>6</b>	<b>0</b>	<b>0</b>	
RO-6	Financial instrument type was properly identified in ECM?	10			
RO-6	Financial instrument amount entered in ECM?	10			
RO-6	Financial instrument termination date was properly entered in ECM?	10			
RO-6	Is the file naming convention correct?	8	2		Incorrect date format used and inconsistent naming of files
		<b>38</b>	<b>2</b>	<b>0</b>	
RO-7	Data accurately entered into AMS (Scale Serial Number, Type, Status)?	5	4	1	Scale model and make differs; no note indicating why
RO-7	Is the scale test report on file for entity?	9	1		No hard copy available
		<b>14</b>	<b>5</b>	<b>1</b>	

***Attachment 3:*** Supporting Documents