

For: State and County Offices

Physical Location of EQIP Files

Approved by: Deputy Administrator, Farm Programs



1 Overview

A Background

In FY 2002, FSA and NRCS entered into a Reimbursable Agreement reflecting agreement to reimburse for services provided during FY 2002. A similar Reimbursable Agreement is being negotiated for FY 2003.

State and County FSA Offices were notified by joint FSA-NRCS memorandum dated August 28, 2002, that the Reimbursable Agreement provided that FSA would transfer official files for all EQIP contracts to NRCS no later than December 31, 2002. An e-mail message sent December 13, 2002, by CEPD to all State Offices, advised that the deadline for transfer was temporarily postponed because it was determined FSA must retain some official files and clarification was needed about proper handling of other EQIP source documents.

It has been determined that FSA must have access at any time to the following EQIP files:

- reports and correspondence related to EQIP ledgers and allocations, because FSA continues to maintain ledgers and allocations
- EQIP appeals, because by statute COC's continue to have initial jurisdiction
- CCC-1245's authorizing disbursement of payment and original Producer Disbursement Transaction Statements, because FSA issues payments for EQIP.

Because both FSA and NRCS administer CCC programs and EQIP is a CCC program, official EQIP files may be physically maintained by either agency.

Disposal Date	Distribution
October 1, 2003	State Offices; State Offices relay to County Offices and NRCS State Offices

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1 Overview (Continued)

A Background (Continued)

Operations Review and Analysis Staff advised that FSA should have access to official files used as a source for data load into automated system in case of a review, audit, or investigation.

SED and State Conservationist must negotiate the physical location of files, either with FSA or NRCS. In either case, FSA or NRCS must have guaranteed access to the files.

B Purpose

This notice informs State and County Offices of the following:

- FSA or NRCS, as appropriate, may maintain official EQIP files and must ensure guaranteed access by the other agency
- revised deadline for actions required by this notice.

C Related Directives

25-AS will be amended to reflect FSA filing changes described in this notice.

D Contact

State Offices should direct questions to Cheryl Butler, CEPD at 202-720-6304. State NRCS Offices should contact Ed Brzostek at 202-720-1834.

E Agreement

NRCS National Office has reviewed and is in agreement with this notice.

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2 Official Files to Which FSA Must Have Access

FSA must be guaranteed access at any time to the following documents according to the retention requirements in 25-AS and the agreement in subparagraph 4 A. If access cannot be guaranteed, FSA must retain the official files containing items below and must provide access to NRCS.

A Reports and Statistical Summaries

Reports and statistical summaries to be retained, if file access is not guaranteed are:

- copies of signed CCC-1200's Referred for Ranking Report (EEB 710-R001)
- copies of signed CCC-1200 Applications Received Report (EEB 710-R001)
- CCC Allocation Reduction Report - Fiscal Year-end (EEB 460-R001)
- CCC Allocation Increases or Decreases Report (EEB 231-R001)
- the differences between Conservation 305 and State CCC Ledger Reports (EEB 235-R006)
- Program Summary Ledger Report (EEG 235-R002)
- COC minutes documenting decisions about EQIP contracts, as applicable.

B Allocation Control Ledgers, Reports, and Related Material

Allocation control ledgers, reports, and related material to be retained, if file access is not guaranteed are:

- correspondence about the control of program activities and funds
- sequential ledger entry report, detailed ledger used to control program funds, and related correspondence
- ledger reports.

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2 Official Files to Which FSA Must Have Access (Continued)

C CCC-1245's and Producer Disbursement Statements

CCC-1245's and producer disbursement statements to be retained, if file access is not guaranteed are:

- original or copy of CCC-1245's that resulted in payment being disbursed
- original Producer Disbursement Transaction Statement documenting direct deposit of payment.

D Appeals

FSA must maintain material related to EQIP appeals by individual producer, if file access is not guaranteed.

3 Official Files to Which FSA Should Have Access

A Source Documents

To document accuracy of data entered into automated system in case of a review, audit, or investigation, County Offices should have access when needed, and for the retention according to 25-AS, to the following official files used as source documents. If official files are transferred and access cannot be guaranteed, County Offices may maintain a copy of such documents as determined by SED and according to retention requirements in 25-AS. Documents include, but may not be limited to:

- CCC-1200 contract as approved
- CCC-1200 (Appendix) or CCC-1200 Appendix - EQIP
- contract support document for approved CCC-1200
- documentation of request(s) to modify CCC-1200
- CCC-1200 contract as modified
- non cost-share CCC-1245's certified for final performance
- documentation related to contract termination and request for refunds, if applicable
- documentation that serves as basis for entries made in CCC County Eligibility Table according to 2-CONSV, Part 2, including cost-share and incentive payment levels.

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4 Action

A State Office Action

SED and State Conservationist will:

- negotiate physical location of official files
- enter into an agreement regarding physical location of official files that must:
 - be in writing
 - be signed by both SED and State Conservationist
 - guarantee FSA and/or NRCS access at any time, and for the retention according to 25-AS, to official files described in paragraph 2
 - guarantee FSA and/or NRCS access when needed, and for the retention according to 25-AS, to all other official files.

State Offices shall:

- forward information in this notice to County Offices
- provide County Offices with a copy of SED and State Conservationist agreement about physical location of official files
- ensure transfer of official files, if applicable, is completed by July 31, 2003
- if any or all EQIP files were transferred before receipt of this notice, provide procedure to County Offices as necessary to ensure physical location and access to files reflect the requirements of this notice.

B County Office Action

County Offices shall follow provisions of this notice to ensure that EQIP files are transferred or maintained as agreed by SED and State Conservationist, by the deadline in subparagraph A.