

Management Accountability Review

Policy and Litigation Division

July 26th – 28th, 2011



Areas Reviewed:

Standard Operating Procedures
Strategic Business Plan
Packers & Stockyards Automated System/Change Control Working Group

Executive Summary

The Packers and Stockyards Program (P&SP) Management Assessment Review Team (MART) conducted a Management Accountability Review (MAR) on July 26th – 28th, 2011, the remaining review and assessment was conducted by MART leader Regina Ware, Peter Jackson, and Tyhisa Luckey August 1 through 26th, 2011 of the following Policy and Litigation Division (PLD) operational areas:

1. Standard Operating Procedures (SOP)
2. Strategic Business Plan (SBP) objectives
3. Packers & Stockyards Automated System (PAS) / Change Control Working Group (CCWG)

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/CCWG that were identified as part of this MAR.

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 PLD that require attention or improvement. The following table depicts the PLD 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
RED	PLD-1: PLD/OGC Enforcement	66%
RED	PLD-2: Posting / Deposting	50%
GREEN	PLD-3: Form Changes	100%
	BEAD/PLD-4: Official Correspondence	
	PLD-5: Policy	
GREEN	PLD-6: Notice of Enforcement Actions	90%
GREEN	PLD-7: Regulations	100%
GREEN	PLD-8: Reparations	94%
GREEN	PLD-9: Web Content Administration	92%

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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 and other sources 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 Policy and Litigation Division (PLD). 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 1st through June 30th 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 PLD'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 PLD 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

PLD-1: PLD/OGC-1 Enforcement

The PLD results in this area were weakest in the SOP Performance Objectives.

RATING	REVIEW AREA	SCORE
RED	PLD/OGC-1: Enforcement	66%

P&SP Management Accountability Review Form

Section 1- Guidance				
SOP	PLD-1 Enforcement			
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	100% SOP			
Validation	(1) Verify dates the cases were assigned to PLD staff through PAS (2) Review 100% of the cases submitted to identify which were offered stipulation, then compare date of stipulation agreement to the date the letter was delivered by US Post Office (3) Review 100% of the cases that were referred to OGC; verify the date of the transmittal letter as date signed and PAS to verify when case file was submitted (4) Review quarterly reports to validate tracking of investigation timeframes			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
(1) PLD Director or designee assigns case to PLD staff within three business days of receipt	90	71	79%	
(2) If the case is suitable for stipulation, PLD staff prepares a stipulation letter within five business days.	18	15	83%	
(3) PLD staff assistant sends stipulation letter with approval signature within three business days of receipt.	22	21	95%	
(4) For enforcement, PLD staff prepares the case file and attaches transmittal letter within five business days for OGC review.	49	30	61%	
(5) For enforcement, PLD Director approves document and sends to OGC within three business days of receipt.	50	19	38%	
(6) If the Respondent accepts stipulation, the designated PLD liaison will submit payment to GIPSA lockbox and related paperwork to APHIS within one business day of receipt	7	4	57%	
(7) If PLD has comments on draft complaint, it will be returned to OGC with corrections and updates within three business days after initial receipt	4	1	25%	
(8) If PLD has no comments on draft complaint, PLD will inform the attorney assigned to the case within two business days after initial receipt	3	1	33%	
(9) PLD staff assistant will make the appropriate number of hard copies of the approved complaint and file at Hearing Clerk Office within one business day after receipt of signed copy from Deputy Administrator	7	1	14%	
(10) SOP Checklist	67	60	90%	
Average SOP Compliance		58%		
SBP Activity Performance Standard				
Measure quarterly the average time to conduct an investigation and resolve the case through an internal P&SP resolution or through a formal administrative or civil action	40	18	45%	Average days in PLD is 98 days
Average SBP Compliance		45%		
PAS / CCWG Compliance (Checklist)				
PAS / CCWG Checklist	51	49	96%	
Average PAS / CCWG (Checklist)		96%		
Section 4 - Summary				
Findings / Recommendations:				
See report.				
Overall Rating:	RED		66%	
Persons interviewed:				
Reviewers:	Regina Ware, Tyhisa Luckey, Peter Jackson		Date:	8/1/2011-8/31/2011

Findings

SOP Performance Objective (1): "PLD Director or designee assigns case to PLD staff within three business days of receipt."

- Of the 90 instances reviewed, 19 instances were found in which the PLD Director failed to assign case to PLD staff within three business days of the receipt. See PLD/OGC-1 supporting documentation for details.

SOP Performance Objective (2): "If the case is suitable for stipulation, PLD staff prepares a stipulation letter within five business days."

- Of the 18 instances reviewed, 3 instances were found in which PLD staff failed to prepare a stipulation letter within five business days.
 - ECM # 56813, 65602, and 74994 - PLD staff failed to prepare stipulation letter within the allotted timeframe.

SOP Performance Objective (3): "PLD staff assistant sends stipulation letter with approval signature within three business days of receipt."

- Of the 23 instances reviewed, one instance was found in which the PLD staff assistant did not send the approved stipulation letter within the allotted timeframe.
 - ECM # 63181 – PLD staff assistant failed to mail stipulation without the allotted timeframe.

SOP Performance Objective (4): "For enforcement, PLD staff prepares the case file and attaches transmittal letter within five business days for OGC review."

- Of the 49 instances reviewed, 19 instances were found in which the PLD staff did not prepare the case file and attach the transmittal letter within the allotted timeframe. See PLD/OGC-1 supporting documentation for details.

SOP Performance Objective (5): "For enforcement, PLD Director approves document and sends to OGC within three business days of receipt."

- Of the 50 instances reviewed, 31 instances were found in which the PLD Director did not approve document and send to OGC within the allotted timeframe.
 - See PLD/OGC-1 supporting documentation for details. Due date (five days) in PAS differs from SOP due date (three days). If we use the 5 day timeframe, then there were only 23 instances that failed to meet the allotted timeframe.

SOP Performance Objective (6): "If the Respondent accepts stipulation, the designated PLD liaison will submit payment to GIPSA lockbox and related paperwork to APHIS within one business day of receipt."

- Of the 10 instances reviewed, 3 instances were found in which the designated PLD liaison did not submit payment to GIPSA lockbox and

related paperwork to AHIS within the allotted timeframe. And three instances were deemed not applicable.

- ECM #47459, #65603, and # 64545 – failed to meet the allotted timeframe.

SOP Performance Objective (7): “If PLD has comments on draft complaint, it will be returned to OGC with corrections and updates within three business days after initial receipt.”

- Of the four instances reviewed, three instances were found in which the PLD failed to return comments to OGC with corrections and updates within the allotted timeframe.
 - ECM #26606, #26760, and #26768 – failed to meet the allotted timeframe. However, task due date in PAS ranges from three to five days which differs from SOP required timeframe.

SOP Performance Objective (8): “If PLD has no comments on draft complaint, PLD will inform the attorney assigned to the case within two business days after initial receipt.”

- Of the 3 instances reviewed, 3 instances were found in which the PLD failed to inform the attorney assigned to the case of no comments on draft complaint within the allotted timeframe.
 - ECM # 26329, #29439, and #40255 – failed to meet the allotted timeframe. However, task due date in PAS ranges from two to five days which differs from SOP required timeframe.

SOP Performance Objective (9): “PLD staff assistant will make the appropriate number of hard copies of the approved complaint and file at Hearing Clerk Office within one business day after receipt of signed copy from Deputy Administrator.”

- Of the 7 instances reviewed, 6 instances were found in which the PLD staff assistant failed meet the targeted timeframe.
 - ECM # 26329, #26606, #26760, #26768, #29439, and #34076 – failed to meet the one day timeframe. However, task due date in PAS ranges from three to five days which differs from SOP required timeframe.

SBP Activity Performance (1): “Measure quarterly the average time to conduct an investigation and resolve the case through an internal P&SP resolution or through a formal administrative or civil action.”

- Since a timeframe was not designated for PLD in the SOP, this activity was measured using the third quarter data from the PLD Closed case report. An analysis was conducted to determine the average time to close an investigation/case within PLD. Results revealed that the average time it takes PLD to complete an investigation/case is 98 days. This average consists of those cases that were resolved at the PLD level. See supporting documentation for details.

SOP Checklist Step 4.a: “For enforcement, does the folder contain the sanction summary?”

- Fifteen instances were reviewed. Of the fifteen, two instances were found to be non-compliant and nine instances were not applicable.
 - ECM # 29344 and #33367 – failed to contain the sanction summary.

SOP Checklist Step 4.d and 9.d: “If the decision is to not continue enforcement, PLD closes the enforcement folder and indicates reason in notes tab in ECM.”

- Of the 13 instances reviewed, all instances were found compliant in which the PLD closed the enforcement folder and completed notes in ECM.

SOP Checklist Step 6.a: “If the respondent accepts stipulation, did PLD record acceptance date, penalty, and sanction.”

- Ten instances were reviewed, one instance was found in which the PLD failed to record the acceptance date, penalty, and/or sanction for stipulation. And one instance wasn't applicable.
 - ECM #62353 – Stipulation acceptance date not entered.

SOP Checklist Step 7: “Was public press release of court settlement issued?”

- Ten instances were reviewed. Of the 10, one instance was found in which the PLD failed to issue public press release of court settlement issue.
 - ECM #47459 – Since the folder wasn't closed properly; the folder does not identify a press release task.

SOP Checklist Step 15: “All relevant documents (i.e. docket complaint consent decision, order, etc) scanned and uploaded to folder.”

- Of the 25 instances reviewed, three instances were found in which the PLD failed to scan and upload all relevant documents to folder.
 - ECM #26768, #34715, and #41117 – failed to have all relevant documents in the folder.

PAS / CCWG Checklist #2 Step 6.a/ 22 & 23.b: “If stipulation or enforcement was sanction tab completed?”

- Of the 10 instances reviewed, all instances were found to be compliant. Some didn't include information in the description field.

PAS / CCWG Checklist #3 Step 8: “Was type of case identified in OGC tab?”

- Of the ten instances reviewed, nine instances were found in which the PLD failed to identify the type of case in OGC tab.
 - ECM #26341, #65603, #53336, #49094, #62067, #48934, #62353, #47459, and #39938 – did not identify case type in the OGC tab.

PAS / CCWG Checklist #4: "Notes tab completed and up to-date?"

- Of the six instances reviewed, all were found in which the PLD completed the notes tab.
 - Some notes are mixed with details about the case and then some include details about the work the user working the task is doing. Maybe some guidelines need to be established about notes added to the folder.

PAS / CCWG Checklist #5: "All tabs completed, all documents scanned (i.e. Case file, Transmittal, Compliant)"

- Of the 25 instances reviewed, six were found in compliance in which PLD completed all tabs and scanned all documents (case file, transmittal, compliant). There were 19 instances not applicable.

Recommendations

- There are several instances where the task due date in PAS differs from the established timeframe in the SOP; specifically performance objectives that require either two or three business days. Suggest determine which date is the more realistic due date and update the SOP and/or PAS as necessary.
- The PLD SOP should be updated with changes such as criteria for the length of time a case should be in PLD and determine which fields PLD will be responsible for entering.

PLD-2: Posting / Deposting

PLD was rated yellow in this area; minor findings are reported for continuous improvements.

RATING	REVIEW AREA	SCORE
RED	PLD-2: Posting / Deposting	50%

P&SP Management Accountability Review Form				
Section 1- Guidance				
SOP	PLD-2 Posting / Depositing Stockyards			
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%			
Validation	Verify posting / depositing notices through PAS			
Section 3 - Checklist Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
SOP Checklist	40	20	50%	
Average SOP Compliance		50%		
SBP Activity Performance Standard				
N/A				
Average SBP Compliance				
PAS / CCWG Compliance (Checklist)				
N/A				
Average PAS / CCWG (Checklist)				
Section 4 - Summary				
Findings / Recommendations:				
See report.				
Overall Rating:	RED		50%	
Persons interviewed:				
Reviewers:	Regina Ware, Tyhisa Luckey, Peter Jackson		Date:	8/1/2011-8/31/2011

Findings

SOP Checklist #1 Step 2.a.1: “Is PAS updated after Posting Number is assigned?”

- Eight instances were reviewed and all instances were found in which PAS wasn’t updated with the posting number. Currently, there is no workflow for posting and de-posting in ECM; therefore, this activity is being tracked outside of PAS. Using the data provided, it seems as if the posting number isn’t being updated in the system.

SOP Checklist #2 Step 4: “Was CD or hard copy provided to MBS for clearance, signature, and FR submission?”

- Eight instances were reviewed and all were compliant.

SOP Checklist #3 Step 5.b: “Were the posting sign and instructions mailed using traceable delivery?”

- Eight instances were reviewed where PLD provided posting sign to corresponding RO. This process has changed to provide posting sign to corresponding RO who is not responsible for forwarding the posting sign to the stockyard facility using traceable delivery.

SOP Checklist #4 Step 12: “Is PAS updated after deposing notice is published in the Federal Register?”

- Of the eight instances reviewed, no spreadsheet could be found where all were updated and tracked.
 - The team could not find the posting/deposting spreadsheet that tracked these changes on the PLD I: Drive. Since there is no workflow for posting and de-posting in ECM, it was difficult to verify the information.

SOP Checklist #5 Step 13: “Was letter and a copy of Federal Register Notice mailed to owner?”

- Of the eight instances reviewed, there were four instances in which PLD either failed to mail a copy of the FR notice to the owner or a copy wasn't provided.

Recommendations

- Since there isn't a workflow for posting and de-posting in ECM, the SOP should be updated to match the actual process used to handle the posting and deposting process. The information provided was hard to follow because the process is not tracked in a spreadsheet or other method. The MAR team could only use information provided by PLD for the review. So some items couldn't be verified although they could have been completed by the PLD staff.
- The spreadsheet used for tracking posting/deposting could not be located on the PLD I: Drive. In order to increase transparency, the MAR team recommends PLD use spreadsheets to track processes not in ECM. The tracking method should then be copied to an area accessible by all of PLD.

PLD-3: Form Changes

PLD was rated green in this area, minor improvements in the SOP Performance Objectives.

RATING	REVIEW AREA	SCORE
GREEN	PLD-3: Form Changes	100%

P&SP Management Accountability Review Form				
Section 1 - Guidance				
SOP	PLD-3 Form Changes			
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%			
Validation	Verify changes on I: drive			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
SOP Checklist	4	4	100%	
Average SOP Compliance		100%		10
SBP Activity Performance Standard				
N/A				
Average SBP Compliance				
PAS / CCWG Compliance (Checklist)				
N/A				
Average PAS / CCWG (Checklist)				
Section 4 - Summary				
Findings / Recommendations:				
See report.				
Overall Rating:	GREEN		100%	
Persons interviewed:				
Reviewers:	Regina Ware, Tyhisa Luckey, Peter Jackson		Date:	8/1/2011-8/31/2011

Findings

SOP Checklist #1 Step 4: "Was the required OMB package prepared and provided to MBS for clearance?"

- The two instances reviewed, PLD was found in compliance with preparing and providing the required OMB package to MBS for clearance.

SOP Checklist #2 Step 8: "Were the revised form(s) posted on the I: drive?"

- The two instances reviewed, PLD was found in compliance posting the revised form on the I: drive.

Recommendations

- Validated documentation (emails) provided to MBS for clearance; suggest establish a tracking mechanism when items are provided to MBS for clear traceability.

BEAD/PLD-4: Official Correspondence

This area was not reviewed by the MAR team due to changes in responsibilities concerning official correspondence. The GIPSA Chief of Staff position is now responsible for handled all official correspondence. PLD and BEAD are only asked to assist the Chief of Staff when necessary.

Recommendations

- The SOP needs to be removed or either updated to account for the changes in responsibility for official correspondence.

PLD-5: Policy

PLD did not have any policies issued during the review timeframe. Therefore no data was obtained and could not be analyzed for this portion of the MAR.

Recommendations

- There needs to be a central tracking sheet for this SOP. The CCWG workflow is used to track the work involved but there needs to be a spreadsheet that tracks various dates not captured by the CCWG workflow involving policies.

PLD-6: Enforcement Actions

PLD obtained a green in this area, minor improvements in SOP Performance Objectives.

RATING	REVIEW AREA	SCORE
GREEN	PLD-6: Enforcement Actions	90%

P&SP Management Accountability Review Form				
Section 1- Guidance				
SOP	PLD-6 Notice of Enforcement Actions			
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			
Validation	Randomly select enforcement actions to verify the process			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
SOP Checklist	20	18	90%	
Average SOP Compliance		90%		8
SBP Activity Performance Standard				
N/A				
Average SBP Compliance				
PAS / CCWG Compliance (Checklist)				
N/A				
Average PAS / CCWG (Checklist)				
Section 4 - Summary				
Findings / Recommendations:				
Overall Rating:	GREEN		90%	
Persons interviewed:				
Reviewers:	Regina Ware, Tyhisa Luckey, Peter Jackson		Date:	8/1/2011-8/31/2011

Findings

SOP Checklist # 1 Step 2: "PLD staff develops draft enforcement action within five business days?"

- Of the 15 instances reviewed, two instances were found in which the PLD failed to develop draft enforcement action within the allotted timeframe.
 - ECM #33365 and #43483 – press release was completed outside of allotted timeframe.

SOP Checklist # 2 Step 9: "PLD staff track the distribution of enforcement actions to identified media and industry outlets?"

- Of the 5 instances reviewed, all were found in which the PLD staff was in compliance with tracking the distribution of enforcement actions to identified media and industry outlets.
 - Five instances were reviewed from book 11 for Press Releases.

Recommendations

- This SOP may not be necessary because the PLD-OGC workflow tracks this area. If the SOP is needed, then the name needs to change. It's

confusing that there are two SOPs for PLD that are titled Enforcement, there needs to be a distinction between the two.

PLD-7: Regulations

Although PLD obtained a green in this area, there are various improvements needed in PAS compliance and SOP Performance Objectives.

RATING	REVIEW AREA	SCORE
GREEN	PLD-7: Regulations	100%

Findings

SBP Activity Performance (1): “Develop communications plan to announce and provide outreach on new final rules to coincide with the publishing of the final rule”

- Of the four folders reviewed, there wasn’t any communications plan included in the folder. These were all eliminated from the scoring due to the MAR failing to retrieve this information during the review.

SOP Checklist #1 Step 2: “PLD Director assigns folder to PLD staff to work”

- Due to the assignments being handled verbally, this information could not be verified for the four instances reviewed.

SOP Checklist #2 Step 2: “PLD staff sends final rule to MBS for clearance and FR publication?”

- Using the CCWG workflow and the Regulation workflow consisting of only one task, this information could not be verified for the four instances reviewed.

PAS/ CCWG Checklist #1 Step 3: “Folder updated as needed in notes tab”

- Of the four instances reviewed, all four were found in which PLD updated the notes tab in the folder.

PAS/ CCWG Checklist #1 Step 3: “PLD staff sends proposed rule to MBS for clearance and FR publication (documented in CCWG ECM Module or through email)?”

- Of the four instances reviewed, only one folder contained notes from MBS and three folders could not be verified for MBS clearance and FR publication.

Recommendations

- Tasks are assigned verbally; there is no tracking mechanism in place to track internal suspense date. Suggest establishing a mechanism to track assignments and clearly identify employee assigned to complete the tasks for traceability and accountability.
- The MAR team also suggests that PLD develop some internal work instructions for staff to use when working regulation folders in CCWG. Currently the folder only contains one task, but there needs to be task that tracks various milestones for this process.
- Maintain documentation when sending proposed rule to MBS for clearance and FR publication for traceability and clear audit trail.

PLD-8: Reparations

PLD obtained a green in this area, minor improvement in PAS Compliance.

RATING	REVIEW AREA	SCORE
GREEN	PLD-8: Reparations	94%

P&SP Management Accountability Review Form				
Section 1 - Guidance				
SOP	PLD-8 Reparations			
SBP	Goal 2 - Attain compliance through investigation and enforcement Objective 2 - Increase authority to take enforcement action within PSP			
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% Reparations received			
Validation	Cases reviewed: 1 case reviewed.			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
SOP Checklist	9	8	89%	
	Average SOP Compliance		89%	
SBP Activity Performance Standard				
There are no PLD Strategic Business Plan performance measures to be reviewed at this time				
	Average SBP Compliance			
PAS / CCWG Compliance (Checklist)				
PAS / CCWG Checklist	2	2	100%	
	Average PAS / CCWG (Checklist)		100%	
Section 4 - Summary				
Findings / Recommendations:				
Overall Rating:	GREEN		94%	
Persons interviewed:				
Reviewers:	Regina Ware, Tyhisa Luckey, Peter Jackson		Date:	8/1/2011-8/31/2011

Findings

SOP Checklist #1 Step 3: "PLD Director signature obtained on letter?"

- Of the 1 instance reviewed, PLD failed to obtain the director's signature.

SOP Checklist #2 Step 4.a: "If rebuttal is received, did PLD staff send copy to the other party involved?"

- Of the one instance reviewed, PLD was found to be compliant.

SOP Checklist #3 Step 4.b: "If rebuttal is not received, did PLD staff file the Reparation with the Hearing Clerk and receive a docket number?"

- Of the one instance reviewed, a rebuttal was received.

SOP Checklist #4 Step 5.a: "If parties accept written hearing, did PLD send letter to all parties involved?"

- Of the one instance reviewed, PLD was found to be compliant.

SOP Checklist #5 Step 8: “Did PLD send letter to parties for notification that additional time for submitting evidence has ended and the time period allowed to file a brief?”

- Of the one instance reviewed, PLD was found to be compliant.

SOP Checklist #6 Step 9: “For every order/decision, was a Legal Specialist referred for a draft?”

- Of the one instance reviewed, PLD was found to be compliant.

SOP Checklist #7 Step 9: “For every order/decision from the Legal Specialist, did PLD staff provide a copy to OGC for review?”

- Of the one instance reviewed, PLD was found to be compliant.

SOP Checklist #8 Step 11: “Was every order/decision filed with Hearing Clerk for JO approval and signature?”

- Of the one instance reviewed, PLD was found to be compliant.

SOP Checklist #9 Step 12.b: “For every order/decision not approved, did the PLD staff forward JO comments and/or corrections to the Legal Specialist?”

- Of the one instance reviewed, the order/decision was approved.

Recommendations

- A Reparations feature has been added PAS and should be used for any active reparation cases. It seems that tracking information isn't being done in the folders. For this review, the MAR had to use a completed 2010 case.
- PLD should review the SOP for Reparations and update it based on what's in PAS.

PLD-9: Web Content Administration

PLD obtained a green rating; minor improvements in SOP Performance Objectives.

RATING	REVIEW AREA	SCORE
GREEN	PLD-9: Web Content Administration	92%

P&SP Management Accountability Review Form				
Section 1- Guidance				
SOP	PLD-9 Web Content Administration			
SBP	N/A			
Section 2 - Review Plan				
Purpose of Review	<input type="checkbox"/> Initial	<input checked="" type="checkbox"/> Periodic	<input type="checkbox"/> Annually	<input type="checkbox"/> Follow-up
Frequency	Annually unless otherwise specified			
Sampling Plan	100%			
Validation	Review PAS for inquiry responses			
Section 3 - Results				
	Number Reviewed	Number Compliant	%	Numerical Score
SOP Performance Objectives and Compliance				
(1) 100% of inquiries addressed and responded to within 10 business days of receipt	3	2	67%	
(2) SOP Checklist	3	3	100%	
Average SOP Compliance	83%			
SBP Activity Performance Standard				
N/A				
Average SBP Compliance				
PAS / CCWG Compliance (Checklist)				
PAS/ CCWG Checklist	3	3	100%	
Average PAS / CCWG (Checklist)	100%			
Section 4 -Summary				
Findings / Recommendations:				
Overall Rating:	GREEN		92%	
Persons interviewed:				
Reviewers:	Regina Ware, Tyhisa Luckey, Peter Jackson		Date:	8/1/2011-8/31/2011

Findings

SOP Performance Objective (1): "100% of inquiries addressed and responded to within 10 business days of receipt"

- Of the three instances reviewed, one instance was found in which the PLD failed to respond to an inquiry within the allotted timeframe.

SOP Checklist #1 Step 4: "Change Request submitted to webmaster?"

- Of the three instances reviewed, all instances were found in which the PLD is in compliance with submitting change request to the webmaster.

PAS/ CCWG Checklist #1 Step 2.b: "PLD submitted Change Request to CCWG?"

- Three instances were reviewed and all three instances were not applicable for CCWG review.

Recommendations

- No recommendations.

Attachment 1: Review Form

Section 1. Guidance	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.
Section 2. Review Plan	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, other data collection system).
	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 / Change Control Working Group (CCWG) Checklist	Use the same method as SOP checklist.
Section 4. Summary	Findings	<p>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.</p> <p>Justify rating by relating discrepancies to SBP objective and performance standards, and any relevant verbiage from SOP.</p> <p>Discuss findings with PLD for feedback.</p>
	Recommendations	Every finding should include a recommendation for corrective action.
	Rating	Discovery of any Material Weakness can be grounds for Failure. 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

P&SP Management Accountability Review Form Supplemental Checklist					
Standard Operating Procedures (SOP)					
		Y	N	N/A	Comments
PLD-1 Step 4.a	Does the folder contain the sanction summary?	4	2	9	
PLD-1 Step 6.a	If the respondent accepts stipulation, did PLD record acceptance date, penalty, and sanction?	8	1	1	
PLD-1 Step 7	Was public press release of court settlement issued?	9	1		
PLD-1 Step 9.d	If the decision is to not continue enforcement, PLD closes the enforcement folder and indicates reason in notes tab in ECM.	7			
PLD-1 Step 15	All relevant documents (i.e. docket complaint consent decision, order, etc) scanned and uploaded to folder.	5	3	17	
		33	7	27	
PLD-2 Step 2.a.1	Is PAS updated after Posting Number is assigned?		8		
PLD-2 Step 4	Was CD or hard copy provided to MBS for clearance, signature, and FR submission?	8			
PLD-2 Step 5.b	Were the posting sign and instructions mailed using traceable delivery?	8			
PLD-2 Step 12	Is spreadsheet updated after deposting notice is published in the Federal Register?		8		Could not find spreadsheet on the I:Drive.
PLD-2 Step 13	Was letter referencing Federal Register Notice mailed to owner?	4	4		
		20	20	0	
PLD-3 Step 4	Was the required OMB package prepared and provided to MBS for clearance?	2			
PLD-3 Step 8	Were the revised form(s) posted on the I: drive?	2			
		4	0	0	
BEAD/PLD-4 Step 1	Did the secretary input correspondence in tracking spreadsheet?				
BEAD/PLD-4 Step 2	Did the Director assign inquiry to staff with an internal suspense date?				
BEAD/PLD-4 Step 2	Was the assignment tracked?				
BEAD/PLD-4 Step 3	Was the draft correspondence saved to the I: drive using the folder number assigned by ODA as the file name?				
BEAD/PLD-4 Step 7	Were the final hard copies filed and recorded in reader file on I: drive?				
		0	0	0	
PLD-5 Step 10	Provided industry policy to MBS for clearance, signature, and submission (CD/ paper copy)				Could not determine if any policy changes occurred during the review period due to various processes being done by PLD members.
PLD-5 Step 13	Was Public Notice posted in the Federal Register?				
		0	0	0	
PLD-6 Step 2	PLD staff develops draft enforcement action within five business days	13	2		Reviewed 15 tasks in PAS
PLD-6 Step 9	PLD staff track the distribution of enforcement actions to identified media and industry outlets?	5			Reviewed 5 releases from Book 11.
		18	2	0	
PLD-7 Step 2	PLD Director assign folder to PLD staff to work			4	The assignments are made verbally and there's no way to track whether the Director actually assigned the task.
PLD-7 Step 13	PLD staff sends final rule to MBS for clearance and FR publication?			4	There were four regulation folders identified for the review period, however there's no task to MBS in the workflow. Therefore, this information couldn't be verified.
		0	0	8	
PLD-8 Step 3	PLD Director signature obtained on letter?		1		
PLD-8 Step 4.a	If rebuttal is received, did PLD staff send copy to the other party involved?	1			
PLD-8 Step 4.b	If rebuttal is not received, did PLD staff file the Reparation with the Hearing Clerk and receive a docket number?			1	
PLD-8 Step 5.a	If parties accept written hearing, did PLD send letter to all parties involved?	1			
PLD-8 Step 8	Did PLD send letter to parties for notification that additional time for submitting evidence has ended and the time period allowed to file a brief?	1			
PLD-8 Step 9	For every order/decision, was a Legal Specialist referred for a draft?	1			Due to date on cases the Regional Legal Specialist performed this task.
PLD-8 Step 9	For every order/decision from the Legal Specialist, did PLD staff provide a copy to OGC for review?	1			Jonathan Gordy from performed the review.
PLD-8 Step 11	Was every order/decision filed with Hearing Clerk for JO approval and signature?	1			
PLD-8 Step 12.b	For every order/decision not approved, did the PLD staff forward JO comments and/or corrections to the Legal Specialist?			1	
		6	1	2	
PLD-9 Step 4	Change Request submitted to webmaster?	3			
		3	0	0	

Packers and Stockyard Automated System (PAS) / Change Control Working Group (CCWG)		Y	N	N/A	Comments
PLD-1 Step 6.a. / 22 & 23 b	If stipulation or enforcement, was sanction tab completed?	10			Some did not include details in the description field, but sanction type and amount was entered.
PLD-1 Step 8	Was type of case identified in OGC tab?	1	2	7	This field may be duplicating information, so PLD should consider removing it as a field on folder.
PLD-1	Notes tab completed and up to-date	6			Some notes are just repeating task name, users need to either enter notes about the case and/or about work being done on the case. Entering the task name and date as a note isn't good notes for folder.
PLD-1	All tabs completed, all documents scanned (i.e. Case file, Transmittal, Compliant, Decision, etc)	6		19	
		23	2	26	
PLD-2	N/A				
		0	0	0	
PLD-3	N/A				
		0	0	0	
BEAD PLD-4	N/A				
		0	0	0	
PLD-5 Step 3	Was folder updated with the most current information available about each request?				Could not determine if any policy changes occurred during the review period due to various processes being done by PLD members.
		0	0	0	
PLD-6	N/A				
		0	0	0	
PLD-7 Step 3	Folder updated as needed in notes tab	4			
PLD-7 Step 7	PLD staff sends proposed rule to MBS for clearance and FR publication (documented in CCWG ECM Module or through email)?	1		3	1 of the folders contained notes entered by MBS, MBS clearance couldn't be verified for the other 3 folders.
		5	0	3	
PLD-8	Initial service letters added to the documents tab				1 Reparation was handled outside the system
PLD-8	Notes tab updated				1 Reparation was handled outside the system
		0	0	2	
PLD-9 Step 2.b	PLD submitted Change Request to CCWG?				3 Not required to submit to CCWG.
		0	0	3	

Attachment 3: Supporting Documents

PLD1 SOP (1) PLD Director or designee assigns case to PLD staff within three business days of receipt								
ECM#	Process Status	Name	Receivedate	Due date	Completedate	Days to complete	Compliant Y/N	Notes
51355	Completed	Assign Case	05/31/11 07:47 AM	06/03/11 07:47 AM	06/01/11 12:03 PM	1	Y	
55662	Completed	Assign Case	06/03/11 11:46 AM	06/08/11 11:46 AM	06/06/11 02:06 PM	1	Y	
62565	Completed	Assign Case	06/03/11 02:35 PM	06/08/11 02:35 PM	06/06/11 02:07 PM	1	Y	
65587	Completed	Assign Case	03/31/11 07:12 AM	04/05/11 07:12 AM	04/01/11 08:18 AM	1	Y	
65588	Completed	Assign Case	03/31/11 07:17 AM	04/05/11 07:17 AM	04/01/11 08:19 AM	1	Y	
65602	Completed	Assign Case	03/31/11 12:11 PM	04/05/11 12:11 PM	04/01/11 08:20 AM	1	Y	
65603	Completed	Assign Case	03/31/11 12:17 PM	04/05/11 12:17 PM	04/01/11 08:21 AM	1	Y	
65604	Completed	Assign Case	03/31/11 12:23 PM	04/05/11 12:23 PM	04/01/11 08:33 AM	1	Y	
67719	Completed	Assign Case	04/05/11 11:45 AM	04/08/11 11:45 AM	04/06/11 11:53 AM	1	Y	
68226	Completed	Assign Case	04/06/11 01:22 PM	04/11/11 01:22 PM	04/07/11 12:55 PM	1	Y	
68671	Completed	Assign Case	04/07/11 01:33 PM	04/12/11 01:33 PM	04/07/11 01:42 PM	0	Y	
69092	Completed	Assign Case	04/08/11 11:33 AM	04/13/11 11:33 AM	04/08/11 02:44 PM	0	Y	
69094	Completed	Assign Case	04/08/11 11:33 AM	04/13/11 11:33 AM	04/08/11 02:40 PM	0	Y	
69195	Completed	Assign Case	04/08/11 04:13 PM	04/13/11 04:13 PM	04/08/11 04:32 PM	0	Y	
71371	Completed	Assign Case	04/13/11 10:50 AM	04/18/11 10:50 AM	04/15/11 07:25 AM	2	Y	
73606	Completed	Assign Case	04/18/11 07:26 AM	04/21/11 07:26 AM	04/19/11 11:35 AM	1	Y	
73609	Completed	Assign Case	04/18/11 07:31 AM	04/21/11 07:31 AM	04/19/11 11:32 AM	1	Y	
73611	Completed	Assign Case	04/18/11 07:35 AM	04/21/11 07:35 AM	04/19/11 11:31 AM	1	Y	
74065	Completed	Assign Case	04/19/11 06:39 AM	04/22/11 06:39 AM	04/19/11 11:27 AM	0	Y	
74994	Completed	Assign Case	04/21/11 06:26 AM	04/26/11 06:26 AM	04/21/11 10:06 AM	0	Y	
75153	Completed	Assign Case	04/21/11 01:33 PM	04/26/11 01:33 PM	04/21/11 11:28 PM	0	Y	
78438	Completed	Assign Case	04/28/11 03:08 PM	05/03/11 03:08 PM	05/05/11 06:06 AM	5	N	
78446	Completed	Assign Case	04/28/11 03:30 PM	05/03/11 03:30 PM	05/05/11 06:04 AM	5	N	
80197	Completed	Assign Case	05/02/11 01:11 PM	05/05/11 01:11 PM	05/05/11 06:05 AM	3	Y	
81986	Completed	Assign Case	05/06/11 08:16 AM	05/11/11 08:16 AM	05/13/11 04:10 PM	5	N	
81986	Completed	Assign Case	06/10/11 02:53 PM	06/15/11 02:53 PM	06/22/11 07:29 AM	8	N	
82082	Completed	Assign Case	05/06/11 12:56 PM	05/11/11 12:56 PM	05/10/11 10:15 AM	2	Y	
82083	Completed	Assign Case	05/06/11 12:58 PM	05/11/11 12:58 PM	05/10/11 10:07 AM	2	Y	
83440	Completed	Assign Case	05/09/11 11:40 AM	05/12/11 11:40 AM	05/10/11 10:26 AM	1	Y	
83442	Completed	Assign Case	05/09/11 11:42 AM	05/12/11 11:42 AM	05/27/11 10:33 AM	14	N	
83443	Completed	Assign Case	05/09/11 11:45 AM	05/12/11 11:45 AM	05/10/11 10:26 AM	1	Y	
83488	Completed	Assign Case	05/09/11 01:47 PM	05/12/11 01:47 PM	05/10/11 10:07 AM	1	Y	
83893	Completed	Assign Case	05/10/11 10:39 AM	05/13/11 10:39 AM	05/13/11 04:20 PM	3	Y	
84338	Completed	Assign Case	05/11/11 09:27 AM	05/16/11 09:27 AM	05/13/11 04:35 PM	2	Y	
84760	Completed	Assign Case	05/12/11 07:38 AM	05/17/11 07:38 AM	05/13/11 04:38 PM	1	Y	
85233	Completed	Assign Case	05/13/11 07:42 AM	05/18/11 07:42 AM	05/13/11 04:22 PM	0	Y	
85312	Completed	Assign Case	05/13/11 11:30 AM	05/18/11 11:30 AM	05/13/11 04:55 PM	0	Y	
85391	Completed	Assign Case	05/13/11 03:19 PM	05/18/11 03:19 PM	05/13/11 04:57 PM	0	Y	

PLD1 SOP (1) PLD Director or designee assigns case to PLD staff within three business days of receipt								
ECM#	Process Status	Name	Receivedate	Due date	Completedate	Days to complete	Compliant Y/N	Notes
86573	Completed	Assign Case	05/16/11 07:39 AM	05/19/11 07:39 AM	05/17/11 01:00 PM	1	Y	
86575	Completed	Assign Case	05/16/11 07:41 AM	05/19/11 07:41 AM	05/17/11 01:01 PM	1	Y	
86629	Completed	Assign Case	05/16/11 10:22 AM	05/19/11 10:22 AM	05/17/11 01:14 PM	1	Y	
87027	Completed	Assign Case	05/17/11 07:31 AM	05/20/11 07:31 AM	05/17/11 12:56 PM	0	Y	
87065	Completed	Assign Case	05/17/11 09:22 AM	05/20/11 09:22 AM	05/17/11 12:59 PM	0	Y	
87225	Completed	Assign Case	05/17/11 04:21 PM	05/20/11 04:21 PM	05/18/11 12:38 PM	1	Y	
87980	Completed	Assign Case	05/19/11 07:13 AM	05/24/11 07:13 AM	05/24/11 01:27 PM	3	Y	
87981	Completed	Assign Case	05/19/11 07:14 AM	05/24/11 07:14 AM	05/19/11 02:38 PM	0	Y	
88510	Completed	Assign Case	05/20/11 09:24 AM	05/25/11 09:24 AM	05/24/11 01:22 PM	2	Y	
88513	Completed	Assign Case	05/20/11 09:30 AM	05/25/11 09:30 AM	05/24/11 01:23 PM	2	Y	
88514	Completed	Assign Case	05/20/11 09:30 AM	05/25/11 09:30 AM	05/24/11 01:00 PM	2	Y	
88515	Completed	Assign Case	05/20/11 09:30 AM	05/25/11 09:30 AM	05/24/11 01:24 PM	2	Y	
88517	Completed	Assign Case	05/20/11 09:31 AM	05/25/11 09:31 AM	05/24/11 01:25 PM	2	Y	
88518	Completed	Assign Case	05/20/11 09:31 AM	05/25/11 09:31 AM	05/24/11 01:25 PM	2	Y	
88530	Completed	Assign Case	05/20/11 10:06 AM	05/25/11 10:06 AM	05/24/11 01:28 PM	2	Y	
88595	Completed	Assign Case	05/20/11 01:13 PM	05/25/11 01:13 PM	05/24/11 01:29 PM	2	Y	
89970	Completed	Assign Case	05/23/11 01:54 PM	05/26/11 01:54 PM	05/24/11 01:29 PM	1	Y	
90883	Completed	Assign Case	05/25/11 11:35 AM	05/31/11 11:35 AM	05/27/11 10:33 AM	2	Y	
90908	Completed	Assign Case	05/25/11 12:29 PM	05/31/11 12:29 PM	05/27/11 10:31 AM	2	Y	
91402	Completed	Assign Case	05/26/11 01:28 PM	06/01/11 01:28 PM	05/27/11 10:30 AM	1	Y	
91415	Completed	Assign Case	05/26/11 02:03 PM	06/01/11 02:03 PM	05/27/11 10:09 AM	1	Y	
91472	Completed	Assign Case	05/26/11 04:26 PM	06/01/11 04:26 PM	05/27/11 10:05 AM	1	Y	
91831	Completed	Assign Case	05/27/11 11:20 AM	06/02/11 11:20 AM	05/27/11 11:51 AM	0	Y	
91871	Completed	Assign Case	05/27/11 01:23 PM	06/02/11 01:23 PM	06/01/11 06:39 AM	3	Y	
94609	Completed	Assign Case	06/02/11 01:00 PM	06/07/11 01:00 PM	06/02/11 01:14 PM	0	Y	
94614	Completed	Assign Case	06/02/11 01:14 PM	06/07/11 01:14 PM	06/02/11 01:21 PM	0	Y	
94617	Completed	Assign Case	06/02/11 01:15 PM	06/07/11 01:15 PM	06/02/11 01:21 PM	0	Y	
94620	Completed	Assign Case	06/02/11 01:22 PM	06/07/11 01:22 PM	06/02/11 01:50 PM	0	Y	
94621	Completed	Assign Case	06/02/11 01:22 PM	06/07/11 01:22 PM	06/02/11 01:51 PM	0	Y	
94624	Completed	Assign Case	06/02/11 01:23 PM	06/07/11 01:23 PM	06/02/11 01:45 PM	0	Y	
94625	Completed	Assign Case	06/02/11 01:23 PM	06/07/11 01:23 PM	06/02/11 01:51 PM	0	Y	
95133	Completed	Assign Case	06/03/11 02:56 PM	06/08/11 02:56 PM	06/06/11 02:33 PM	1	Y	
96660	Completed	Assign Case	06/06/11 04:07 PM	06/09/11 04:07 PM	06/07/11 10:29 AM	1	Y	
97007	Completed	Assign Case	06/07/11 10:24 AM	06/10/11 10:24 AM	06/07/11 10:30 AM	0	Y	
100014	Completed	Assign Case	06/13/11 09:51 AM	06/16/11 09:51 AM	06/22/11 07:48 AM	7	N	
100017	Completed	Assign Case	06/13/11 10:00 AM	06/16/11 10:00 AM	06/22/11 07:22 AM	7	N	
100108	Completed	Assign Case	06/13/11 02:01 PM	06/16/11 02:01 PM	06/22/11 07:49 AM	7	N	
100111	Completed	Assign Case	06/13/11 02:06 PM	06/16/11 02:06 PM	06/30/11 08:25 AM	13	N	

PLD1 SOP (1) PLD Director or designee assigns case to PLD staff within three business days of receipt

<u>ECM#</u>	<u>Process Status</u>	<u>Name</u>	<u>Receivedate</u>	<u>Duedate</u>	<u>Completedate</u>	<u>Days to complete</u>	<u>Compliant Y/N</u>	<u>Notes</u>
100114	Completed	Assign Case	06/13/11 02:13 PM	06/16/11 02:13 PM	06/30/11 08:37 AM	13	N	
100457	Completed	Assign Case	06/14/11 07:43 AM	06/17/11 07:43 AM	06/30/11 08:39 AM	12	N	
100964	Completed	Assign Case	06/15/11 08:06 AM	06/20/11 08:06 AM	06/22/11 07:51 AM	5	N	
100966	Completed	Assign Case	06/15/11 08:08 AM	06/20/11 08:08 AM	06/22/11 07:49 AM	5	N	
101482	Completed	Assign Case	06/16/11 10:07 AM	06/21/11 10:07 AM	06/22/11 07:45 AM	4	N	
101959	Completed	Assign Case	06/17/11 10:21 AM	06/22/11 10:21 AM	06/22/11 07:49 AM	3	Y	
101961	Completed	Assign Case	06/17/11 10:22 AM	06/22/11 10:22 AM	06/30/11 08:34 AM	9	N	
103310	Completed	Assign Case	06/20/11 10:11 AM	06/23/11 10:11 AM	06/30/11 08:52 AM	8	N	
103751	Completed	Assign Case	06/21/11 07:09 AM	06/24/11 07:09 AM	06/30/11 08:33 AM	7	N	
104746	Completed	Assign Case	06/23/11 08:01 AM	06/28/11 08:01 AM	06/30/11 08:55 AM	5	N	
105372	Completed	Assign Case	06/24/11 01:44 PM	06/29/11 01:44 PM	06/30/11 08:41 AM	4	N	
106729	Completed	Assign Case	06/27/11 01:34 PM	06/30/11 01:34 PM	06/30/11 08:31 AM	3	Y	
106730	Completed	Assign Case	06/27/11 01:35 PM	06/30/11 01:35 PM	06/30/11 08:32 AM	3	Y	
107311	Completed	Assign Case	06/29/11 09:41 AM	07/05/11 09:41 AM	06/30/11 08:58 AM	1	Y	

Total	90	
Yes	71	79%
No	19	21%

SOP(2) If the case is suitable for stipulation, PLD staff prepares a stipulation letter within five business days.

SOP (3) PLD staff assistant sends stipulation letter with approval signature within three business days of receipt.

ECM#	Task Name	Receivedate	Duedate	Completedate	Firstname	Days to complete	SOP #2 Compliant Y/N	SOP #3 Compliant Y/N
53336	Determine Course of Action	12/30/2010	1/21/2011	5/11/2011		0	Y	
53336	Prepare Stipulation Agreement	5/11/2011	5/18/2011	5/11/2011				
54320	Determine Course of Action	12/17/2010	1/10/2011	5/10/2011		0	Y	
54320	Prepare Stipulation Agreement	5/10/2011	5/17/2011	5/10/2011				
55662	Determine Course of Action	6/6/2011	6/27/2011	6/24/2011		2	Y	
55662	Prepare Stipulation Agreement	6/24/2011	7/1/2011	6/28/2011				
56745	Determine Course of Action	12/17/2010	1/10/2011	4/4/2011		0	Y	
56745	Prepare Stipulation Agreement	4/4/2011	4/11/2011	4/4/2011				
56813	Determine Course of Action	12/22/2010	1/13/2011	5/16/2011		7	N	
56813	Prepare Stipulation Agreement	5/16/2011	5/23/2011	5/25/2011				
56858	Determine Course of Action	12/22/2010	1/13/2011	5/24/2011		6	N	
56858	Prepare Stipulation Agreement	5/24/2011	6/1/2011	6/2/2011				
62078	Determine Course of Action	1/18/2011	2/8/2011	5/5/2011		0	Y	
62078	Prepare Stipulation Agreement	5/5/2011	5/12/2011	5/5/2011				
62255	Determine Course of Action	1/24/2011	2/14/2011	5/11/2011		0	Y	
62255	Prepare Stipulation Agreement	5/11/2011	5/18/2011	5/11/2011				
62762	Determine Course of Action	2/4/2011	2/28/2011	4/13/2011		12	N	
62762	Prepare Stipulation Agreement	4/13/2011	4/20/2011	4/29/2011				
63184	Determine Course of Action	2/23/2011	3/16/2011	5/3/2011		10	N	
63184	Prepare Stipulation Agreement	5/3/2011	5/10/2011	5/17/2011				
64637	Determine Course of Action	3/8/2011	3/29/2011	5/3/2011		10	N	
64637	Prepare Stipulation Agreement	5/3/2011	5/10/2011	5/17/2011				
64777	Determine Course of Action	3/14/2011	4/4/2011	4/20/2011		19	N	
64777	Prepare Stipulation Agreement	4/20/2011	4/27/2011	5/17/2011				
65602	Determine Course of Action	4/1/2011	4/22/2011	4/21/2011		15	N	
65602	Prepare Stipulation Agreement	4/21/2011	4/28/2011	5/12/2011				
65603	Determine Course of Action	4/1/2011	4/22/2011	4/4/2011		0	Y	
65603	Prepare Stipulation Agreement	4/4/2011	4/11/2011	4/4/2011				
74994	Determine Course of Action	4/21/2011	5/12/2011	5/12/2011		17	N	
74994	Prepare Stipulation Agreement	6/7/2011	6/14/2011	6/7/2011				
82082	Determine Course of Action	5/10/2011	6/1/2011	6/16/2011		0	Y	
82082	Prepare Stipulation Agreement	6/16/2011	6/23/2011	6/16/2011				
82083	Determine Course of Action	5/10/2011	6/1/2011	6/29/2011		0	Y	
82083	Prepare Stipulation Agreement	6/29/2011	7/7/2011	6/29/2011				
83440	Determine Course of Action	5/10/2011	6/1/2011	5/11/2011		0	Y	
83440	Prepare Stipulation Agreement	5/11/2011	5/18/2011	5/11/2011				
84760	Determine Course of Action	5/13/2011	6/6/2011	5/17/2011		0	Y	
84760	Prepare Stipulation Agreement	5/17/2011	5/24/2011	5/17/2011				

SOP(2) If the case is suitable for stipulation, PLD staff prepares a stipulation letter within five business days.

SOP (3) PLD staff assistant sends stipulation letter with approval signature within three business days of receipt.

ECM#	Task Name	Receivedate	Duedate	Completedate	Firstname	Days to complete	SOP #2 Compliant Y/N	SOP #3 Compliant Y/N
86575	Determine Course of Action	5/17/2011	6/8/2011	6/29/2011		0	Y	
86575	Prepare Stipulation Agreement	6/29/2011	7/7/2011	6/29/2011				
89970	Determine Course of Action	5/24/2011	6/15/2011	6/15/2011		0	Y	
89970	Prepare Stipulation Agreement	6/15/2011	6/22/2011	6/15/2011				
100108	Determine Course of Action	6/22/2011	7/14/2011	6/28/2011		0	Y	
100108	Prepare Stipulation Agreement	6/28/2011	7/6/2011	6/28/2011				
101959	Determine Course of Action	6/22/2011	7/14/2011	6/28/2011		0	Y	
101959	Prepare Stipulation Agreement	6/28/2011	7/6/2011	6/28/2011				
53336	Mail Stipulation Agreement	5/11/2011	5/16/2011	5/12/2011		1		Y
54320	Mail Stipulation Agreement	5/10/2011	5/13/2011	5/11/2011		1		Y
55662	Mail Stipulation Agreement	6/28/2011	7/1/2011	6/29/2011		1		Y
56745	Mail Stipulation Agreement	4/4/2011	4/7/2011	4/5/2011		1		Y
56813	Mail Stipulation Agreement	6/8/2011	5/31/2011	5/26/2011				
56813	Mail Stipulation Agreement	6/8/2011	6/13/2011	6/9/2011		1		Y
62078	Mail Stipulation Agreement	5/5/2011	5/10/2011	5/10/2011		3		Y
62565	Mail Stipulation Agreement	6/27/2011	6/30/2011	6/27/2011		0		Y
62762	Mail Stipulation Agreement	4/29/2011	5/4/2011	5/9/2011		6		N
63181	Mail Stipulation Agreement	3/31/2011	3/24/2011	4/5/2011				
63181	Mail Stipulation Agreement	5/3/2011	5/6/2011	5/4/2011		24		N
63184	Mail Stipulation Agreement	5/17/2011	5/20/2011	5/18/2011		1		Y
64637	Mail Stipulation Agreement	5/17/2011	5/20/2011	5/18/2011		1		Y
64777	Mail Stipulation Agreement	5/17/2011	5/20/2011	5/18/2011		1		Y
65041	Mail Stipulation Agreement	5/16/2011	5/19/2011	5/16/2011		0		Y
65602	Mail Stipulation Agreement	5/12/2011	5/17/2011	5/13/2011		1		Y
65603	Mail Stipulation Agreement	4/4/2011	4/7/2011	4/5/2011		1		Y
74994	Mail Stipulation Agreement	6/7/2011	6/10/2011	6/9/2011				
74994	Mail Stipulation Agreement	6/9/2011	6/14/2011	6/9/2011		2		Y
82082	Mail Stipulation Agreement	6/16/2011	6/21/2011	6/16/2011		0		Y
82083	Mail Stipulation Agreement	6/29/2011	7/5/2011	6/29/2011		0		Y
83440	Mail Stipulation Agreement	5/11/2011	5/16/2011	5/12/2011		1		Y
84760	Mail Stipulation Agreement	5/17/2011	5/20/2011	5/18/2011		1		Y
89970	Mail Stipulation Agreement	6/15/2011	6/20/2011	6/16/2011		1		Y
100108	Mail Stipulation Agreement	6/28/2011	7/1/2011	6/28/2011		0		Y
101959	Mail Stipulation Agreement	6/28/2011	7/1/2011	6/28/2011		0		Y

Note: Control numbers highlighted in yellow were deemed not applicable. These folders had to be place on-hold to pursue higher priority cases at that time.

Total	23	23
Yes	15	21
No	8	2

PLD1 SOP (4) For enforcement, PLD staff prepares the case file and attaches transmittal letter within five business days for OGC review.									
PLD1 SOP (5) For enforcement, PLD Director approves document and sends to OGC within three business days of receipt.									
ECM#	Task Name	Receivedate	Duedate	Completedate	Days to Complete	SOP#4 Compliant Y/N	Transmittal Letter Y/N	SOP#5 Compliant Y/N	<5 instead of <3
50671	Prepare Case for OGC Consultation	05/04/11 04:20 PM	05/11/11 04:20 PM	05/04/11 04:28 PM	0	Y			
50671	Approve & Sign Case	05/04/11 04:28 PM	05/11/11 04:28 PM	05/18/11 01:46 PM	10			N	N
51408	Prepare Case for OGC Consultation	05/16/11 11:31 AM	05/23/11 11:31 AM	05/16/11 11:42 AM	0	Y			
51408	Approve & Sign Case	05/16/11 11:42 AM	05/23/11 11:42 AM	05/27/11 09:59 AM	9			N	N
51565	Prepare Case for OGC Consultation	06/26/11 09:15 PM	07/01/11 09:15 PM	06/26/11 09:17 PM	-1	Y			
51647	Prepare Case for OGC Consultation	12/27/10 01:04 PM	01/03/11 01:04 PM	06/22/11 08:40 AM	123	N			
56745	Prepare Case for OGC Consultation	06/22/11 08:40 AM	06/29/11 08:40 AM	06/22/11 08:41 AM	0	Y			
56814	Prepare Case for OGC Consultation	05/11/11 01:12 PM	05/18/11 01:12 PM	05/13/11 12:42 PM	2	Y			
56814	Approve & Sign Case	05/13/11 12:42 PM	05/20/11 12:42 PM	05/18/11 12:14 PM	3			Y	Y
56858	Prepare Case for OGC Consultation	06/02/11 04:01 PM	06/09/11 04:01 PM	06/06/11 10:52 PM	2	Y			
56858	Approve & Sign Case	06/06/11 10:52 PM	06/13/11 10:52 PM	06/22/11 06:38 AM	12			N	N
62255	Prepare Case for OGC Consultation	05/11/11 02:18 PM	05/18/11 02:18 PM	05/11/11 02:18 PM	0	Y			
62255	Approve & Sign Case	05/11/11 02:18 PM	05/18/11 02:18 PM	05/17/11 01:27 PM	4			N	Y
62355	Prepare Case for OGC Consultation	02/15/11 01:21 PM	02/23/11 01:21 PM	04/18/11 03:57 PM	43	N			
62355	Approve & Sign Case	04/18/11 03:57 PM	04/25/11 03:57 PM	04/19/11 11:44 AM	1			Y	Y
62565	Prepare Case for OGC Consultation	03/14/11 03:34 PM	03/21/11 03:34 PM	05/11/11 09:42 AM	42	N			
62567	Prepare Case for OGC Consultation	04/11/11 03:38 PM	04/18/11 03:38 PM	05/03/11 12:10 PM	16	N			
62567	Approve & Sign Case	05/03/11 12:10 PM	05/10/11 12:10 PM	05/12/11 02:52 PM	7			N	N
62609	Prepare Case for OGC Consultation	05/04/11 03:26 PM	05/11/11 03:26 PM	05/04/11 03:31 PM	0	Y			
62609	Approve & Sign Case	05/04/11 03:31 PM	05/11/11 03:31 PM	05/18/11 01:31 PM	10			N	N
62951	Prepare Case for OGC Consultation	05/30/11 09:41 PM	06/06/11 09:41 PM	05/30/11 09:42 PM	-1	Y			
62951	Approve & Sign Case	05/30/11 09:42 PM	06/06/11 09:42 PM	06/01/11 12:19 PM	1			Y	Y
62951	Approve & Sign Case	06/05/11 09:08 PM	06/10/11 09:08 PM	06/22/11 07:21 AM	12			N	N
62952	Prepare Case for OGC Consultation	03/14/11 03:47 PM	03/21/11 03:47 PM	05/10/11 03:24 PM	41	N			
62952	Approve & Sign Case	05/10/11 03:24 PM	05/17/11 03:24 PM	05/17/11 01:25 PM	5			N	Y
62953	Approve & Sign Case	03/29/11 07:03 AM	04/05/11 07:03 AM	04/01/11 08:12 AM	3			Y	Y
63149	Approve & Sign Case	03/29/11 09:34 AM	04/05/11 09:34 AM	04/01/11 08:17 AM	3			Y	Y
63181	Prepare Case for OGC Consultation	04/21/11 11:10 AM	04/28/11 11:10 AM	04/21/11 11:10 AM	0	Y			
63181	Approve & Sign Case	04/21/11 11:10 AM	04/28/11 11:10 AM	05/03/11 12:06 PM	8			N	N
63182	Approve & Sign Case	03/28/11 12:48 PM	04/04/11 12:48 PM	04/01/11 08:02 AM	4			N	Y
63210	Prepare Case for OGC Consultation	03/22/11 06:25 AM	03/29/11 06:25 AM	04/04/11 01:34 PM	9	N			
63210	Approve & Sign Case	04/04/11 01:34 PM	04/11/11 01:34 PM	04/12/11 06:08 AM	6			N	N
63210	Approve & Sign Case	05/03/11 11:51 AM	05/10/11 11:51 AM	05/24/11 01:26 PM	15			N	N
63249	Prepare Case for OGC Consultation	03/22/11 06:31 AM	03/29/11 06:31 AM	04/04/11 01:53 PM	9	N			
63249	Approve & Sign Case	04/04/11 01:53 PM	04/11/11 01:53 PM	04/12/11 06:18 AM	6			N	N
63253	Prepare Case for OGC Consultation	05/13/11 09:03 PM	05/20/11 09:03 PM	05/13/11 09:03 PM	0	Y			
63253	Approve & Sign Case	05/13/11 09:03 PM	05/20/11 09:03 PM	05/27/11 01:43 PM	10			N	N
64338	Prepare Case for OGC Consultation	03/24/11 09:36 PM	03/31/11 09:36 PM	04/15/11 09:46 AM	16	N			
64342	Prepare Case for OGC Consultation	03/24/11 09:40 PM	03/31/11 09:40 PM	04/07/11 02:47 PM	10	N			
64342	Approve & Sign Case	04/07/11 02:47 PM	04/14/11 02:47 PM	04/12/11 05:39 AM	3			Y	Y
64342	Approve & Sign Case	04/15/11 09:14 AM	04/22/11 09:14 AM	04/19/11 01:19 PM	2			Y	Y
64406	Prepare Case for OGC Consultation	03/24/11 07:20 AM	03/31/11 07:20 AM	04/04/11 01:34 PM	7	N			
64406	Approve & Sign Case	04/04/11 01:34 PM	04/11/11 01:34 PM	04/08/11 07:06 AM	4			N	Y
64406	Approve & Sign Case	04/11/11 09:54 AM	04/18/11 09:54 AM	04/18/11 12:51 PM	5			N	Y
64494	Prepare Case for OGC Consultation	03/28/11 12:28 PM	04/04/11 12:28 PM	04/04/11 01:02 PM	5	Y			
64494	Approve & Sign Case	04/04/11 01:02 PM	04/11/11 01:02 PM	04/07/11 01:40 PM	3			Y	Y
64843	Prepare Case for OGC Consultation	03/28/11 01:16 PM	04/04/11 01:16 PM	04/14/11 09:19 AM	13	N			
64843	Approve & Sign Case	04/14/11 09:19 AM	04/21/11 09:19 AM	04/19/11 12:53 PM	3			Y	Y
64843	Approve & Sign Case	04/21/11 09:40 AM	04/28/11 09:40 AM	04/21/11 10:45 AM	0			Y	Y
65020	Prepare Case for OGC Consultation	04/04/11 09:56 AM	04/11/11 09:56 AM	04/21/11 01:52 PM	13	N			
65020	Approve & Sign Case	04/21/11 01:52 PM	04/28/11 01:52 PM	05/05/11 07:16 AM	10			N	N
65041	Prepare Case for OGC Consultation	05/02/11 11:59 AM	05/09/11 11:59 AM	05/02/11 11:59 AM	0	Y			

PLD1 SOP (4) For enforcement, PLD staff prepares the case file and attaches transmittal letter within five business days for OGC review.

PLD1 SOP (5) For enforcement, PLD Director approves document and sends to OGC within three business days of receipt.

ECM#	Task Name	Receivedate	Duedate	Completedate	Days to Complete	SOP#4 Compliant Y/N	Transmittal Letter Y/N	SOP#5 Compliant Y/N	<5 instead of <3
65041	Approve & Sign Case	05/02/11 11:59 AM	05/09/11 11:59 AM	05/13/11 04:17 PM	9			N	N
65280	Prepare Case for OGC Consultation	04/13/11 01:27 PM	04/20/11 01:27 PM	04/27/11 12:09 PM	10	N			
65280	Approve & Sign Case	04/27/11 12:09 PM	05/04/11 12:09 PM	05/18/11 01:15 PM	15			N	N
65364	Prepare Case for OGC Consultation	04/19/11 01:59 PM	04/26/11 01:59 PM	04/27/11 01:01 PM	6	N			
65364	Approve & Sign Case	04/27/11 01:01 PM	05/04/11 01:01 PM	05/18/11 12:07 PM	15			N	N
65587	Prepare Case for OGC Consultation	04/26/11 12:43 PM	05/03/11 12:43 PM	05/04/11 12:47 PM	6	N			
65587	Approve & Sign Case	05/04/11 12:47 PM	05/11/11 12:47 PM	05/24/11 01:27 PM	14			N	N
67719	Prepare Case for OGC Consultation	04/07/11 02:49 PM	04/14/11 02:49 PM	04/07/11 02:51 PM	0	Y			
67719	Approve & Sign Case	04/07/11 02:51 PM	04/14/11 02:51 PM	04/19/11 01:25 PM	8			N	N
68671	Prepare Case for OGC Consultation	04/07/11 02:02 PM	04/14/11 02:02 PM	04/07/11 02:08 PM	0	Y			
68671	Approve & Sign Case	04/07/11 02:08 PM	04/14/11 02:08 PM	04/12/11 06:31 AM	3			Y	Y
68671	Approve & Sign Case	04/15/11 08:59 AM	04/22/11 08:59 AM	04/19/11 12:45 PM	2			Y	Y
69195	Prepare Case for OGC Consultation	05/11/11 10:31 AM	05/18/11 10:31 AM	06/06/11 10:39 AM	17	N			
69195	Approve & Sign Case	06/06/11 10:39 AM	06/13/11 10:39 AM	06/21/11 09:45 AM	11			N	N
71371	Prepare Case for OGC Consultation	04/21/11 11:07 AM	04/28/11 11:07 AM	04/21/11 11:07 AM	0	Y			
71371	Approve & Sign Case	04/21/11 11:07 AM	04/28/11 11:07 AM	05/12/11 02:46 PM	15			N	N
74994	Prepare Case for OGC Consultation	05/12/11 01:27 PM	05/19/11 01:27 PM	06/07/11 03:11 PM	17	N			
83442	Prepare Case for OGC Consultation	05/31/11 10:28 AM	06/07/11 10:28 AM	05/31/11 10:30 AM	0	Y			
83442	Approve & Sign Case	05/31/11 10:30 AM	06/07/11 10:30 AM	06/01/11 08:38 AM	1			Y	Y
83488	Prepare Case for OGC Consultation	05/10/11 12:56 PM	05/17/11 12:56 PM	05/10/11 01:00 PM	0	Y			
83488	Approve & Sign Case	05/10/11 01:00 PM	05/17/11 01:00 PM	05/17/11 01:20 PM	5			N	Y
84760	Prepare Case for OGC Consultation	06/28/11 08:05 AM	07/06/11 08:05 AM	06/28/11 08:06 AM	0	Y			
85312	Prepare Case for OGC Consultation	06/06/11 07:54 PM	06/13/11 07:54 PM	06/26/11 08:30 PM	14	N			
85391	Prepare Case for OGC Consultation	05/16/11 04:06 PM	05/23/11 04:06 PM	05/24/11 05:07 PM	6	N			
85391	Approve & Sign Case	05/24/11 05:07 PM	06/01/11 05:07 PM	05/27/11 10:50 AM	3			Y	Y
85391	Approve & Sign Case	06/06/11 07:20 PM	06/13/11 07:20 PM	06/22/11 06:32 AM	12			N	N
86629	Prepare Case for OGC Consultation	05/17/11 03:17 PM	05/24/11 03:17 PM	05/17/11 03:18 PM	0	Y			
86629	Approve & Sign Case	05/17/11 03:18 PM	05/24/11 03:18 PM	05/17/11 03:57 PM	0			Y	Y
87027	Prepare Case for OGC Consultation	05/18/11 10:30 AM	05/25/11 10:30 AM	05/18/11 10:31 AM	0	Y			
87027	Approve & Sign Case	05/18/11 10:31 AM	05/25/11 10:31 AM	05/18/11 11:42 AM	0			Y	Y
87065	Prepare Case for OGC Consultation	05/17/11 06:17 PM	05/24/11 06:17 PM	05/17/11 06:22 PM	0	Y			
87065	Approve & Sign Case	05/17/11 06:22 PM	05/24/11 06:22 PM	05/17/11 06:28 PM	0			Y	Y
87225	Prepare Case for OGC Consultation	05/23/11 02:07 PM	05/31/11 02:07 PM	05/23/11 02:08 PM	0	Y			
87225	Approve & Sign Case	05/23/11 02:08 PM	05/31/11 02:08 PM	05/27/11 10:37 AM	4			N	Y
87981	Prepare Case for OGC Consultation	06/10/11 08:06 PM	06/17/11 08:06 PM	06/10/11 08:10 PM	0	Y			
87981	Approve & Sign Case	06/10/11 08:10 PM	06/17/11 08:10 PM	06/22/11 06:55 AM	8			N	N
91871	Prepare Case for OGC Consultation	06/15/11 07:40 AM	06/22/11 07:40 AM	06/15/11 07:42 AM	0	Y			
91871	Approve & Sign Case	06/15/11 07:42 AM	06/22/11 07:42 AM	06/22/11 07:13 AM	5			N	Y
94609	Prepare Case for OGC Consultation	06/02/11 01:49 PM	06/09/11 01:49 PM	06/02/11 01:50 PM	0	Y			
94609	Approve & Sign Case	06/02/11 01:50 PM	06/09/11 01:50 PM	06/16/11 08:11 AM	10			N	N
95133	Prepare Case for OGC Consultation	06/17/11 10:17 AM	06/24/11 10:17 AM	06/17/11 10:18 AM	0	Y			
95133	Approve & Sign Case	06/17/11 10:18 AM	06/24/11 10:18 AM	06/22/11 07:12 AM	3			Y	Y
97007	Prepare Case for OGC Consultation	06/08/11 02:09 PM	06/15/11 02:09 PM	06/08/11 02:11 PM	0	Y			
97007	Approve & Sign Case	06/08/11 02:11 PM	06/15/11 02:11 PM	06/22/11 06:41 AM	10			N	N
100964	Prepare Case for OGC Consultation	06/22/11 02:29 PM	06/29/11 02:29 PM	06/22/11 03:16 PM	0	Y			
100966	Prepare Case for OGC Consultation	06/22/11 01:42 PM	06/29/11 01:42 PM	06/22/11 01:42 PM	0	Y			
100966	Approve & Sign Case	06/22/11 01:42 PM	06/29/11 01:42 PM	06/24/11 09:06 AM	2			Y	Y

Total	49		50	50
Yes	30		19	27
No	19		31	23

(6) If the Respondent accepts stipulation, the designated PLD liaison will submit payment to GIPSA lockbox and related paperwork to APHIS within one business day of receipt

ECM #	Stip Received Stamp Date	Mail Check Date	NOTES
26541	3/15/2011	3/15/2011	1 not all documents have a date stamp visible.
63181	5/3/2011	5/3/2011	1
39962	5/4/2011	5/4/2011	1
26572	n/a		
34715	2/8/2011	5/17/2011	70 N/A; Entity mailed check late
47459	4/14/2011	4/27/2011	10 N/A; Conflicting documents about when check sent to
65041	5/16/2011	6/8/2011	17 APHIS. Entity mailed check late
83440	6/7/2011	6/7/2011	1
65603	6/7/2011	6/15/2011	7
64545	4/11/2011	4/13/2011	3

Note: Control numbers highlighted in yellow were deemed not applicable.

(7) If PLD has comments on draft complaint, it will be returned to OGC with corrections and updates within three business days after initial receipt.

(8) If PLD has no comments on draft complaint, PLD will inform the attorney assigned to the case within two business days after initial receipt.

Eccontrol#	Task Name	Receivedate	Duedate	Completedate	Firstname	Lastname	
26329	Review and Approv	11/27/09 10:30 AM	12/02/09 10:30 AM	12/02/09 01:13 PM	Cara	McCarthy	5
26329	Review and Approv	12/02/09 01:13 PM	12/04/09 01:13 PM	12/03/09 02:52 PM	Steven	Offutt	
26329	Review and Approv	12/03/09 02:52 PM	12/08/09 02:52 PM	12/07/09 02:59 PM	Christopher	Young	
26329	Review and Approv	12/07/09 02:59 PM	12/10/09 02:59 PM	12/15/09 10:14 AM	Patrice	Harps	
26329	Review and Approv	12/15/09 10:14 AM	12/18/09 10:14 AM	01/05/10 11:44 AM	Steven	Offutt	
26606	Review and Approv	11/17/09 10:30 PM	11/20/09 10:30 PM	11/18/09 02:51 PM	Jeana	Harbison	9
26606	Review, Revise App	11/18/09 02:51 PM	11/23/09 02:51 PM	11/27/09 08:58 AM	Steven	Offutt	
26606	Review and Approv	11/27/09 08:58 AM	12/02/09 08:58 AM	11/27/09 10:49 AM	Christopher	Young	
26606	Review and Approv	11/27/09 10:49 AM	12/02/09 10:49 AM	12/24/09 10:09 AM	Patrice	Harps	
26606	Review, Revise App	12/24/09 10:09 AM	12/30/09 10:09 AM	01/07/10 09:23 AM	Christopher	Young	
26606	Review and Approv	01/07/10 09:23 AM	01/12/10 09:23 AM	01/11/10 08:21 AM	Patrice	Harps	
26606	Review and Approv	01/11/10 08:21 AM	01/14/10 08:21 AM	01/22/10 07:29 AM	Steven	Offutt	
26701	Review and Approv	09/28/10 01:40 PM	10/01/10 01:40 PM	09/28/10 02:07 PM	Peter	Jackson	9
26760	Review and Approv	10/14/10 01:15 PM	10/19/10 01:15 PM	10/19/10 09:05 AM	Jeana	Harbison	
26760	Review, Revise App	10/19/10 09:05 AM	10/22/10 09:05 AM	10/26/10 10:40 AM	Steven	Offutt	
26760	Review, Revise App	10/26/10 10:40 AM	10/29/10 10:40 AM	11/08/10 02:29 PM	Ciarra	Toomey	
26760	Review and Approv	11/08/10 02:29 PM	11/12/10 02:29 PM	11/16/10 07:17 AM	Patrice	Harps	
26760	Review and Approv	11/16/10 07:17 AM	11/19/10 07:17 AM	12/01/10 02:03 PM	Gale	Mason	
26768	Review and Approv	07/22/10 09:03 AM	07/27/10 09:03 AM	07/26/10 04:44 PM	Gale	Mason	34
26768	Review, Revise App	08/02/10 08:49 AM	08/05/10 08:49 AM	09/07/10 07:15 AM	Steven	Offutt	
26768	Review, Revise App	09/07/10 07:15 AM	09/10/10 07:15 AM	10/14/10 09:17 AM	Brian	Sylvester	
26768	Review and Approv	10/14/10 09:17 AM	10/19/10 09:17 AM	12/14/10 05:06 PM	Patrice	Harps	
26768	Review, Revise App	12/14/10 05:06 PM	12/17/10 05:06 PM	12/22/10 01:05 PM	Brian	Sylvester	
26768	Review and Approv	12/22/10 01:05 PM	12/28/10 01:05 PM	12/22/10 02:47 PM	Patrice	Harps	
26768	Review and Approv	12/22/10 02:47 PM	12/28/10 02:47 PM	12/22/10 06:55 PM	Gale	Mason	
26866	Review and Approv	03/09/10 01:14 PM	03/12/10 01:14 PM	03/17/10 03:48 PM	Patrice	Harps	
29341	Review and Approv	03/07/10 05:51 PM	03/10/10 05:51 PM	03/08/10 04:17 PM	Patrice	Harps	6
29344	Review and Approv	03/07/10 11:46 AM	03/10/10 11:46 AM	03/08/10 04:14 PM	Patrice	Harps	
29415	Review and Approv	03/07/10 06:05 PM	03/10/10 06:05 PM	03/08/10 04:29 PM	Patrice	Harps	
29439	Review and Approv	11/20/09 11:47 AM	11/25/09 11:47 AM	11/25/09 12:17 PM	Cara	McCarthy	
29439	Review and Approv	11/25/09 12:17 PM	11/30/09 12:17 PM	11/27/09 08:51 AM	Steven	Offutt	
29439	Review and Approv	11/27/09 08:51 AM	12/02/09 08:51 AM	11/27/09 10:25 AM	Christopher	Young	23
29439	Review and Approv	11/27/09 10:25 AM	12/02/09 10:25 AM	12/15/09 10:17 AM	Patrice	Harps	
29439	Review and Approv	12/15/09 10:17 AM	12/18/09 10:17 AM	01/05/10 11:45 AM	Steven	Offutt	
33367	Review and Approv	03/08/10 01:40 PM	03/11/10 01:40 PM	03/08/10 04:36 PM	Patrice	Harps	
34076	Review and Approv	02/25/10 09:13 AM	03/02/10 09:13 AM	03/08/10 10:48 AM	Amy	Blechinger	
34076	Review and Approv	03/25/10 07:33 AM	03/29/10 07:33 AM	03/29/10 12:01 PM	Steven	Offutt	1
34076	Review and Approv	03/29/10 12:01 PM	04/01/10 12:01 PM	04/09/10 02:05 PM	Christopher	Young	
34076	Review and Approv	04/09/10 02:05 PM	04/14/10 02:05 PM	04/15/10 07:07 AM	Patrice	Harps	
34076	Review and Approv	04/15/10 07:07 AM	04/20/10 07:07 AM	04/15/10 09:44 AM	Gale	Mason	
34076	Review, Revise App	04/15/10 09:44 AM	04/20/10 09:44 AM	04/15/10 05:17 PM	Patrice	Harps	
34076	Review and Approv	04/15/10 05:17 PM	04/20/10 05:17 PM	04/16/10 08:44 AM	Gale	Mason	8
40255	Review and Approv	04/01/10 04:12 PM	04/07/10 04:12 PM	04/02/10 07:34 AM	Raymond	Minks	
40255	Review and Approv	04/12/10 07:54 AM	04/14/10 07:54 AM	04/12/10 10:37 AM	Gale	Mason	
40255	Review and Approv	04/12/10 10:37 AM	04/15/10 10:37 AM	04/12/10 10:52 AM	Brian	Sylvester	
40255	Review and Approv	04/12/10 10:52 AM	04/15/10 10:52 AM	04/13/10 10:19 AM	Patrice	Harps	
40255	Review and Approv	04/13/10 10:19 AM	04/16/10 10:19 AM	04/15/10 04:07 PM	Gale	Mason	23
42351	Review and Approv	02/25/11 11:57 AM	03/02/11 11:57 AM	02/25/11 04:02 PM	Patrice	Harps	
43193	Review and Approv	09/30/10 12:12 PM	10/05/10 12:12 PM	09/30/10 12:35 PM	Patrice	Harps	

Note: Those items highlighted in blue in column I apply to question 7 and those highlighted in yellow apply to question 8.

(9) PLD staff assistant will make the appropriate number of hard copies of the approved complaint and file at Hearing Clerk Office within one business day after receipt of signed copy from Deputy Administrator

ECM Control#	Task Name	Receivedate	Duedate	Completedate	Firstname	Lastname	
26329	Sign Formal Complaint	01/05/10 11:44 AM	01/13/10 11:44 AM	01/05/10 03:12 PM	Alan	Christian	4
26329	File and Scan Docketed Complaint	01/05/10 03:12 PM	01/08/10 03:12 PM	01/08/10 02:16 PM	Donnaa	Ash	
26606	Sign Formal Complaint	01/22/10 07:29 AM	02/01/10 07:29 AM	01/22/10 07:36 AM	Alan	Christian	3
26606	File and Scan Docketed Complaint	01/22/10 07:36 AM	01/27/10 07:36 AM	01/26/10 09:14 AM	Donnaa	Ash	
26760	Sign Formal Complaint	12/01/10 02:03 PM	12/09/10 02:03 PM	12/06/10 09:54 AM	Alan	Christian	5
26760	File and Scan Docketed Complaint	12/06/10 09:54 AM	12/09/10 09:54 AM	12/10/10 07:07 AM	Donnaa	Ash	
26768	Sign Formal Complaint	12/22/10 06:55 PM	12/31/10 06:55 PM	12/23/10 06:48 AM	Alan	Christian	3
26768	File and Scan Docketed Complaint	12/23/10 06:48 AM	12/29/10 06:48 AM	12/28/10 12:10 PM	Donnaa	Ash	
29439	Sign Formal Complaint	01/05/10 11:45 AM	01/13/10 11:45 AM	01/05/10 03:13 PM	Alan	Christian	4
29439	File and Scan Docketed Complaint	01/05/10 03:13 PM	01/08/10 03:13 PM	01/08/10 05:51 AM	Donnaa	Ash	
34076	Sign Formal Complaint	04/16/10 08:44 AM	04/26/10 08:44 AM	04/19/10 09:47 AM	Alan	Christian	7
34076	File and Scan Docketed Complaint	04/19/10 09:47 AM	04/22/10 09:47 AM	04/27/10 12:04 PM	Donnaa	Ash	
40255	Sign Formal Complaint	04/15/10 04:07 PM	04/23/10 04:07 PM	04/19/10 09:26 AM	Alan	Christian	1
40255	File and Scan Docketed Complaint	04/19/10 09:26 AM	04/22/10 09:26 AM	04/19/10 01:19 PM	Donnaa	Ash	

Measure quarterly the average time to conduct an investigation and resolve the case through an internal P&SP resolution.

Control	Reg	Rec'd PLD	Closed	Rec'd OGC	Rec'd DOJ	Complaint OGC/DOJ	Days in HQ	Days In PLD	Sanction	Penalty	Action
94625	ERO	06/02/11	06/07/11				5	5	No Action Taken		0 PLD
94624	ERO	06/02/11	06/07/11				5	5	No Action Taken		0 PLD
94621	ERO	06/02/11	06/07/11				5	5	No Action Taken		0 PLD
94620	ERO	06/02/11	06/07/11				5	5	No Action Taken		0 PLD
94617	ERO	06/02/11	06/07/11				5	5	No Action Taken		0 PLD
94614	ERO	06/02/11	06/07/11				5	5	No Action Taken		0 PLD
88514	ERO	05/20/11	06/01/11				12	12	No Action Taken		0 PLD
88518	ERO	05/20/11	06/01/11				12	12	No Action Taken		0 PLD
88517	ERO	05/20/11	06/01/11				12	12	No Action Taken		0 PLD
88515	ERO	05/20/11	06/01/11				12	12	No Action Taken		0 PLD
88513	ERO	05/20/11	06/01/11				12	12	No Action Taken		0 PLD
88510	ERO	05/20/11	06/01/11				12	12	No Action Taken		0 PLD
69094	ERO	04/08/11	05/05/11				27	27	No Action Taken		0 PLD
69092	ERO	04/08/11	05/05/11				27	27	No Action Taken		0 PLD
68226	ERO	04/06/11	05/05/11				29	29	No Action Taken		0 PLD
65588	ERO	03/31/11	05/05/11				35	35	No Action Taken		0 PLD
83440	MRO	05/09/11	06/16/11				38	38	Stipulation	1,500	PLD
64755	ERO	03/10/11	05/05/11				56	56	No Action Taken		0 PLD
64343	ERO	02/28/11	05/05/11				66	66	No Action Taken		0 PLD
64338	ERO	02/28/11	05/05/11				66	66	No Action Taken		0 PLD
63249	ERO	02/17/11	05/05/11				77	77	No Action Taken		0 PLD
62947	ERO	02/09/11	05/05/11				85	85	No Action Taken		0 PLD
63181	MRO	02/16/11	05/12/11				85	85	Stipulation	1,300	PLD
65041	MRO	03/16/11	06/09/11				85	85	Stipulation	3,000	PLD
65603	MRO	03/31/11	06/30/11				91	91	Stipulation	2,425	PLD
62530	ERO	01/28/11	05/05/11				97	97	No Action Taken		0 PLD
65072	WRO	03/16/11	06/30/11				106	106	Stipulation	3,700	PLD
62353	ERO	01/21/11	05/19/11				118	118	Stipulation	5,000	PLD
64545	WRO	03/04/11	06/30/11				118	118	Stipulation	1,500	PLD
64515	ERO	03/03/11	06/30/11				119	119	Stipulation	3,500	PLD
62943	WRO	02/09/11	06/30/11				141	141	Stipulation	1,075	PLD
62067	WRO	01/11/11	06/30/11				170	170	Stipulation	1,500	PLD
51407	MRO	11/03/10	05/05/11				183	183	No Action Taken		0 PLD
53902	WRO	12/09/10	06/30/11				203	203	Stipulation	7,400	PLD
53336	MRO	12/08/10	06/30/11				204	204	Stipulation	3,000	PLD
50860	WRO	10/20/10	06/30/11				253	253	Stipulation	3,000	PLD
49094	MRO	08/20/10	06/30/11				314	314	Stipulation	2,787.5	PLD
48934	MRO	08/18/10	06/30/11				316	316	Stipulation	500	PLD
47459	MRO	07/12/10	05/26/11				318	318	Stipulation	16,000	PLD
43036	WRO	03/16/10	05/02/11				412	412	No Action Taken		0 PLD

Average Day: 98

PLD-1 4.a Does the folder contain the sanction summary?

26606	Y	
51407	n/a	returned
64338	n/a	returned
29344	N	
34715	n/a	returned
88513	n/a	returned
94625	n/a	returned
83440	n/a	stipulation
64515	Y	
50860	n/a	stipulation
26768	Y	
40255	Y	
64343	n/a	returned
62947	n/a	returned
33367	N	

PLD-1 9.d If the decision is to not continue enforcement, PLD closes the enforcement folder and indicates reason in notes tab in ECM?

51407	Y
64338	Y
34715	Y
88513	Y
94625	Y
64343	Y
62947	Y

PLD-1 Notes tab completed and up to date?

26606	Y	should notes consist on things relating to the case or concerning work for the case or both.
26768	Y	
33380	Y	
34076	Y	excellent notes
34715	Y	
41117	Y	

PLD-1 Step 6.a If the respondent accepts stipulation, did PLD record acceptance date, penalty, and sanction?

26572	N/A	rejected stip
47459	Y	Folder improperly closed
50860	Y	
62353	N	
63181	Y	Subflows added to workflow
65041	Y	
65603	Y	
83440	Y	
65072	Y	
53902	Y	

PLD-1 Step 7 Was public press release of court settlement issued?

26572	Y	
47459	N	Since folder was closed improperly press release task never was issued.
50860	Y	
62353	Y	
63181	Y	
65041	Y	
65603	Y	
83440	Y	
65072	Y	
53902	Y	

PLD-1 Step 6.a If stipulation or enforcement, was sanction tab completed?

26572	Y
47459	Y
50860	Y
62353	Y
63181	Y
65041	Y
65603	Y
83440	Y
65072	Y
53902	Y

PLD-1 Step 8 Was type of case identified in OGC tab?

29439	Y
26341	N
65603	N
53336	N
49094	N
62067	N
48934	N
62353	N
47459	N
39938	N

PLD/OGC-1 Step 15 All relevant documents (i.e. docket complaint, consent decision, order, etc) scanned and uploaded to folder.

NOTE: Only checked for docket complaint, consent decision, and order

Control #	Document Type	Document Title
26541	N/A	
26606	YES	Documents do not follow naming convention
26768	NO	Consent Decision and order missing
26866	N/A	
29415	N/A	
33367	N/A	
33380	YES	Incorrect naming convention
34076	YES	Incorrect naming convention
34715	NO	Incorrect naming convention
41117	NO	Incorrect naming convention
51407	N/A	
62530	N/A	
62947	N/A	
63249	N/A	
64338	N/A	
64343	N/A	
64755	YES	
65588	N/A	
68226	N/A	
69092	N/A	
69094	N/A	
83440	YES	
88517	N/A	
94617	N/A	
94621	N/A	

PAS Checklist #5 PLD/OGC-1 All tabs completed, all documents scanned (i.e. Case file, Transmittal, Compliant)

NOTE: Only checked for case file, transmittal, complaint, and decision)

Control #	Document Type	Document Title
26541	N/A	
26606	YES	Incorrect naming convention
26768	YES	Incorrect naming convention
26866	N/A	
29415	N/A	
33367	N/A	
33380	YES	Incorrect naming convention
34076	YES	Incorrect naming convention
34715	YES	Incorrect naming convention
41117	YES	Incorrect naming convention
51407	N/A	
62530	N/A	
62947	N/A	
63249	N/A	
64338	N/A	
64343	N/A	
64755	N/A	
65588	N/A	
68226	N/A	
69092	N/A	
69094	N/A	
83440	N/A	
88517	N/A	
94617	N/A	
94621	N/A	