PATCH # 056

DOCUMENT: Federal Field Office and Federal-State Cooperative Market Field Office Review, September 2017

REMARKS: Alternate desk audit procedures to be implemented when the Associate Director of Inspection Operations determines extraordinary circumstances exist that prevent completion of required on-site review and would continue until such time as the Associate Director determines on-site reviews can resume.

BACKGROUND: This guidance addresses challenges with conducting onsite field office review activities during extraordinary circumstances such as pandemics and public health emergencies when travel and close personal contact are restricted. These alternate desk audit procedures provide flexibilities so that required annual field office review activities can continue to ensure SCI’s policies, regulations, procedures and instructions for grading, certification, and overall administration of its programs are implemented and working as intended.

Federal Area Field Office Alternate Desk Audit (ADA) Procedures

Responsibilities

A. Reviewer responsibilities

1. Provide OIC, SAS, or IIC with sufficient advance notice that the field office review will be conducted under the ADA procedures. Additional planning will be required for audit research, document reviews, and office staff phone or virtual meeting interviews.

2. Prepare and submit the Alternate Desk Audit (ADA) Worksheet (Appendix IV) to the OIC outlining the requested documentation and dates to be reviewed for each category. This worksheet will be completed and submitted in advance to allow sufficient time for the field office to prepare and provide requested documents, images and applicable attestation reports.
3. Prepare and submit the Field Office Desk Audit Requirement Compliance Review Results Attestation Report(s) (Appendix V) to the OIC. Attestation reports will be needed for any Review question(s) that cannot be answered remotely. The attester will be a person not directly involved in the process or activity relating to the Review question. For example; required office postings cannot be reviewed remotely, an attestation report will be completed and signed by an employee who is not responsible for maintaining the office postings, attesting that the postings meet the stated requirements.

4. After interviews are conducted and the review of relevant documentation submitted is completed, identify and document findings as outlined in the Responsibilities section of this manual under Field Office Reviewer, Federal, letter C.

5. After interviews are conducted and the review of relevant documentation submitted is completed, identify and document the findings and categorize into (1) positive findings, (2) non-conformances, and (3) observations.
   - Custodial Activities pertaining to USDA Contracts for Area Office reviews will be evaluated separately by HQ Inspection Operations. The USDA Contracts related questions on the Federal Field Office Review report will be completed by the HQ Inspection Operations reviewer at the time of this review.
   - Determine if there are non-conformances of a serious nature which need to be immediately elevated to the attention of the RBC or Associate Director of Inspection Operations and, if so, notify same.
   - Document the non-conformances that affect the ability of SCI to achieve its stated quality objectives.

6. Conduct a telephone or virtual meeting conference exit briefing of all findings with the OIC, SAS, or IIC as deemed appropriate by the reviewer.

7. Refer to the current policies for completing the Federal Field Office Review and complete the SC-398 Field Office Review report normally.
B. Field Office Responsibilities

1. Coordinate with the reviewer to determine a sufficient timeframe necessary for gathering requested documentation, determining points of contact, completing documentation reviews and attestation reports.

2. The OIC, SAS, or IIC are responsible for completing the Alternate Desk Audit (ADA) Worksheet (Appendix IV) and providing all the requested information and documentation.

   Required information and documentation are as follows:
   
   • Identify responsible field office staff point of contact for interviews
   • Provide the specific documents for those date ranges requested by the reviewer for evaluation of compliance with the requirements
   • Provide completed applicable attestation report(s)
   • Provide applicant contact information for customer feedback

3. Submit proposed corrective actions for all non-conformities within 15 business days of receipt of the review report.

4. Initiate all approved corrective and/or preventive actions.
APPENDIX IV – ALTERNATE DESK AUDIT (ADA) WORKSHEET

Electronic version of Alternate Desk Audit (ADA) Worksheet

This PATCH represents official guidance. This PATCH is scheduled to be incorporated into the document listed on the first page. After incorporation into the document listed above this PATCH will become obsolete.

PATCH #056 Alternate Field Office Review Desk Audit Procedures (July 13, 2020)
SCI Division Management Series
Page 4 of 5
APPENDIX V – FIELD OFFICE DESK AUDIT REQUIREMENT COMPLIANCE REVIEW RESULTS ATTESTATION REPORT

Electronic version of Field Office Desk Audit Requirement Compliance Review Results Attestation Report

<table>
<thead>
<tr>
<th>FIELD OFFICE LOCATION</th>
<th>DATE REVIEW COMPLETED</th>
</tr>
</thead>
<tbody>
<tr>
<td>REQUIREMENT NUMBER</td>
<td>NON-CONFORMITY FOUND (YES/NO)</td>
</tr>
<tr>
<td></td>
<td>COMPLIANCE REVIEW RESULTS</td>
</tr>
<tr>
<td></td>
<td>Detail review procedures and results documenting any non-conformances and observations include applicable document(s) titles reviewed, date range(s), visually verified, description of non-conformity, if found.</td>
</tr>
</tbody>
</table>

By signing below on this date, I am attesting that I have personally reviewed and verified field office conformance with the requirement item number(s) listed above as detailed and identified in the SC-398 Field Office Review report and that the results of this review are shown above and are true and accurate.

PRINTED NAME OF ATTESTER: ___________________________  DATE SIGNED: ___________________________

SIGNATURE OF ATTESTER: ___________________________  

Federal Field Office and Federal-State Cooperative Market Field Office Review  USDA is an equal opportunity provider, employer, and lender.

This PATCH represents official guidance. This PATCH is scheduled to be incorporated into the document listed on the first page. After incorporation into the document listed above this PATCH will become obsolete.

PATCH #056 Alternate Field Office Review Desk Audit Procedures (July 13, 2020)  
SCI Division Management Series  
Page 5 of 5