

PART 381 – Client Signatures on O&M Plans

Subpart A – Client Signatures on Operation and Maintenance Plans, Construction Drawings, and Implementation Requirements

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381.0 Purpose

Inform staff of policy in reference to documenting client review and acceptance of operation and maintenance plans, construction drawings, and implementation requirements.

381.1 Background

- A. During an Area Quality Assurance Review (QAR), some engineering Operation and Maintenance (O&M) Plans that were reviewed lacked the client signature. Iowa NRCS engineering O&M Plans have a client signature line to document that the client participated in a review of the O&M Plan. In response to this finding, there was an inquiry as to whether the client signature is required by policy.
- B. A second related inquiry was made in reference to the client signature block printed on construction drawings. The Cover Sheet developed for the Iowa NRCS Autodesk Civil 3D drawing template has a signature block for the landowner to certify that, “I have reviewed and agree with the content of the plans and specifications prepared by the NRCS”. The inquiry was made to determine if NRCS policy requires the landowner signature as a precondition for NRCS construction technical assistance.
- C. Another related inquiry was made in reference to the client signature block on implementation requirements (IRs) for Ecological Sciences conservation

practices, and the need for consistency between Engineering and Ecological Sciences signature requirements. IRs developed in 2020 and later included a Producer Acknowledgement signature block for the producer to certify that, “I have reviewed all specifications and agree to install as specified.” The inquiry was made to determine if NRCS policy requires the producer signature.

- D. A state office action item from the QAR was to investigate policy regarding the O&M Plan, Construction Drawing, and IR signature requirements.

381.2 O&M Plans

- A. Operation and Maintenance policy is found in Title 180, National Operation and Maintenance Manual (NOMM), Part 500, “Operation and Maintenance.” Section 500.10B states, “O&M requirements shall be discussed and agreed to with the sponsor/land user during the planning process. Written O&M requirements shall be provided to the sponsor/land user prior to the installation of the practice.” Therefore, policy requires:
 - 1. NRCS discuss the O&M requirements with the landowner;
 - 2. NRCS and the landowner agree to the O&M requirements; and
 - 3. **NRCS provides the written requirements to the landowner prior to installation of the practice.**
- B. Policy does not require the client’s signature on the O&M Plan. The O&M Plan is a required component of the NRCS case file (Title 180, National Planning Procedures Handbook (NPPH), Part 600 “National Planning Procedures Handbook,” Section 600.31).
- C. Documenting that the O&M Plan was discussed and agreed to is part of conservation assistance notes which are a required component of an NRCS case file (180 NPPH §600.31). This should be accomplished using NRCS-CPA-6, Conservation Assistance Notes. When using this form, staff certify and date that the O&M Plan was reviewed with the client who understood and accepted the O&M Plan. While the policy does not require the client to sign the O&M Plan, the client’s signature or initials may be obtained on the O&M Plan if the client is readily available. When this occurs the certification in the Conservation Assistance Notes is not necessary.
- D. The O&M plan templates for engineering practices in Field Office Technical Guide (FOTG) will be updated over time to reflect that the signature is optional and that staff may use NRCS-CPA-6 for documentation.

381.3 Construction Drawings

- A. Construction drawings and specification policy is found in Title 450, General Manual (GM), Part 401, Subpart B, Section 401.20 and in Title 210, National Engineering Manual (210-NEM), Part 511, Subpart A, Section 511.8 and Part 541 “Drafting and Drawings.” After reviewing this policy, it was determined that no

policy requires a client signature on the construction drawings or other construction documents.

- B. It is recommended that staff certify and date that the construction drawings and specifications were reviewed with the client by staff with appropriate JAA, and that the client consented to implementing the construction drawings and specifications prior to construction. Documentation of this certification in the NRCS case file may be completed using NRCS-CPA-6. Staff may obtain the client signature and date on the construction drawings when the client is readily available.
- C. Each engineering Statement of Work (SOW) will be updated over time to remove the client signature requirement on the construction drawings. The signature block will be removed from the Iowa NRCS Civil 3D template Cover Sheet when it is next updated.

381.4 Implementation Requirements

- A. Implementation Requirements policy is found in 450-GM-401. Section 401.3C4(i) states “The following conservation practice content must also be included. This content may be recorded in its own specific document(s) or included in other practice documents: Implementation Requirements (IRs). State-approved templates used to develop site-specific implementation instructions for a conservation practice. Primary users are NRCS employees, partners, TSPs, and private consultants who customize conservation practice information for each site, for the purpose of information transfer to clients, operators, their employees, or others who physically implement the practice. Implementation requirements content may be included in the other documents in lieu of its own separate document.”
- B. Policy does not require the client’s signature on the IR. The IR is a required component, as applicable, of the NRCS case file (180 NPPH §600.31).
- C. Documenting that the IR was discussed and agreed to is part of conservation assistance notes which are a required component of an NRCS case file (180 NPPH §600.31). This should be accomplished using NRCS-CPA-6, Conservation Assistance Notes. When using this form, staff certify and date that the IR was reviewed with the client who understood and accepted the IR. While the policy does not require the client to sign the IR, the client’s signature or initials may be obtained on the IR if the client is readily available. When this occurs the certification in the Conservation Assistance Notes is not necessary.
- D. The IR plan templates for ecological sciences practices in the FOTG will be updated over time to reflect that the signature is optional and that staff may use NRCS-CPA-6 for documentation.