



Natural Resources Conservation Service
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February 23, 2012

KANSAS BULLETIN NO. KS340-12-4

SUBJECT: SPA–Oversight and Evaluation Corrective Action Plan

Action required by: March 16, 2012 (Field Offices [FOs])
June 15, 2012
September 14, 2012

Action required by: March 23, 2012 (Area Offices [AOs])
June 22, 2012
September 21, 2012

Purpose. Cancel Kansas Bulletin KS340-12-1 and reissue the Kansas Corrective Action Plan (CAP) with updated clarification on how Kansas will correct errors and omissions identified in the recent oversight and evaluation review

Expiration Date. September 30, 2013

The National Oversight and Evaluation (O&E) Team’s July review of Kansas’ program delivery determined that the manner in which some financial assistance programs function are being conducted is not in compliance with policies, procedures, and regulations. In order to prevent reoccurrence of the identified deficiencies, Kansas has agreed to implement a CAP (see attachment).

A quarterly report of our efforts to comply with the CAP will be submitted to national headquarters. FOs will forward reports to the AO contact and the AOs will compile those reports and forward them to Joní Y. Franklin, Resource Conservationist, at the state office by the end of each quarter (see action dates above).

Personally Identifiable Information (PII)

Finding number 9 cited Kansas as having “improper maintenance of personally identifiable information.” In order to ensure PII is protected from potential misuse, it is the policy of the Natural Resources Conservation Service (NRCS) to permanently remove from or make unreadable documentation containing PII (e.g., social security numbers, bank account numbers, and bank routing numbers).

(more)

DIST: A, F, S, P. Clark, Eaves, Franklin, C. Nelson, Ramsey, Thurlow

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The following forms are to be permanently removed from the customer folder and kept in a secure location (under lock and key):

- Form NRCS-CPA-1199, Direct Deposit
- Form CCC-36 or Form NRCS-CPA-1236, Assignment of Payment

Copies of driver's license, or other forms of identification, and checks or copies of cancelled checks maintained in the customer file are to be removed and **shredded immediately**. If a voided check was attached to Form SF-1199A, it is to be **shredded immediately** and the participant(s) is to complete a new Form SF-1199A with all the required information completely entered.

If PII is on Form CCC-901, Member's Information, or Form CCC-902E, Farm Operating Plan for an Entity, then the forms should be made PII unreadable or removed and filed in a separate secure location.

Environmental Evaluation Worksheet

Finding number 7 identified inaccurate or lack of Environmental Evaluation Worksheet documentation in both Easements and Environmental Improvements and that "impacts are not adequately documented nor are in compliance with the National Environmental Protection Act (NEPA)." FOs will ensure Form NRCS-CPA-52, Environmental Evaluation Worksheet, is on file and completed in its entirety and that all proper signatures are present. The annual contract review will include an assessment of Form NRCS-CPA-52 to verify concurrence with policy.

NRCS Approving Official Electronic Signature Requirement

The O&E Team also identified "missing, incomplete, or incorrectly signed contract documents during their review in July." FOs will ensure that the following documents have a copy of the NRCS approving official's electronic signature page printed from Program Contracts System (ProTracts) and filed in the customer folder for the record:

- Form NRCS-CPA-1202, Conservation Program Contract
- Form NRCS-CPA-1155, Conservation Plan or Schedule of Operations
- Form NRCS-CPA-1156, Revision of Plan/Schedule of Operations or Modification of a Contract (if applicable)
- Form NRCS-CPA-152, Conservation Program Contract Transfer Agreement (if applicable)
- Form NRCS-CPA-1245, Practice Approval and Payment Application

These documents should be reviewed and corrected, if necessary, when payments are being processed or contract reviews are being completed.

Contact: Forward questions through established channels to Joni' Y. Franklin, Resource Conservationist, at joni.franklin@ks.usda.gov or call (785) 823-4556.

(Signed)

ERIC B. BANKS
State Conservationist

Attachment