



Natural Resources Conservation Service
P.O. Box 2890
Washington, D.C. 20013

May 3, 2010

CONSERVATION PROGRAMS MANUAL (CPM)
440-CPM
Circular No. 19, Part 512

Subject: CPM – Financial Assistance Program Contacts and Guidance for Addressing Eligibility Concerns

Purpose. To provide State Conservationists with procedures for diagnosis, review, and resolution of eligibility issues for financial assistance Conservation Program Contracts (CPC) and applications managed through ProTracts.

Effective Date. This circular is effective upon receipt.

Background. Comprehensive eligibility training was delivered in a net conference on March 8, 2010. A recording of the training and the accompanying materials are available through the ProTracts home page. The training provided the sequential process for addressing eligibility issues, and the required forms and checklists. This circular provides further clarification for handling issues related to contract and applicant eligibility. Policy guidance related to business tools support protocol can be found in the Conservation Programs Manual (440-CPM), Title 440, Part 512, Subpart A, General Information, Section 512.3(E).

Explanation. Eligibility issues related to CPC applicants and contract holders can be complex. The attached checklists (Attachment A) and forms (Attachment B) are intended to both serve as a systematic guide in diagnosing eligibility issues and provide a tool for communication between NRCS service centers, area and State offices, National Headquarters (NHQ), and with the Farm Service Agency. Eligibility issues may arise at different stages of application and contract management. These include but are not limited to approval of applications, contract obligation, modification, successors in interest modifications, and processing payments. Highest priority for resolving eligibility issues will be given to those that involve processing contract payments.

These protocols will be followed when ProTracts and Fund Manager erroneously show the participant is ineligible for an obligation, payment, or modification based on the eligibility criteria in 440-CPM, Part 512, Subpart J, Exhibits, Section 512.91. Issues related to software, and not directly related to ineligible participants (for example, a message “insufficient payment limitation balance” that seems to be in error) should continue to be sent to the Fund Manager/ProTracts support desk following established protocols.



Actions Required for Processing Eligibility Issues:

1. **Monitor Fund Manager Reports**—States must regularly monitor Fund Manager Reports, specifically: “Applications and Contracts with Eligibility Issues,” and “Applications and Contracts with AGI Member Eligibility Issues.”

2. **Diagnose Issue and Complete Checklist**—The “Checklist for NRCS Customer Eligibility” must be completed if an eligibility issue is escalated to NHQ. It should be used both as a guide and for documentation for all eligibility issues. Steps and procedures for diagnosing eligibility issues are detailed in the training and summarized by the checklist.

3. **Escalate to NHQ**—If all appropriate investigative measures have been taken at the State level and the issue remains unresolved, it is eligible for escalation to NHQ. An e-mail address has been established for all eligibility issues; it is NRCS-FAPD@wdc.usda.gov.

- a. The State point of contact (POC) will e-mail the following documents to NHQ:
 - i. FAPD eligibility log.
 - ii. Checklist for NRCS Customer Eligibility.
 - iii. MABDIG from the current fiscal year and the correct recording county.
 - iv. FSA Subsidiary Report showing all pertinent years (at a minimum, this will be the year of obligation and the current fiscal year) SCIMS screen print.
 - v. Screen print of Fund Manager eligibility screen.
 - vi. Encrypted password (sent in a separate e-mail).
- b. Personally identifiable information (PII) sent through email must adhere to the current standard operating procedures (SOP). This includes utilizing an encrypted attachment, with the password sent in a separate e-mail. An attachment to this circular provides guidance (Attachment C) for this process.

4. **NHQ Investigation**—NHQ will assign a log number and notify the State point of contact. The NHQ program specialist will investigate and provide assistance in resolving the issue, as well as communicate with FSA NHQ (if necessary) and respond to the State regarding status and resolution of the issue.

5. **Eligibility Override**—If the issue cannot be resolved, it will be considered for an eligibility override. The FAPD director will approve or disapprove each request for an override based upon individual circumstance and considerations. Considerations that must be addressed for eligibility override include—

- a. Has due diligence been exercised to assure that the payment or obligation is proper?
- b. Are there risks to the agency involving potential improper payments? Are these considerations documented through use of the checklist?
- c. Are ProTracts funds available?
- d. Will payment limitations be exceeded?

6. Notification to State POC—After review, national program manager will notify the State regarding determination and resolution of the override. If approved by the FAPD director, the program manager will approve an override of ProTracts/Fund Manager for a 30-day period.

Contact. Questions regarding the processes described in this circular should be directed to the appropriate program manager.

/s/

CRAIG R. DERICKSON
Deputy Chief for Financial Assistance
and Community Development

Attachment A – Checklist for NRCS Customer Eligibility

Attachment B – FAPD Eligibility Log

Attachment C – Instructions for Using WinZip to Encrypt Sensitive Data Tips and Tricks

Checklist for NRCS Customer Eligibility

Program select program

ProTracts Contract Number

Participant Name:

Checklist Completed by on Date

NRCS Steps:

1. NRCS defines what action the eligibility issue is impacting:

- A. Current year obligation
- B. Contract payment or Contract Modification for Contract Year select year
- C. Contract successor-in-interest.

Successors on contract prior to 2009 must complete CCC-526C per FSA Notice PL-187 to certify AGI status for AGI-2002 Farm Bill. Participant must enter year in which they are succeeding on the conservation contract in item number four per guidance in CPM 440 Part 512.54.

2. NRCS uses Update Eligibility in NRCS software to review the current participant eligibility status. This step should be repeated on a periodic basis until the issue is resolved.

3. NRCS staff reviews the Program Eligibility Matrices in CPM 440 Part 512.98 for the applicable program and the participant business type.

A. If the business type is not eligible for conservation program payments NRCS software will display the following eligibility error message: *"Business type is not permitted for this program."*

B. If the business type is not valid for the program the following eligibility error message will display *"Subsidiary records indicate an ineligible participant"*

4. NRCS defines the specific eligibility issue as one or more of the following after reviewing the application or contract eligibility error messages in NRCS software: *"Subsidiary records indicate an ineligible participant"*:

Eligibility for current fiscal year application

- A. AD-1026
- B. Farm Tract Eligibility (FTE)
 - i. Highly Erodible Land Conservation
 - ii. Planted Converted Wetland
 - iii. Converted Wetland
- C. AGI- Conservation Program

Eligibility for modification or payment on prior year contracts

- D. AD-1026
- E. Farm Tract Eligibility (FTE)
- i. Highly Erodible Land Conservation
- ii. Planted Converted Wetland
- iii. Converted Wetland
- F. AGI - 2002 Farm Bill for contract years 2002-2008
- OR
- G. AGI - Conservation Program for contract years 2009-2014

Program Payment Limitations

- H. No direct diagnostic assistance should be requested from FSA other than a MABDIG to resolve any member issues.
5. NRCS checks FSA Subsidiary Print through the FSA Subsidiary Application web site to confirm AD-1026 and Conservation Compliance status for the participant in current year and the applicable AGI for year of obligation. See 3-PL (rev 1) paragraph 303 for additional instructions on the subsidiary print.
6. NRCS verifies with participant that certification is filed with FSA if subsidiary indicates value "Not Filed". See letter in CPM 440 part 512.91A.
7. NRCS defines the specific eligibility issue as one or more of the following after reviewing the contract eligibility error messages in NRCS software: "*Subsidiary records indicate an ineligible participant*":

Entity Issues:

- A. Entity is missing members
- B. Entity ownership share is not equal to 100%
- i. Provide FSA non PII print of shares from NRCS software
- C. One or more members do not have a tax id or the tax id is ineligible.
- D. The entity type on the MABDIG does not match the business type in SCIMS.
- E. Member AGI - 2002 Farm Bill Certification for 2002-2008 contracts
- F. Member AGI- Conservation Program Certification for 2009-2014 applications or contracts.

Joint Operations Issues:

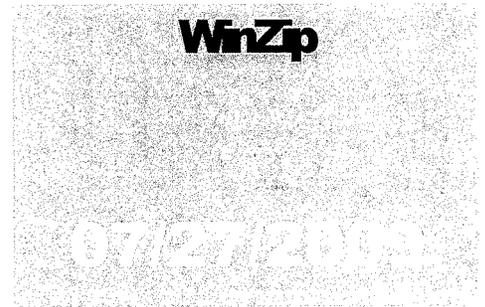
- G. Joint Operations Member Missing
- H. Joint Operations Member Missing AD-1026, HEL/WC Certification
- I. One or more members do not have a tax id or the tax id is ineligible.
- J. The entity type on the MABDIG does not match the business type in SCIMS.
- K. Member AGI - 2002 Farm Bill Certification for 2002-2008 contracts.
- L. Member AGI- Conservation Program Certification for 2009-2014 applications or contracts.
8. NRCS requests the MABDIG report for the current fiscal year from local office for the participant recording county.

9. Review the MABDIG and SCIMS data for these common problems:
- A. Compare Participant Entity Type on MABDIG to SCIMS business type
 - B. Compare tax id number and type between MABDIG and SCIMS.
 - C. Compare Member Type on MABDIG to SCIMS business type for Entity Members or Joint Operations. FSA will utilize reports in Common Provisions web site per PL-191.
10. NRCS reviews any remaining discrepancies with participant.
11. NRCS updates participant eligibility after any FSA corrective actions have been taken
12. NRCS escalates any remaining issue with this checklist and additional descriptive information to appropriate State contact if the issues are not resolved in a timely manner to process a payment or to meet obligation deadlines.

Comments

13. NRCS State contact escalates any unresolved issues to NHQ contact with this completed checklist, eligibility tracking spreadsheet, and additional documentation as applicable.

Comments



FARM SERVICE AGENCY

GIS Training Material—Tips and Tricks Series

Instructions for Using WinZip to Encrypt Sensitive Data Tips and Tricks

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GIS TRAINING MATERIAL—TIPS AND TRICKS SERIES

Instructions for Using WinZip to Encrypt Sensitive Data Tips and Tricks

Farm Service Agency, USDA

Please forward comments and suggestions about this document to:
David Taylor, FSA HQ, Washington DC, david.taylor@wdc.usda.gov
Phone (202) 720-6255

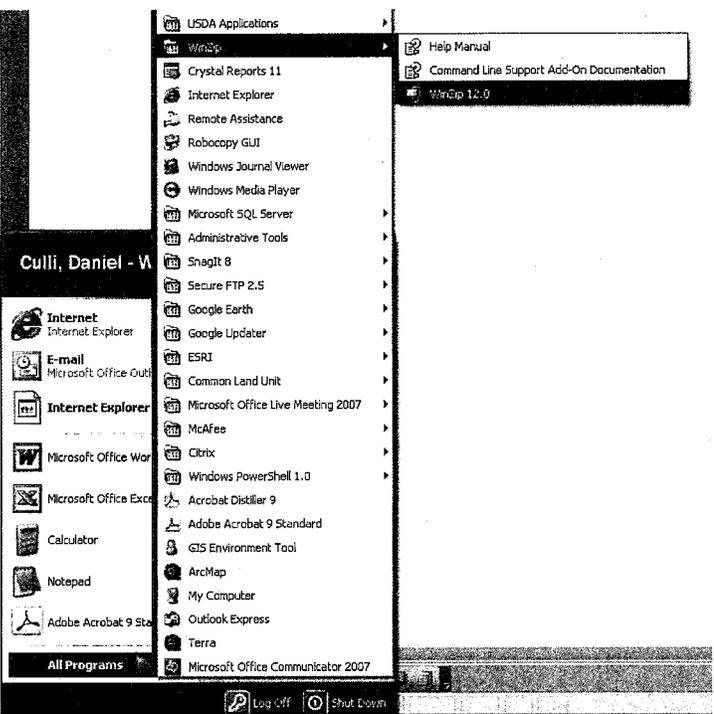
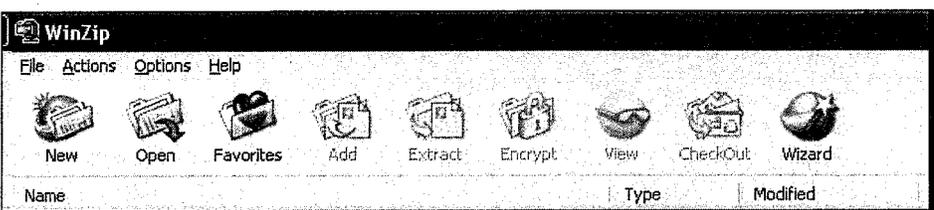
INSTRUCTIONS FOR USING WINZIP TO ENCRYPT SENSITIVE DATA
TIPS AND TRICKS

1 Purpose of the Document

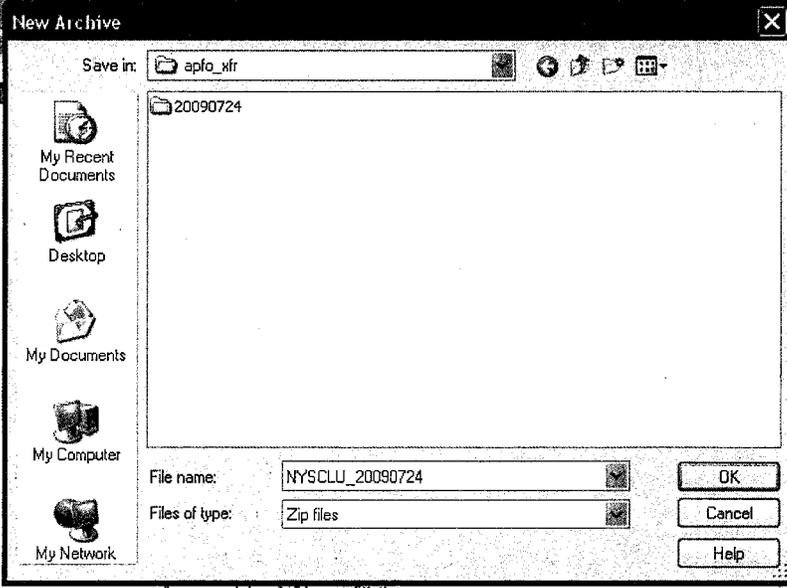
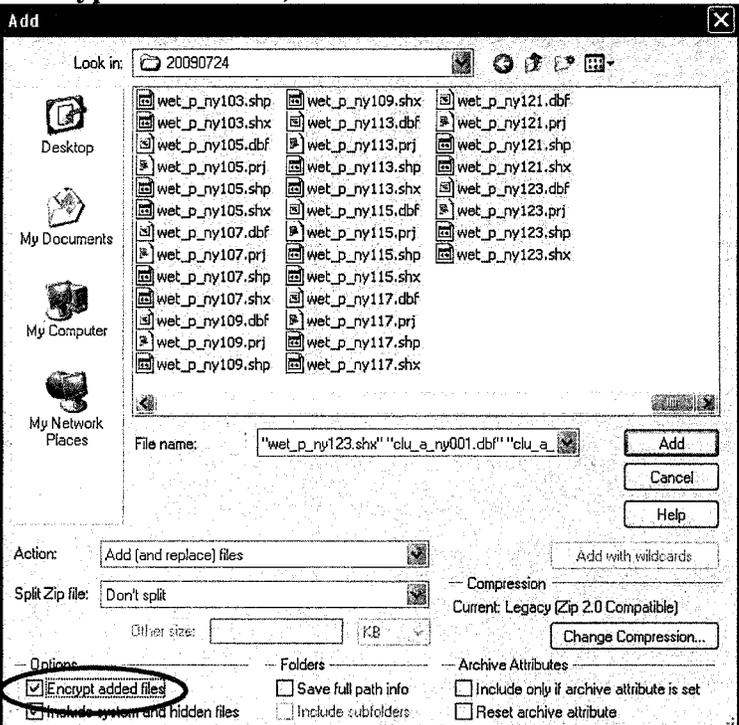
The documents in the Tips and Tricks Series assist State and County Offices with GIS applications and related activities. The documents do not address program procedure issues.

This document provides instructions for using WinZip to encrypt sensitive data. IRM-372, Exhibit 2 was referenced.

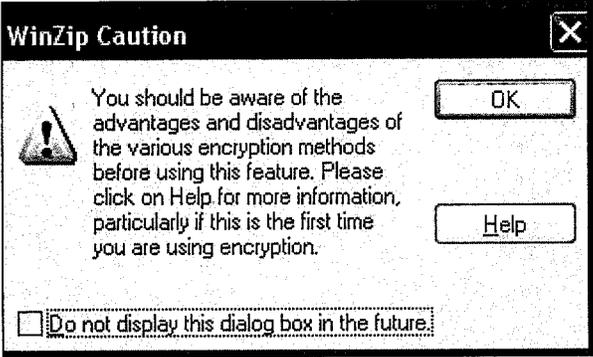
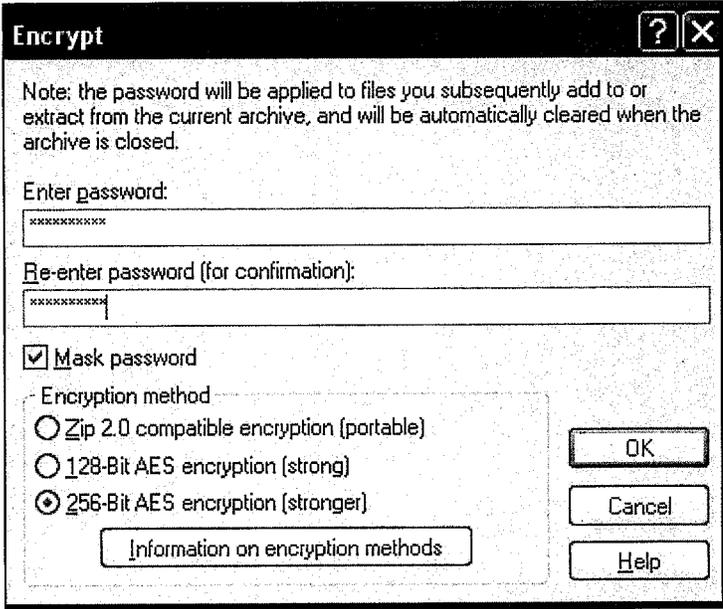
2 Recommendations for Processing

Step	Action
1	<p>From the Start Menu on user's computer, select "WinZip 12.0".</p>  <p>The screenshot shows a Windows Start menu for user 'Culli, Daniel - W'. The 'WinZip' folder is expanded, and 'WinZip 12.0' is highlighted. Other visible items include 'USDA Applications', 'Crystal Reports 11', 'Internet Explorer', 'Remote Assistance', 'Robocopy GUI', 'Windows Journal Viewer', 'Windows Media Player', 'Microsoft SQL Server', 'Administrative Tools', 'Snagit 8', 'Secure FTP 2.5', 'Google Earth', 'Google Updater', 'ESRI', 'Common Land Unit', 'Microsoft Office Live Meeting 2007', 'McAfee', 'Citrix', 'Windows PowerShell 1.0', 'Acrobat Distiller 9', 'Adobe Acrobat 9 Standard', 'GIS Environment Tool', 'ArcMap', 'My Computer', 'Outlook Express', 'Terra', and 'Microsoft Office Communicator 2007'. The taskbar at the bottom shows 'Log Off' and 'Shut Down' buttons.</p>
2	<p>CLICK "New" icon to create a new WinZip archive.</p>  <p>The screenshot shows the WinZip application window. The menu bar includes 'File', 'Actions', 'Options', and 'Help'. The 'Actions' menu is open, displaying icons for 'New', 'Open', 'Favorites', 'Add', 'Extract', 'Encrypt', 'View', 'CheckOut', and 'Wizard'. Below the icons is a table header with columns for 'Name', 'Type', and 'Modified'.</p>

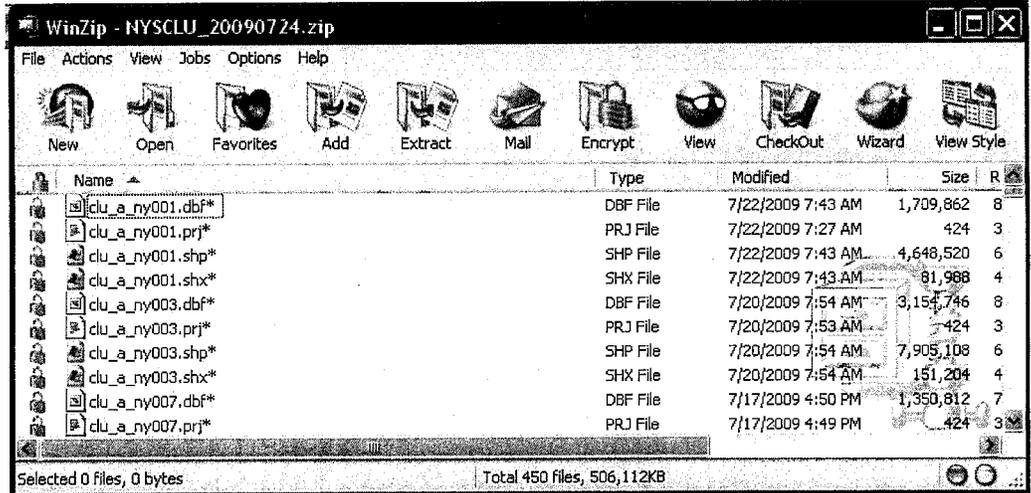
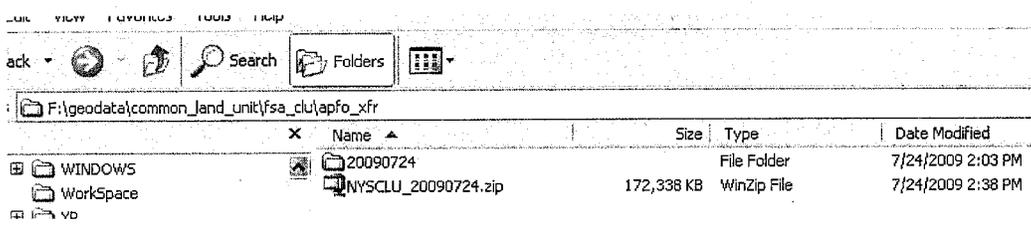
INSTRUCTIONS FOR USING WINZIP TO ENCRYPT SENSITIVE DATA
TIPS AND TRICKS

Step	Action
3	<p>In the "File name:" box, enter a filename for user's encrypted file such as, "NYSCLU 20090724", and CLICK "OK".</p> 
4	<p>Select the files user wants encrypted, such as your CLU's that will be included in this zip file for APFO. To select more than one file hold your shift key on the first and last file and everything in between will be selected. Be sure to CHECK (✓) "Encrypt added files", and CLICK "Add".</p> 

INSTRUCTIONS FOR USING WINZIP TO ENCRYPT SENSITIVE DATA
TIPS AND TRICKS

Step	Action
4 Cont	<p>A dialog box will display to suggest that the user read the WinZip Encryption Help File. This is highly recommended unless user is an experienced user. CLICK “Help” or “OK”, as appropriate.</p> 
5	<p>CLICK radio button for “256-Bit AES encryption (stronger)”, enter a password, enter a password again, and CLICK “OK”.</p>  <p>Note: The password used should be at least 8 characters long, have both capital and lower case letters, and should have at least 1 number or special character in the middle of the password. For additional details on choosing passwords, contact user’s local help desk.</p>

INSTRUCTIONS FOR USING WINZIP TO ENCRYPT SENSITIVE DATA
TIPS AND TRICKS

Step	Action
6	<p>WinZip will display the contents of the encrypted file user created in steps 4 and 5.</p> <p>Example: The file name in this screen print is, "NYSCLU_20090724".</p> <p>WinZip can be closed; CLICK "X" in the upper, right-hand corner.</p> 
7	<p>The encrypted file (displayed on this screen print as, "NYSCLU_20090724.zip") is now properly protected and may be transported by e-mail, CD Rom, floppy disk, or other unsecure media/means, as appropriate.</p>  <p>Notes: Passwords should never be written down, e-mailed, or shared with unknown individuals.</p> <p>Because of recent emergence of some viruses and worms that use the WinZip (.zip) file extension, some USDA and other e-mail systems may filter out WinZip (.zip) file attachments, preventing them from being forwarded as e-mail attachments.</p>