FOREST PRACTICES FIELD AUDITS

FINAL WORK PLAN

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PURPOSE

Forest Practices Division (FPD) is coordinating a series of field audits. Purpose of the field audits is to evaluate delivery of the Forest Practices program at the region level, leading to improved consistency where needed.   Audit results may lead to programmatic and/or region-specific adjustments.

GOALS

The field audits will examine four aspects of program delivery:

Operations.--determine whether the region is properly implementing key aspects of the Forest Practices (FP) Act and Rules, following the rules, guidance provided in the FP Board Manual, and written guidance provided by FPD.

External Relations.--evaluate the quality of the region's communications and working relationships with the regulated community, sister agencies, local governments, Indian Tribes, and stakeholder organizations.

Program Leadership within the Region.--evaluate priority setting, decision making, problem solving, delegation of authority, coaching, and other leadership characteristics of the Region Manager, the Assistant Region Manager for Resource Protection and Services (RP&S Assistant), and the FP District Manager (DM).

Forest Practices Division Support.--determine whether the region has the programmatic guidance, personnel, equipment, ability to travel, and ability to train and develop personnel that it needs to successfully deliver the program.

These four program aspects will be examined in cycles: Operations will first be evaluated in each region, then External Relations, then Program Leadership, then Division Support.

CYCLE 1. OPERATIONS

KEY QUESTIONS

O1.   Are Forest Practices Applications (FPAs) complete when approved?
O2.   Are FPAs being correctly classified?
O3.   Are pre-approval site visits carried out when the need for such a visit is suggested by the FPA?
O4.   Are interdisciplinary teams (ID Teams) operated according to established procedures?
O5.   Is confidentiality of sensitive data maintained during application processing?
O6.   Are applications conditioned as needed to safeguard public resources?
O7.   Are applications processed in a timely manner?
O8.   Are leave areas being documented?
O9.   Are post-approval site visits carried out to ensure compliance?
O10. How is compliance effort being allocated among FPAs and operators?
O11. Are informal conferences, notices to comply (NTCs), and stop work orders (SWOs) being used appropriately to achieve compliance?
O12. Is appropriate, timely enforcement action taken when public resources are damaged during the course of an FPA?
O13. Are application processing, compliance, and enforcement decisions made equitably and consistently among the region FP staff, and for different applicants?
O14. Are there any FP Rules that the region staff is not attempting to enforce?
O15. Are reforestation checks being done?
O16. Are required meetings between landowners and Indian Tribes verified and documented?
O17. Are perennial initiation points (PIPs) being identified on the ground?
O18. Is work scheduled in road maintenance and abandonment plans (RMAPs) in an even-flow manner?

APPROACH AND METRICS

O1.   <u>Approach</u>: Using the Forest Practices Application Review System (FPARS), FPD will randomly select a sample of 20 FPAs (15 Class III, 5 Class IV-Special) approved during calendar year 2005. The FPA numbers will be given to the region FP Coordinator when the audit team arrives in the region, and the FPA files will be pulled for inspection. Two audit team members (FPD Region Support Specialist, FP Coordinator) will independently examine each FPA, share their opinions, and determine whether the FPA was complete when approved. This determination is a judgment call by the audit team.
       <u>Metrics</u>: Numbers of complete and incomplete FPAs.

O2.   Approach: Two audit team members (FPD Region Support Specialist, FP Coordinator) will independently examine each FPA sampled for O1, share their opinions, and determine whether the FPA was correctly classified. This determination is a judgment call by the audit team.
Metrics: Numbers of correctly and incorrectly classified FPAs.

O3.   Approach: Two audit team members (FPD Region Support Specialist, FP Coordinator) will independently examine each FPA sampled for O1, share their opinions, and determine whether a pre-approval field visit should have been carried out. This determination is a judgment call by the audit team. Their conclusions will be compared to documentation that indicates whether a pre-approval field visit was actually carried out.
Metrics: Numbers of FPAs where a pre-approval field visit should/should not have been carried out (in the judgment of the audit team) vs. numbers of FPAs where a pre-approval field visit was/was not actually carried out, displayed as a 2 x 2 matrix.

O4.   Approach A: One audit team member (FP Coordinator) will examine each FPA in the O1 sample for which an ID Team was convened. If the O1 sample contains fewer than 5 FPAs for which an ID Team was convened, additional FPAs involving ID Teams will be drawn (up to a total of 5) from a list of 30 additional, randomly selected Class III and Class IV-Special FPAs approved during calendar year 2005, generated by FPD. The FP Coordinator will note: 1) number of team members, and whether essential and non-essential team members were differentiated, 2) whether key issues were documented, 3) whether the team's recommendations were documented, and 4) whether DNR's decisions were documented with respect to the team's recommendations.
Metrics A: Numbers of FPAs where: 1) numbers of team members, and numbers of FPAs where essential and non-essential team members were/were not differentiated, 2) numbers of FPAs where key issues were/were not documented, 3) numbers of FPAs where the team's recommendations were/were not documented, and 4) numbers of FPAs where DNR's decisions were/were not documented with respect to the team's recommendations.
Approach B: Two audit team members (FPD ADM for Operations, FP DM) will interview the RP&S Assistant, the FP DM, the FP Coordinator, the RMAP Specialist, and each FP forester. They will ask each person they interview, *What are the region's criteria for determining whether to convene an ID Team? What changes need to occur in your region (either inside or outside DNR) to improve outcomes of the ID Team process?*
Metrics B: documented interview responses.

O5. Approach: Two audit team members (FPD ADM for Operations, FP DM) will interview the RP&S Assistant, the FP DM, the FP Coordinator, the RMAP Specialist, and each FP forester. They will ask each person they interview: *What is the region's standard practice for ensuring confidentiality of sensitive information during FPA processing? Is this working well? If not, how could this practice be improved?*
Metrics: documented interview responses.

O6. Approach: Two audit team members (FPD Region Support Specialist, FP Coordinator) will independently examine each FPA sampled for O1, share their opinions, note whether the FPA was conditioned, and determine whether the FPA was appropriately conditioned. This determination is a judgment call by the audit team.
Metrics: Numbers of FPAs conditioned/not conditioned. Numbers of FPAs appropriately/inappropriately conditioned (in the judgment of the audit team).

O7. Approach: One audit team member (FPD Region Support Specialist) will examine each FPA sampled for O1 and determine the time between FPA received and FPA approved/disapproved.
Metrics: Numbers of days between FPA received and FPA approved/disapproved, by FPA class.

O8. Approach: Two audit team members (FPD ADM for Operations, FP DM) will interview the RP&S Assistant, the FP DM, the FP Coordinator, and each FP forester. They will ask each person they interview: *Does the region document leave areas anywhere other than on the approved FPA? If so, how is this being done? If so, does this system adequately safeguard against the possibility that harvest of a leave area could inadvertently be approved at some future time, as part of another FPA? If not, how could this system be improved?*
Metrics: documented interview responses.

O9. Approach: One audit team member (FPD Region Support Specialist) will examine each FPA sampled for O1 and determine whether a post-approval field visit was carried out, and whether results of the visit were documented.
Metrics: Numbers of FPAs where a post-approval field visit was/was not carried out, by FPA class. For FPAs where a post-approval visit was carried out, numbers of FPAs where results of the visit were/were not documented.

O10. Approach: Two audit team members (FPD ADM for Operations, FP DM) will interview the RP&S Assistant, the FP DM, the FP Coordinator, and each FP forester. They will ask each person they interview: *What is the region's system for allocating compliance effort among FPAs and operators, and ensuring accomplishment of the region's compliance deliverables? Could this system be improved? If so, how?*
Metrics: documented interview responses.

O11. Approach: Using the enforcement database, FPD will randomly select 5 violation NTCs (VNTCs), and 5 SWOs issued during calendar year 2005. If there are fewer than 5 of either of these types of actions, all of that type of action will be selected. Two members of the audit team (FPD ADM for Operations, FP DM) will examine each VNTC and SWO, cross-reference the action to all information in the FPA file, share their opinions, and determine whether the action taken was appropriate to the situation. This determination is a judgment call by the audit team.
Metrics: Numbers of VNTCs and SWOs that were/were not the appropriate enforcement action (in the judgment of the audit team).

O12. Approach: Using the enforcement database, identify all civil penalties issued by the region during calendar years 2004 and 2005. One audit team member (FPD Region Support Specialist) will inspect each civil penalty and its associated FPA file, and calculate the time between violation discovered and civil penalty issued. Two members of the audit team (FPD Region Support Specialist, FP Coordinator) will independently review the civil penalty calculation, cross-reference the calculation against all information in the FPA file, share their opinions, and determine whether the calculated penalty amount was appropriate. This determination is a judgment call by the audit team.
Metrics: Number of days between violation discovered and civil penalty issued. Numbers of civil penalties amounts appropriately/inappropriately calculated (in the judgment of the audit team).

O13. Approach: Using FPARS, calculate the proportion of FPAs reviewed during calendar year 2005 that were approved, for the region and for each FP forester. Using the enforcement database, calculate numbers of VNTCs, SWOs, notices of intent to disapprove (NOIDs), and civil penalties issued during calendar year 2005, for the region, for each FP forester, and for each landowner or operator that received at least 2 of these actions. These calculations will be done by FPD staff.
Metrics: Ratio of FPAs approved to FPAs reviewed for the region, and for each FP forester. Ratios of VNTCs, SWOs, NOIDs, and civil penalties to FPAs approved, for the region, for each FP forester, and for each landowner or operator that received at least 2 of these actions.

O14. Approach: Two audit team members (FPD ADM for Operations, FP DM) will interview the RP&S Assistant, the FP DM, the FP Coordinator, the RMAP Specialist, and each FP forester. They will ask each person they interview: *Are there any FP rules that the region is not attempting to enforce? If so, which rules, and why?*
Metrics: documented interview responses.

O15.   Approach: Two audit team members (FPD ADM for Operations, FP DM) will interview the RP&S Assistant, the FP DM, and each FP forester. They will ask each person they interview: *How frequently is the region doing reforestation checks? Do you feel this level of checking is adequate?*
Metrics: documented interview responses.

O16.   Approach: Using FPARS, FPD staff will randomly select 10 FPAs involving cultural resources that were approved during calendar year 2005. If the region approved fewer than 10 FPAs involving cultural resources, all will be selected. One audit team member (FP Coordinator) will examine each FPA file to determine whether the required meeting between the landowner and the affected Indian Tribe was documented as having taken place.
Metrics: Numbers of FPAs involving cultural resources where the required meeting between the landowner and affected Indian Tribe was/was not documented as having taken place.

O17.   Approach: Two audit team members (FPD ADM for Operations, FP DM) will interview the RP&S Assistant, the FP DM, and each FP forester. They will ask each person they interview: *Estimate what proportion of perennial initiation point involved with FPAs in your area are located on the ground vs. assigned using the default basin size? Do you feel that landowners are making a good effort to locate PIPs on the ground whenever possible?*
Metrics: documented interview responses.

O18.   Approach: Two audit team members (FPD Region Support Specialist, FP Coordinator) will randomly select 5 completed, approved, large landowner RMAPs. They will independently review the work schedule in each plan, share their opinions, and determine whether work was scheduled in an even-flow manner. This determination is a judgment call by the audit team.
Metrics: Numbers of completed, approved, large landowner RMAPs where work was/was not scheduled in an even-flow manner.

In addition to interview questions related to the key audit questions, each person interviewed will be asked to share additional thoughts on FP operations in the region. This input will provide further insights to program delivery, and may lead to refinements in the audit plan.

AUDIT TEAM

The audit team for each region will be comprised of 4 members: the FPD ADM for Operations, an FPD Region Support Specialist not assigned to the region that is being audited, an FP DM from another region, and an FP Coordinator from another region. The FDP ADM for Operations will serve as audit team leader, and will resolve any differences of opinion among team members. The FP DM and the FP Coordinator will always be from different regions. Audit team assignments are detailed in Table 1.

SCHEDULE

Each audit will be completed within a span of 30 calendar days. Within 10 days of completion, the audit team leader and the FPD Division Manager will travel to the region to brief the Region Manager and the RP&S Assistant on audit results, and discuss recommendations. Audits will be conducted according to the following schedule. Audit dates are detailed in Table 1.

Day 1:
0900-1000   audit team conference call: audit team leader (FPD ADM for Operations) and FPD Division Manager answer questions from team members.

Day 2*:
morning   audit team travels to region (distant team members will travel on the preceding day if necessary)
1200-1300   audit team lunch meeting, team members review their roles and responsibilities
1300-1400   audit team meets with region management and the region FP staff to explain audit approaches and schedule interviews, region management shows the audit team to the areas in which the team will work, logistics are addressed
1400-1700   audit team begins to gather information
*note: at the audit team leader's discretion, and in coordination with the region, the Day 2 schedule may be adjusted for an earlier start if it is possible for all audit team members to arrive in the region by mid-morning

Day 3:
0800-1700   audit team continues to gather information

Day 4:
0800-1100   audit team finishes gathering information
1100-1130   audit team meets with region management and the region FP staff to hear closing thoughts and to explain how the audit will be completed, audit team leader schedules date/time within days 35-39 to return to region with the FPD Division Manager to brief the Region Manager and the RP&S Assistant on audit results and discuss recommendations
1130-1200   audit team wraps up its work in the region, audit team leader reviews team members' information compiling and writing assignments and deadlines
afternoon   audit team travels home

Day 14:
- audit team members submit completed information compiling and writing assignments to team leader
- division staff submits compiled O13 information to audit team leader

Day 21:
- audit team leader submits completed draft audit report to team members for review

Day 24:
- audit team members complete review of draft report and return comments to team leader

Day 30:
- audit team leader submits completed final audit report to FPD Division Manager

Day 35-39:
- audit team leader and FPD Division Manager travel to region to brief Region Manager and RP&S Assistant on audit results and discuss recommendations

Results of region-specific Cycle 1 audits will be synthesized in a final report. The synthesis report will be presented at the Region Managers December 6, 2006 monthly meeting, and the first 2007 Top and Assistant Management meeting. The RP&S Assistants will participate in the December 6, 2006 briefing. This plan will be updated and expanded in December 2006, to guide implementation of Cycle 2, External Relations. Cycle 2 will be implemented in January 2007.

LOGISTICS

Participation in Audit Teams.--Region and division management will arrange workloads and work schedules so that audit team members can successfully fulfill their audit roles and responsibilities, per this plan. Audit team members who are not fire team members will not be dispatched to a fire when a dispatch request conflicts with audit team duties. Audit team members who are fire team members will be excused from their audit team duties, and replaced, if a conflict arises because the fire team is dispatched.

Equipment.--Audit team members will be equipped with a laptop computer by their home work units, for use during the audit.

Work Areas.--In the regions, the audit teams have two primary requirements: a room in which to conduct interviews, and a separate work area in which to review FPA files, compile data, and discuss findings. The interview room will be situated such that interviews can be conducted without disruption and in confidence, i.e., a quiet, secluded area or a fully enclosed room with a door. The second work area will be of sufficient size that 4 people can spread out files and papers, operate laptop computers, and converse without disrupting region employees; an approximate 24 square foot surface with a nearby electrical outlet is adequate. Additionally, the team will have access to a photocopy machine and a SCAN telephone.

Access to Region FP Staff.--Region management will arrange work schedules so that the region FP staff is available for the introductory and exit meetings, and for interviews.

Costs.--The FPD Division Manager, the FPD ADM for Operations, RP&S Assistants, and FP District Managers will charge time spent on the audit, travel costs, and miscellaneous expenses to program index 250 (division administration). FP Coordinators, RMAP Specialists, FP Foresters, FPD Region Support Specialists, and other audit participants will charge time spent on the audits, travel costs, and miscellaneous expenses 70% to program index 254 (Forest Practices Application Approval Process) and 30% to program index 255 (Compliance/Enforcement). An incident code will be assigned to each audit to help track costs.

Table 1. Forest Practices Field Audits, Cycle 1 - Operations: Audit Team Assignments and Schedules.						
Region:	Northwest	Olympic	Northeast	Pacific Cascade	South Puget	Southeast
Audit Team						
FPD ADM for Operations:	Gary Graves	Gary Graves	Gary Graves	Gary Graves	Gary Graves	Gary Graves
FP District Manager:	Ben Cleveland	Bob Anderson	Julie Sackett	Joe Blazek	Jim Springer	Al McGuire
FPD Region Support Specialist:	Jeff Galleher	Sue Casey	Marcus Johns	Kathy Murray	Donelle Mahan	Marcus Johns
FP Coordinator:	Jill Jones	Andrew Skowland	Charlie McKinney	Dave Cole	Rex Hapala	Julie Oliver
Schedule						
Audit Team Conference Call:	Jan 24	Mar 21	May 2	Jun 13	Jul 25	Sep 19
Audit Team in Region:	Jan 25-27	Mar 22-24	May 3-5	Jun 14-16	Jul 26-28	Sep 20-22
Assignments to Team Leader:	Feb 6	Apr 3	May 15	Jun 26	Aug 7	Oct 2
Draft Report to Team for Review:	Feb 13	Apr 10	May 22	Jul 3	Aug 14	Oct 9
Comments Back to Team Leader:	Feb 16	Apr 13	May 25	Jul 6	Aug 17	Oct 12
Final Report to FP DM:	Feb 22	Apr 19	May 31	Jul 12	Aug 23	Oct 18
Briefing for Region Management:	Feb 27 - Mar 3	Apr 24-28	Jun 5-9	Jul 17-21	Aug 28 - Sep 1	Oct 23-27