



**COMPREHENSIVE LIVESTOCK AND ENVIRONMENTAL
ASSESSMENT AND NUTRIENT MANAGEMENT PLANS
(CLEANmp) PROGRAM**

SERVICE PROVIDER GUIDANCE

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1. Introduction

This document is intended to provide Comprehensive Livestock Environmental Assessment and Nutrient Management Plan West (CLEANmp) Program service providers guidance on conducting CLEANmp projects. There are three types of CLEANmp projects: environmental assessments (EA), nutrient management plan (NMP) development or revision, and a combined project consisting of an EA and NMP. This document begins with a general introduction followed by sections detailing guidance for the specific phases of a CLEANmp project. These phases are: Preparing for a CLEANmp Project, On-Farm Portion of a CLEANmp project and Reporting. The bulk of the guidance is targeted at service providers involved with EA projects; however, the information, suggestions and guidance also are applicable to NMP projects.

All three of the CLEANmp projects will address both strengths and challenges observed at a production facility. Strengths, challenges, and recommendations for addressing the challenges will be identified in the associated CLEANmp report. The economic, social, and scientific impact of challenges on producer operations should be considered and discussed in the final report. By providing this service to producers, the overall environmental stewardship of livestock and poultry production in this country will be raised. This program is designed to minimize the impact of livestock and poultry production on watersheds and air quality. Follow-up evaluations will be conducted to see if this program is meeting these goals.

The *Application and Preliminary Information Survey* that a producer fills out to request a CLEANmp project is provided to service providers prior to conducting a CLEANmp project. Producer confidentiality must be protected to the fullest extent of the law. Extra copies of assessment-related documents must be treated as confidential business information. Any notes or copied documents that are not part of CLEANmp data collection forms, or the final EA or NMP report must be destroyed when they are no longer needed. If the information has been used to support observations or recommendations in the EA report or NMP, a copy of the information must be forwarded to SES, along with the original data collection forms and EA and/or NMP reports. A service provider must keep a copy of the report and supporting documentation for a period of **30 days** after the project documents have been submitted to SES. These requirements are described later in this document and in CLEANmp Program Documents posted on the program's website. After this period, a service provider must destroy their copies of the associated CLEANmp project documents. **Any inquiries for CLEANmp project or program information, not directly posed by the producer, must be directed to SES.**

Weather conditions should never cause an EA or NMP site visit to be canceled; however, weather could cause a site visit to be postponed. Once on site a service provider must decide if weather conditions will compromise the thoroughness of the on-farm portion of the project. If poor weather conditions are anticipated ahead of time, then the site visit should be postponed. Some examples of these situations are: (1) snow cover, (2) heavy rain, and (3) extreme temperatures. All of these conditions could make it difficult to conduct a thorough assessment of the outdoor aspects of the operation, specifically around the buildings, outdoor manure storage structures, land application areas, and the mortality disposal area.

Disease prevention is typically a concern raised by the producer. If an operation has a disease outbreak after the assessment is scheduled but before it is performed, the producer may call the assigned service provider to have the farm visit rescheduled. It is important to work with the producer and reschedule the assessment at his or her convenience.

There may be occasions when a farm visit is scheduled for a time when all the buildings are unstocked. If this occurs for a new operation, the service provider should wait until the buildings are stocked to determine how the operation is managed. For an existing operation that is between cycles, there may still be merit for conducting the farm visit. For example, if some of the buildings have been cleaned and others have not, it will allow an assessment of the cleanliness of the buildings at the end of a production cycle and an assessment of the cleaning procedures used. If all the buildings have been cleaned, the assessment of the buildings will have limited usefulness because typical conditions of production will not be seen.

CLEANmp service providers have basic professional requirements that must be met and maintained in order to become an approved service provider. While these requirements focus on technical capabilities, registrations and experience; another and equally important characteristic of a service provider addresses his or her interpersonal skills relative to working with producers to collect data. The following list gives examples of behaviors strongly discouraged for CLEANmp service providers:

- Desk jockey** All facts with no real experience.
- What-can-you-do-for-me** “I have a business opportunity for you,” professors wanting research opportunities, or marketing your services.
- Know-it-all** Discounts producer’s experiences or opinions, poor listener.
- Nit-picker** Gets caught up with minor details, taking focus away from major challenges.
- Nice guy** “I am your friend,” hesitant to critically assess operation, short-changes the producer and the program.
- Out of his or her field** “I have no clue what you are talking about,” looks to the producer for guidance, or he or she is unsure of challenges or recommendations.

A professional rapport will increase the service provider’s credibility and establish the objective nature of the data collection activity (e.g., it is not a “gotcha” exercise). This should increase the facility representative’s comfort level about cooperating with the data collection process.

A CLEANmp NMP project can either develop an NMP for a producer or revise an existing plan. A CLEANmp NMP project is conducted using the CLEANmp NMP Data Collection Tool and existing software packages. The primary nutrient management planning and development tool for the CLEANmp program is Purdue University’s Manure Management Planner (MMP). In those states not supported by MMP, other software tools, such as AFOPro and IdahoOnePlan, may be used with the prior approval of the CLEANmp Project Manager. If no NMP software tools are available for a state, a CLEANmp nutrient management planner can use SES’s in-house templates, Excel spreadsheet tools, and GIS capabilities for the NMP development and review.

A CLEANmp EA is based on the Good Environmental Livestock Production Practices (GELPP), which are American National Standards, ANSI Standards. The GELPPs recognize five primary environmental and odor risk areas associated with livestock and poultry production: (1) general site conditions, (2) livestock living areas (confinement buildings, sheds, lots, and pastures), (3) manure storage areas, (4) manure utilization (land application), and (5) mortality management. The CLEANmp EA data collection form is organized by these five areas.

There is one additional section of the EA data collection tool that does not directly tie to one of the primary risk areas. Section 6 - Exit Interview Findings is a place where service providers record strengths, challenges and recommendations that they identify during an assessment. Service providers are encouraged to fill this out during the on-farm portion of the assessment, as strengths and challenges are observed and discussed.

The service provider and the producer will decide how the on-farm portion of the project will take place during the initial interview, described later in this document. The sequence of events will always include a thorough farm tour with the producer. After the data collection activities are complete, the service provider will review the information in private and formulate preliminary findings. This should take between 15 and 30 minutes. After this, the service provider will conduct an exit interview with the producer.

Throughout the on-farm visit, service providers must remember that they can only assess what they actually observe. All information based on other sources, such as producer comments, must be identified and used with caution in the final report.

2. Preparing for a CLEANmp Project

Preparing for a CLEANmp project requires a service provider to become familiar with the project and initiate contact with the producer. Aside from scheduling the on-farm visit; this phase of a CLEANmp project includes document review, biosecurity considerations, general farm safety and assembling the proper project tools. These preparation considerations are discussed below.

2.1. Document Review

The producer-supplied information (*Application and Preliminary Information Survey Form*) must be reviewed in detail prior to conducting the on-farm portion of the project. The degree of effort made by the producer to provide useful information on the application often gives insight into how seriously the producer views the program. Incomplete or vague responses may indicate an unwillingness to actively participate in the program.

The service provider must review the production and manure-handling summary information provided by the producer to develop an understanding of the entire operation. This will likely require supplemental telephone conversations with the producer. Knowing the type of

production operation and manure-handling procedures will allow the service provider to identify, in advance, any areas of potential risk, and help focus data collection during the on-farm portion of the project.

During the review of the producer-supplied information, service providers should identify any inconsistencies in the information provided in the *Application and Preliminary Information Survey* submitted by the producer. During this document review, a service provider will contact the producer to schedule the on-farm portion of the project and to collect additional information or clarify information supplied on the *Application for Preliminary Information Survey*. Service providers should pay special attention to the attitude of a producer displayed during telephone conversations prior to the on-farm portion of a project. The producer's attitude may give some indication of his or her commitment to the project.

2.2. Biosecurity

Transmission of disease within or between herds can devastate a producer's operation. For example, in 1997 disease transmission wiped out swine production in Taiwan, in 2001 beef production was severely damaged in England, and in 1997 poultry production in Hong Kong was devastated by disease. This list is by no means comprehensive. This list emphasizes the need for service provider biosecurity and the potential industry-wide impact of disease introduction. Violating a producer's biosecurity requirements will result in a service provider being immediately removed from the program.

The four major aspects of livestock and poultry production biosecurity are as follows: isolation (animal-free days), reusable equipment and material (clothing, vehicles, and equipment), shower-in/shower-out, and the order of inspection. All of these aspects are addressed in the Biosecurity Form that the producer submits with a completed *Application and Preliminary Information Survey Form*. A producer's biosecurity requirements **always** take precedence over program guidance or service provider practices. A service provider may **not** implement lesser biosecurity than what a producer requires. A service provider can practice stricter biosecurity, relative to a producer's biosecurity requirements.

1. Isolation refers to controlling contact between a herd or flock and animals from separate herds or flocks. This separation is commonly referred to as animal-free days and addresses the number of days a service provider must avoid contact with certain animal species that could transmit disease to the animals present at the operation undergoing a CLEANmp project. Generally, the minimum number of similar species-free days prior to an on-farm visit is two. If this is **not** specified by a producer in the project application, a service provider must use the program default of two days as the MINIMUM same-species, animal-free days to meet the program's MINIMUM biosecurity requirements.
2. Reusable equipment and clothing can act as a fomite, physically carrying a disease from operation to operation, see Figure 1 on page 6. Only clean clothing should be worn on the on-farm portion of a CLEANmp project. Some facilities will provide clothing for

service providers; this will be noted on the Biosecurity Form submitted with the *Application and Preliminary Information Survey Form*. Items of clothing often overlooked include hats, glasses, wallets, and other personal items. Unless these items can be washed and disinfected prior to the on-farm portion of the project, they should be left in the service provider's vehicle during the on-farm portion of the project. Boots can be a significant mechanism for transmitting a disease. Service providers should wear clean boots or disinfect boots prior to arriving a producer's operation. Leather boots are extremely difficult to clean and disinfect. If a service provider is using leather boots, he or she must use plastic, vinyl or rubber boot covers to isolate the boots from the animals and the general operation during the on-farm portion of the project.

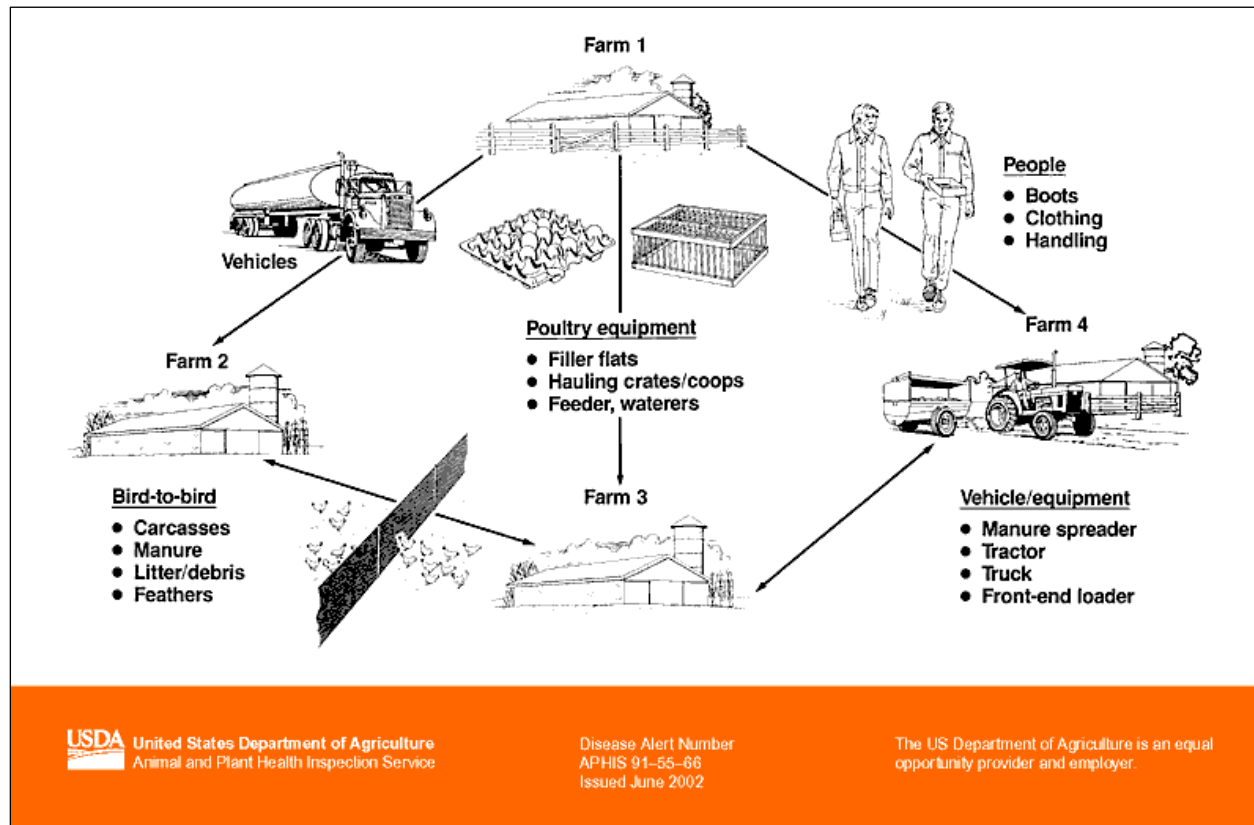
Other reusable equipment, such as clip boards, eyeglasses, compass, etc., must be isolated by placing it in a plastic bag for the duration of the on-farm portion of the project or they must be cleaned and disinfected. Commercially available broad spectrum virucide and bactericide sprays work well for this application. Service providers are cautioned that these sprays may melt or "fog" plastic items. SES assumes no liability for equipment or clothing damaged or destroyed by a service provider's application of biosecurity.

3. Some farms will require service providers to shower upon entering a production site (sometimes even between buildings) and prior to leaving the production site. This type of operation is known as a shower-in and shower-out facility. This type of farm will require additional on-farm project time.
4. The final major aspect of biosecurity involves the order of an inspection, relative to age or production phase. This order generally goes from youngest to oldest. The resulting inspection sequence for swine would be: nursery → farrowing → gestation → finishing; or for a poultry operation: pullet → layer or meat bird (broiler). This sequencing of an assessment only applies to a multi-phase operation. If a producer has a different sequence, a service provider must use the producer's sequence.

A service provider must learn and abide by the biosecurity procedures outlined on the producer's Biosecurity Form submitted with the *Application and Preliminary Information Survey*. The field portion of a project cannot be scheduled if the service provider does not meet the producer's minimum biosecurity requirements. If a service provider does not meet a producer's biosecurity requirements, it is not acceptable to simply limit the service provider's exposure to the animals on a farm. This will not allow a thorough physical evaluation of the entire operation, and many producers consider all portions of the production site covered under the farm's biosecurity protocols, not just the animal living areas. Table 1 on page 7 summarizes some general biosecurity guidelines for the CLEANmp Program.

FIGURE 1 HOW DISEASES SPREAD

(While this diagram focuses on poultry production, the basic concepts of disease transmission apply to livestock.)



2.3. General Farm Safety

The conduct of a CLEANmp project will require a service provider to interact with a producer, tour farm operations and land application fields. Service providers will be exposed to potential safety hazards associated with working around livestock and poultry; slip, trip and fall hazards; as well as safety hazards associated with the equipment used at most livestock or poultry operations. CLEANmp projects may be conducted in a variety of environmental conditions from freezing temperatures to hot humid days. Service providers are cautioned that the physical exertion associated with this work can be significantly increased based on weather and other environmental conditions. Service providers must dress appropriately for the weather and work to be conducted, provide adequate hydration and food (eating should not take place during the on-farm visit and any hydration (water) should be approved by the producer if a service provider wants it available during the farm tour), and be of adequate physical condition to conduct the CLEANmp work without undue risk of injury.

TABLE 1
CLEANmp GENERAL BIOSECURITY GUIDELINES

1. Follow the producer's established "animal-free" separation times. The producer's Biosecurity Form presents these requirements for the operation being visited. Use this information to schedule on-farm portion of the project. As a minimum, limit CLEANmp related on-site visits to one farm or production unit per day. If the operations are under different management, this minimum is an on-farm visit every two days.
2. If several rooms or buildings are being evaluated, schedule the walk-through portion of the project to enter rooms from the youngest to the oldest (i.e., for pigs – nursery, farrowing, grower, finisher, gestation, breeding), unless the producer has a different sequence in mind. Check with the producer for proper procedures.
3. **ALWAYS** wear clean clothes or disposable coveralls (e.g., Tyvek™) will suffice. If shower-in, shower-out procedures are used at the farm, be sure to comply.
4. **ALWAYS** arrive in a clean vehicle. Wash vehicle between farm visits.
5. Disinfect boots upon arrival and before entering the animal production (restricted) area. Wear boot covers (plastic boots) and change them between buildings if necessary. Check with the producers to determine their footwear requirements and if they prefer to supply boots.
6. A respiratory (dust/aerosol) mask may be worn in confinement production buildings for your protection and to reduce dust or aerosol transmission of disease. Check with the producers to determine their requirements and if they supply dust/aerosol masks.
7. Survey instruments, sampling equipment, measurement equipment, and other materials need to be cleaned and disinfected with a broad spectrum virucide and bactericide between farm visits. Check with the producers for proper procedures.
8. Use common sense when visiting a production site.

To remind service providers of general safety considerations, Table 2 is provided as general guidance.

**TABLE 2
FARM SAFETY TIPS**

1.	Do not enter a confined space, such as a deep pit, storage tank, etc.
2.	Obey all warning signs posted around deep pits, lagoons, or other manure storage structures.
3.	Beware of vehicle traffic from equipment like pickup trucks, semi-trailers, tractors, bobcats, feed trucks, manure spreaders, and front-end loaders.
4.	Beware of slip, trip, and fall hazards, including extension cords, wet or manure-coated concrete floors, wet grates, slippery surfaces around deep pits, basins or below-ground tanks, and rotted wood or loose boards in steps, loading docks or other floors.
5.	Wear a dust mask in dusty environments both indoors and outdoors.
6.	Avoid rapidly moving equipment, such as tractor power take-offs, grain augers, feed grinders, mowers, and ventilation fans.
7.	Stay away from any loose wiring or electric fence wiring that may be “live.”

2.4. Service Provider Tools

The type of tools needed to conduct a CLEANmp project will vary with the scope of the project and the type of operation involved. Common tools needed for CLEANmp projects include:

Flashlight	(Allows data collection in low light environments)
Compass	(Allows the service provider to orient facility maps and determine the actual geographic layout of an operation)
Tape measure	(Allows detailed measurements)
Thermometer	(Allows weather monitoring)
Humidity meter	(Allows weather monitoring)
Wind speed indicator	(Allows weather and possible odor migration monitoring)
Smoke tubes	(Allow the monitoring of ventilation patterns)
Infrared thermometer	(Allows the monitoring of motor and other surface temperatures)

A service provider must bring a compass and flashlight to every EA. A compass will be important when correlating the windshield survey information to the on-farm observations. A flashlight will allow assessors to observe conditions in low light situations and to adequately assess under-floor storage. Measuring devices also are useful. However, for gross measurements, including lagoon dimensions or building size, pacing off the distances will provide sufficient accuracy. Finer measurements, such as fan diameters, may require more precise forms of measurement. These tools **must** be cleaned and disinfected between farm visits.

3. On-Farm Portion of a CLEANmp Project

The on-farm portion of a CLEANmp project has five distinct steps:

1. The first step is to assemble the appropriate data collection tools, either tools for a NMP project or an EA. Some CLEANmp projects will include both an EA and NMP data collection.
2. The windshield survey is the second step and it is conducted prior to arriving for the on-farm portion of the project. A windshield survey is a “drive around” the production and land application areas. Surveying these areas will help a service provider understand the overall operation and the environment where the production operations exist.
3. The third step of a CLEANmp project involves the initial on-farm meeting with the producer. This meeting is used to verify producer biosecurity requirements, any producer-supplied information and to begin to collect either EA or NMP-related data that may not be able to be directly observed during the farm walk-through. Service providers should also use this time to review producer records and plans.
4. The on-farm data collection (physical evaluation) is the fourth step and it involves the service provider visually inspecting all production, manure handling, land application, and mortality management areas at a livestock production operation. A service provider must record observations in a descriptive manner. Such notes will be needed to support the final EA report or NMP, and to provide a follow-up team with adequate information to determine the program’s effectiveness. This is true when either potential or actual problems are observed.
5. The final step of the on-farm portion of the project is the exit interview with the producer. This interview is used to summarize the EA findings or NMP-related information for a producer and allow the producer an opportunity to ask the service provider questions.

3.1. Windshield Survey

The windshield survey should be conducted **prior** to the service provider's initial entry onto the farm. The service provider should conduct the windshield survey without the producer, except in certain situations; for example, limited road access for the windshield survey, or a complicated road system necessitating the producer's presence to keep the service provider accurately oriented. Depending on the size of the operation and the extent of land application areas, the windshield survey may take 30 to 60 minutes. This time must be accounted for in planning the on-farm visit. Often the service provider will use this time to plan the structure and implementation of the on-farm data collection, pending producer approval during the initial interview. This also ensures the service provider will be on-site prior to the scheduled site visit time.

The windshield survey should be used by the service provider to develop an understanding of how the production, manure-handling, and land application operations fit into the surrounding environment. The windshield survey also should be used to verify geographic and demographic information provided by the producer in the *Application and Preliminary Information Survey*. As the production site is approached, the service provider should note the aesthetic aspects of the site. "Curb appeal" has a large impact on social aspects of livestock or poultry production.

When a service provider records the weather conditions at the time of the on-farm visit, he or she should record the temperature, humidity, wind speed and direction, lighting, and any other weather aspects that could affect observations, such as percent snow cover. If the weather has the potential of impacting the thoroughness of the data collection (e.g., snow cover or heavy rain) the service provider must indicate, in the EA or NMP report, if the weather impacted the thoroughness of the data collection.

3.2. Initial Interview

The initial interview should be used to establish a rapport with the producer, verify information already supplied, establish how the on-farm data collection will occur, review biosecurity requirements and to review applicable records and other documents.

On some of the large integrated operations, there may be both a farm or production manager and an environmental manager that have responsibility for a farm. Although it is not required, an on-farm visit is typically more effective if both of these production personnel are present during data collection. It is easier for a service provider to have all of his or her questions answered and information is better disseminated to the operation if both production and environmental personnel are present. It is not the responsibility of a service provider to ensure that all affected persons are present nor is it cause for canceling an assessment if they are not; however, it would strengthen the data collection effort and the overall program if the service provider could persuade all affected personnel to be present. This should be addressed when scheduling the on-farm visit.

Regardless of what was discussed during the scheduling call or what information was included in the *Application for Preliminary Information Survey*, a service provider **must** review and verify biosecurity requirements for the production operation during the initial interview. During a CLEANmp project, the service provider is responsible for upholding and meeting the operation's biosecurity requirements.

During the initial interview, service providers will review biosecurity and determine if they need to use facility-provided clothing. This type of clothing will be disposable or facility coveralls (and undergarments, in some cases), boot or boot covers, and smocks or lab-type coats. In some cases, facilities will require hard hats, eye and hearing protection, or some other type of specialized equipment. The need for the service provider to supply any specialized or unusual (non-street clothes) should be thoroughly discussed during the scheduling call, prior to the on-farm visit.

After the brief introductions, a discussion of biosecurity and the CLEANmp data collection process, a service provider should ask the producer if they have any project-related questions prior to beginning the initial interview.

The producer should be asked to explain his or her production and manure-handling operations. The service provider should use this verbal description to verify the information that the producer submitted on his or her *Application and Preliminary Information Survey* and to clarify any confusion or misunderstanding regarding the operation. At the end of this description, the service provider should have a clear picture of the type, size, structure, and operation of the production and manure-handling aspects of the producer's operation.

Since the CLEANmp Program is designed to benefit the producer, a service provider should be sure to ask the producer to identify any problem areas at the farm and any other aspects of the operation where he or she would like specific assistance.

During the initial meeting, the service provider and producer should discuss the records that need to be reviewed during the visit. Doing so during the opening meeting will give the facility staff or producer a chance to assemble the appropriate records. This discussion should be a review of the discussion the service provider had with the facility contact when scheduling the field visit.

Before a service provider tours the operation, he or she should ask the producer if the operations he or she is preparing to observe represent normal conditions. A service provider needs to know if there are any unusual conditions, such as equipment problems or active repairs, or personnel issues, such as absence of key personnel due to sickness. These conditions could impact the data collected. In addition, if the producer indicates that certain areas are "off limits," the service provider must determine the impact of not assessing those areas on the overall validity of the assessment. Generally, if access is restricted, the project should be stopped. Compromising the thoroughness of a CLEANmp project will negatively impact the program. In cases of herd health concerns or quarantines, limiting access may be acceptable.

If a producer is especially uncooperative during the initial interview, then the service provider must decide whether to continue the data collection. If a producer refuses to allow the service provider to review supplemental information or visually assess any of the five risk areas without providing a valid explanation, then the project should be canceled. SES should be notified immediately by telephone, followed up by a written description of the situation and the circumstances of why the project was canceled.

Open and honest communication between the producer and service provider is critical to ensure that a thorough and objective data collection is conducted. In some cases, multiple facility representatives may accompany a service provider on the on-farm portion of the project. A clear line of communication between the service provider and facility representatives is critical to ensure that all necessary data is gathered and that the data is accurate. It is critical to identify the primary facility representative as a follow-up contact for unanswered questions and as a final word on clarifications regarding management practices. The roles and responsibilities of everyone present for the on-farm portion of the project should be established during the initial interview so the service provider will be able to effectively and thoroughly conduct the farm tour and data collection.

The conclusion of the initial interview is a natural place to begin the records and document review portion of the project. This will be of different intensity, depending on whether a producer is having an EA, NMP or both projects conducted. If this is done at the end of the initial interview, the service provider should request that the records remain available so they can be examined at the end of the farm tour.

3.3. Data Collection – Physical Evaluation

The data collection phase of a CLEANmp project also is referred to as the “physical evaluation.” This phase involves the visual evaluation of farm operations, usually conducted during a farm tour. While most service providers have their own style, the following information and guidance is provided to supplement a service provider’s existing knowledge and data collection style.

The on-farm portion (physical evaluation) of the project reveals the impact of the production and manure-handling operations on the farm’s surrounding environment (watershed, groundwater, surface water, etc.) and on local air quality. During the on-farm data collection, it is imperative to keep both types of environmental impact in mind. Odor problems may not be directly observable (smelled) at the time of the data collection, and the service provider will need to consider the potential to generate odor as he or she reviews an operation. Other environmental aspects of the site’s actual impact are likely to be more directly observable; however, a service provider must still consider the operation’s potential to impact the watershed.

CLEANmp service providers are expected to conduct themselves in a professional manner at all times. They should avoid discussions about controversial topics or internal facility politics and they must follow the CLEANmp Code of Conduct while conducting CLEANmp business. The physical evaluation can be conducted at any time during the farm visit. Generally, the

physical evaluation will be followed through to completion once it has been started. In many cases, this is a function of practicality. Either for biosecurity or timeliness issues, it is often impractical or problematic for individuals to come in and out of a facility continuously. It is common for a service provider to re-visit a data collection question (physical evaluation) if he or she feels that there is a data gap in what has already been collected. These data gaps will generally be identified while the service provider is privately reviewing the project findings before the exit briefing with the producer.

A service provider must always be accompanied by a facility representative throughout the on-farm data collection activities. This is important for many reasons. The service provider may have questions for the facility representative during the farm tour and it is critical that a representative be there to answer them. There also are facility security/service provider liability concerns associated with a service provider being unaccompanied during the on-farm portion of the project. Service provider safety and biosecurity concerns can be avoided by having a facility representative accompany the service provider. A facility representative also can point out hazards around the facility that the service provider may not detect on his own.

Service providers may wish to take a quick facility tour prior to starting the physical evaluation. Biosecurity concerns will limit this strategy in production operations. Many producers will not allow free-flow movement between animal housing areas; this is most pronounced in multi-phase operations. If a service provider wants to conduct a quick tour prior to starting the physical evaluation, he or she must obtain permission from the appropriate facility representative.

If there are multiple like-structures or areas, a service provider must follow the following CLEANmp guidance: *Like-Structures Assessment Rule*. This rule is intended as a **minimum** standard. A service provider is responsible for conducting an EA that provides a representative picture of all livestock or poultry production structures, as well as the entire operation and management at a given CEANmp project site. Critical definitions for this rule are presented below.

- **Like-structures** must be of the same design and constructed of the same materials; they may be different sizes. These structures must be managed in the same manner and must be used for the same phase of production. Like structures must employ the same method of ventilation, as well as the same method of manure handling.
- **Visual verification** occurs when a service provider visually observes a structure in a manner that allows him or her to determine that the structure is or is not managed, functioning, or otherwise the same as the structures that they had previously assessed in detail.
- **“Assess in detail”** refers to answering the applicable questions on the CEANmp EA assessment tool.

LIKE-STRUCTURES RULE

1 to 2 like-structures – A service provider must evaluate both structures in detail, answering the applicable CEANmp EA tool questions. When contradictory observations are made in the two structures (one structure is in conformance with the standards but the other is not), the observation resulting in a “NO” answer must be recorded and appropriate notes made in the comment field.

>2 like-structures – A service provider must conduct a detailed assessment on two of the structures, randomly selected, and visually verify the findings in the remaining structures. If the visual verification identifies inconsistencies, then the service provider must continue the detailed physical evaluation of the structures until he or she has an accurate understanding of the environmental and odor strengths and challenges relative to the like-structures. If a service provider notes a condition that would change a “YES” answer to a “NO” answer during the visual verification, the applicable question on the CLEANmp assessment tool must have its answer changed to a “NO” with the appropriate notes made.

Multi-room nursery or farrowing design – If the construction and management systems are the same for all rooms within the building, the Like-Structure rule does not apply to the rooms as if they were individual like-structures. **At a minimum**, a service provider must conduct a detailed physical evaluation of one room meeting the following criteria: 1) newly cleaned or recently stocked, 2) mid-cycle animals, and 3) late-cycle animals. This information must be recorded on a single CLEANmp assessment tool as long as observed differences are noted and attributed to specific rooms. An equal number of rooms, one in each of the three categories must be visually verified. If the visual verification identifies inconsistencies, then the service provider must continue its assessment of the rooms until he or she has an accurate understanding of the environmental and odor strengths and challenges relative to the like-structures.

If there are several like-structures containing these multi-room arrangements, then the Like-Structures Rule does apply to the buildings.

Where all portions of a structure or area cannot be observed (in detail) from a single point, a service provider must walk through or around the structure or area being physically evaluated.

A service provider must visually inspect each non-like structure or area. These structures might include older production buildings that incorporate different manure management approaches, land application areas that have the potential to impact surface water, composting areas, mortality storage, etc. A service provider must fill out the appropriate sections of the applicable data collection form for each of these areas.

If a visual inspection of a structure, piece of equipment, or area is not possible, document why and consider the impact on the validity of the entire project. Generally, if access is restricted, the project should be stopped. However, equipment may not be maintained at the farm, making

inspection impossible in some cases. In cases of herd health concerns or quarantines, limiting access may be acceptable. When in doubt, a service provider should contact the program administrator (SES) for guidance.

If the land application equipment is accessible, it **must** be inspected. This may not be possible if a custom applicator is contracted by a farm. An explanation must be provided in the data collection forms if the land application equipment was not inspected.

During the initial interview, the service provider will have reviewed the land application information submitted on the *Application and Preliminary Information Survey* form and any maps or supplemental information provided by the producer, and identified areas with potential to impact surface water. These areas **must** be visually assessed, even if the project does not include the development of a NMP. For an EA, the physical evaluation must focus on the area of potential impact to surface water and areas that are prone to application odor complaints or that the service provider feels may have the potential to cause an odor complaint (proximity issues).

Challenges identified for an EA risk area should not reflect “operational reality.” Operational reality does not excuse poor management, but it should be considered when identifying an observation or situation as a challenge. Another consideration when weighing the severity of a challenge is the determination of whether the situation is a result of an acute event or a chronic occurrence. An example of a challenge that is less severe because it may be due to an acute event is a single fetus floating in the containment for a sow farm. The single fetus does indicate that some additional attention should be devoted to handling mortalities or that cleaning procedures need to be reviewed. If this observation had been coupled with the observation of the dead fetus and bones littering the inside slope of the containment, indicating a chronic situation, the challenges would be more severe, possibly falling into the high-risk category.

High-risk areas are those that present imminent and substantial threats to human health and the environment. High-risk situations should not be confused with high-priority situations. High-priority situations are those a service provider feels need attention soon; however, failure to address the situation most likely will not cause serious impact to human health or the environment. High-risk situations must be brought to the attention of the producer during the exit interview, and they must be emphasized in the final assessment report. These observations will require rapid follow-up evaluations and they are marked in bold type on the EA data collection form.

To ensure thoroughness, service providers must follow and address every question on the appropriate CLEANmp data collection forms. CLEANmp EA and NMP projects are restricted to the components and questions presented on their associated data collection forms.

Observations and records or plan review will comprise the foundation of all data collection and can be both qualitative and quantitative in nature. Any conclusions made must be based on observations or other information, that if another service provider saw them they would reach a similar conclusion.

If any question on the EA data collection form is answered “no,” the service provider must provide a detailed and objective description of what caused the “no” answer to be given. This description must be provided in the comment field opposite the applicable question.

If a service provider is unsure about a data collection question or its interpretation, he or she should record relevant observations in great detail and contact SES for guidance. SES has developed an interpretive guide that can help answer questions regarding the EA data collection questions. If a service provider cannot resolve one of these issues during the on-site portion of the project, the service provider should simply mention, during the exit briefing, that the particular data collection point has not been resolved and that he or she will consult with the program administrator for guidance. This should be an extremely rare to non-existent event.

Service providers must not overlook any environmental or nutrient management challenge that they observe, even if they believe the facility “made a honest mistake, or “intends to fix it right away.” Failure to record program pertinent data or ignoring relevant data is a breach of the CLEANmp Auditor Policy, CLEANmp Code-of-Conduct, and generally unethical. All data and other information relevant to a CLEANmp project must be recorded as observed.

A CLEANmp project will always consist of three key means of collecting data: 1) a physical evaluation (farm tour) of the operation (observations), 2) records review and 3) interviews. These are the principal methods of gathering relevant data. The physical evaluation provides data on an operation’s condition at the time of the project. The service provider also should try to gather information about how the facility operates during unusual situations, including power failures and critical employee absence. The records and training reviews determine if there is a reliable system in place to maintain observed actions or conditions. Interviews are used to gather data supporting information obtained from the records and training review, or to allow evaluation of conditions or actions not observed during the physical evaluation.

The order in which these three data collection methods take place is not important. A service provider can complete these tasks in any order and will probably need to vary the order as the situation dictates. These tasks are not independent activities. A service provider may not necessarily complete one of the tasks, observation (physical evaluation) for example, and then move on to records review or interviews. In fact, they will most likely be conducted concurrently and they will almost always complement each other.

Interviews are essentially all of the dialogue that occurs between the service provider and facility representative. The interview will include both active questioning and general conversation that takes place during the project. The service provider should interview both management and employees. The interviews will be conducted throughout the farm visit, including the physical evaluation and records review. A service provider must ask questions to confirm observations and clarify inconsistencies.

Interviews and questions also can lead to further review of records or additional physical evaluation in order to fully understand an observation. For example, a management representative tells an auditor that, “employee X always conducts containment inspections.” The

service provider would ask, “What happens when employee X is absent?” Depending on the response provided by the manager, the auditor will need to interview employee X and review documentation for containment inspections records when the employee was away on vacation.

A service provider should not be hesitant to ask the same question to multiple facility personnel. This may seem awkward and potentially rude; however, it should not be done to catch someone in a lie; instead, it should be used to determine if management policy is being implemented consistently by facility personnel. CLEANmp service providers may find that some facilities have well-planned and documented policies relative environmental practices and nutrient management, but that they are not implemented or are not effective; this would be a key finding, probably useful to the facility. If the policy and training is evident, the relevant audit question can be marked “yes;” however, if it is not deemed effective through interviews or observations, the question should be answered “no.”

There are three relatively passive or non-directive ways a service provider can interact with an interviewee during a CLEANmp project to facilitate open and free flowing information transfer. The first involves silence. Silence is also referred to as “passive listening.” Passive listening will encourage those being interviewed to continue to talk, but it will not provide any two-way communication or interaction. This method is effective because it allows the interviewee a chance to think and it infers that the service provider wants elaboration. While passive listening does not interrupt an interviewee, it does not give them a clear indication that the service provider is paying attention or understands the response.

A slightly more active strategy is to respond to an answer with a gesture or by providing a brief verbal acknowledgement. Visual or verbal acknowledgment of an interviewee’s response is better than silence in demonstrating that the service provider either understands the interviewee or is at least attentive. These types of response may invoke some encouragement for interviewees to continue to expound on their point or finish answering a question. These types of responses show that the service provider is interested and listening; however, they do not provide any direction to the interviewee (i.e., probing or directive questioning). Non-verbal examples may include shrugs, nods, smiles, hand gestures, etc. Verbal examples can include the following: Tracking (restating important points from a rambling answer to get the interviewee back on track), Reflecting Answers (repeating or paraphrasing a response to be sure it was understood), and Summarizing (the auditor summarizes a response and adds a natural extension that shifts the focus of the discussion). An example of summarizing is “Your training program involves both classroom and on-the-job training on an annual basis. How do you address the issue of non-English speaking employees?”

The third passive approach to questioning involves the use of door openers. Door openers show that the service provider is listening, and that he or she is willing to interact with the interviewee to explore their response. In addition, these questions or comments are very specific in nature and can be used as an opening for a new line of data collection inquiry or to help a stuck (mentally) interviewee. These types of interactions help build a non-confrontational atmosphere and shows that the service provider is interested and willing to listen. Door openers should be used cautiously and they must be worded in such a manner that the interviewee has a chance to

answer in their own words. Questions that can influence an answer must be avoided. If overused, door openers can appear repetitive and artificial. In many cases, door openers will take the form of an open-ended question.

Active questioning, either open-ended or leading, is a non-passive technique that is a natural extension of door openers. Active questioning allows a service provider to use questioning to probe a response for greater detail, clarification or confirmation. Active questioning fosters interactions between a service provider and producers or other interviewees. For example, if a producer indicates that the production buildings use mechanical ventilation, a service provider might ask how the mechanical ventilation is maintained in working order. This type of interaction allows for an interviewee to provide a detailed answer in their own words or for a service provider to probe into a response for more detail or a clearer explanation. With active questioning, service providers can help the interviewees who are having trouble understanding or answering a question. Having interviewees provide detailed answers in their own words is critical to the accuracy and representativeness of a CLEANmp project. This type of interaction can make interviewees more open to discussing data collection points with a service provider. If overused or applied in a mechanical fashion, this type of interaction can sound manipulative and artificial.

Open-ended questions allow a service provider to gather more information and obtain a more objective understanding of facility operations than asking directed questions. Answers to directed questions may not tell the whole story and may not yield information related to exceptional circumstances.

Generally, leading questions should be avoided. Leading questions may result in incomplete, non-objective or even false information. Occasionally, a service provider may need to ask a leading question to get a response from a facility representative only after an open-ended or direct question gets no response.

3.4. Exit Interview

After completing the on-farm portion of the project, a service provider must review his or her data collection findings, in private, identifying any data gaps and preparing a summary of findings. If any data gaps require direct observation, the service provider must go out on the farm to make the appropriate observation. If this data can be accurately obtained without direct observation, a service provider can fill data gaps during the exit interview.

During this private data review, the service provider will compile his or her notes regarding the EA or NMP. The EA data collection tool has a section that is designed to assist a service provider in recording strengths and challenges observed during the assessment. The exit results for an EA must be recorded on this section of the data collection tool.

The service provider will present his or her findings to the producer. The presentation should start with a brief summary of the service provider's general impressions of the operation,

addressing both strengths and challenges. If there were any high-risk areas observed, these also will be reviewed. Any high-risk areas should have been discussed with the producer at the time they were discovered. Once this summary discussion is completed, the service provider will present a complete list of strengths and challenges for the operation. Where appropriate, the service provider should provide the producer with recommendations for addressing the challenges. Service providers need to be thorough in their exit interview. Every effort should be made not to include new challenges in the report unless the producer has been consulted in advance. Odor and environmental aspects should be clearly separated in this discussion. Odor is generally a social concern, while the other environmental impacts of livestock and poultry production tend to be either potential regulatory or liability issues. The exit interview for a NMP project will be shorter and less detailed than an exit interview for an EA project.

As challenges are discussed the service provider should explain why addressing the challenges will benefit a producer's operation. It is the service provider's job to educate the producer on the benefits of addressing challenges.

At the end of the summary, challenges should be ranked as to their priority. In ranking the priority of a challenge, the service provider must balance social concerns, technology, and economics. This prioritization should not be presented to the producer as an absolute evaluation; rather, it should be stressed that this prioritization is based solely on the opinion and experience of the service provider. To give validity to the prioritization, the service provider must provide the producer with the rationale used to make the relative ranking.

During the exit interview, the service provider should answer the producer's questions to the best of his or her ability or direct the producer to someone who can. In many cases, leaving the program administrator's (SES) toll-free phone number (800) 897-1163 with the producer will allow the producer to access different levels of technical assistance. Other sources of help include: other approved service providers, federal sources (e.g., NRCS), state and local resources (e.g., Extension), analytical laboratories, computer software, reference books, and the Internet.

Before concluding the exit interview, the service provider must verify that all CLEANmp data collection forms are complete. The service provider must discuss the schedule for delivering the final EA or NMP reports. An EA report must be completed 14 days after the on-farm portion of the project and a NMP must be completed 30 days after the on-farm portion of the project.

The service provider also should discuss potential follow-up evaluations by the program, and any additional sources of expertise that could help the producer. If the assessment identified a high-risk situation, the producer will be contacted approximately 90 days after the final report is mailed out, to see if the high-risk challenge has been addressed. SES will conduct project follow-ups.

Approximately 10 percent of all farms will be randomly selected for long-term follow-ups. The timing for these follow-ups has not been determined yet.

4. Reporting

The final EA report must be sent to SES no later than 14 days after the on-farm portion of the project and NMP reports must be submitted to SES no later than 30 days after the on-farm portion of the project. These reports will be reviewed and, if they are found to meet the program standards, they will be mailed to the producer within seven days. If a report does not meet program standards, the service provider will be asked to clarify or re-write portions of the report.