

2024 NASCOE Negotiation Items

Item 1

Issue:

The National Office has encouraged the use of an SQA to hire a superior candidate above the minimum pay rate (27-PM, Par. 701). Supervisors in the field continue to have SQA requests denied by DAFO for reasons not specifically stated in 27-PM. A CED had the following experience when attempting to hire a superior qualified candidate (identifying information has been removed):

I interviewed 4 applicants for a PT position. Applicant A scored an average of 37 points higher on a scale of 0-280 among 3 interviewers. They hold both an associate degree and a bachelor's degree in business administration and have 12 years of experience directly related to the position (customer service, deeds, legal surveys, trusts, estates, and administration) with the last 10 years being at the local County Clerk's Office. The offer was declined due to salary, and I submitted an SQA for them to be hired at a CO 5-8 which would equal their hourly salary at the courthouse plus pay the insurance premium as the county pays 100%. Applicant B, the first alternate has no college degree and a more limited work history that is not directly related to the position being filled. Applicant C, the second alternate is an internal candidate who has been a PT in a different in-State FSA Office for approximately 2 years.

Thorough documentation was submitted to DAFO and included the selectee's entire application packet, paystub, the interview score sheets, and a detailed justification. The SQA was denied. The State AO requested that it be reconsidered, and it was denied a second time. The response from DAFO read as follows:

"This request was further reviewed in DAFO, and we have determined that this request for a SQA for (the applicant) should not be approved, consistent with how we have handled other such cases where a current PT is on the certificate and the following criteria from Handbook 27-PM:

Superior qualifications determination must be based either on the relevance of the candidate's experience and education to the particular work he or she will do, or on the quality of the candidate's accomplishments compared to others in their field. These qualities must be significantly higher than that needed to be minimally qualified for the position and be of a more specialized quality compared to other candidates."

It was further noted that alternate selections were noted on the certificates, including the current PT.

Due to these reasons, the best qualified applicant denied the offer. The internal applicant

who was less qualified ultimately accepted the position. Paragraph 701 of handbook 27-PM does not currently state that an SQA should be disapproved when a current PT is on the certificate. The response from DAFO claimed that their decision was based on how similar cases have been handled, but this process does not come directly from handbook policy. If similar cases are being handled with the same conclusion, then the policy must be in place for this decision. Current handbook policy in 27-PM Par. 701 A states:

“This authority is to be used to make competitive offers to high-quality candidates entering the County service for the first time or returning to County employment after a break in service of 90 calendar days or more.

In using this authority, managers and supervisors should consider the following:

- whether the use of the authority is necessary to entice the candidate to accept the position (the candidate would otherwise decline the position)”

NASCOE Recommendation:

All SQA requests should be considered individually, based on their own merit. An application from an internal applicant or an applicant on a higher rated certificate should not be considered as a basis for an SQA denial on its own.

Further, DAFO should not deny requests when there is a lack of handbook guidance to substantiate the denial. Until these requests are given serious consideration, FSA will continue to fail in attracting the best employees who represent the future of our agency.

FSA Response:

DAFO considers each SQA request individually based on their own merit and the Handbook 27-PM policy. Evaluations of requests for SQA are based upon written documentation of an individual’s qualifications as compared to other candidates. Handbook 27-PM states:

Superior qualifications determination must be based either on the relevance of the candidate’s experience and education to the particular work he or she will do, or on the quality of the candidate’s accomplishments compared to others in their field. **These qualities must be significantly higher than that needed to be minimally qualified for the position *and be of a more specialized quality compared to other candidates.***

This criteria is not met when an SQA for an external candidate is submitted and there is also an eligible applicant with FSA experience.

With a recent OPM regulatory change prohibiting the consideration of an individual’s private sector salary, changes will be forthcoming in the Departmental Regulation on SQA and Handbook 27-PM policy.

Resolution:

NASCOE accepts this response but would request a notice be issued until the 27-PM amendment can be issued.

Item 2:**Issue:**

Conflicting forms and policies are confusing for employees especially when policies are located in various locations. A couple examples would be the differences between work schedule policy in FPAC Policy - FPAC-P-4000-001 and 17-PM (Rev. 2), which was last amended on 2/2/2011. Another example would be 5-PM (Rev. 12), which still references a 5-tier performance system and currently, we are using the pass/fail performance rating system. It can become difficult for new employees and managers to know which materials they should be referencing when FPAC and FSA have contradicting policy in multiple locations.

NASCOE Recommendation:

FSA would empower employees by having one place to find relevant information about their job so that they can make informed decisions. FPAC Policy should be reissued as FSA Notices and listed on the FSA notice application page. This is already done with some FPAC Policies such as FPAC-N FMD-055. Handbook 17-PM (Rev. 2) and 5-PM (Rev. 12) need to be amended to reflect current policy. Procedure should be regularly updated to match information in FPAC Policies or to remove information covered in FPAC Policies.

FSA Response:

DAFO continues to discuss the need for policy coordination with BC-HRD. Handbooks 17-PM and 5-PM have both been noted as priority handbooks in need of updating.

Resolution:

DAFO will discuss with FPAC on the location of the directives to make them more accessible on the OneUSDA page and with the updating of 5-PM and 17-PM this should clarify some of the confusion on which policy to follow. DAFO will ask FPAC for a subscription link to share with FSA employees so that when a new directive is posted it will be emailed just as FSA notices are currently.

Item 3:**Issue:**

Effective December 27, 2021, the National Defense Authorization Act provided parental bereavement leave to eligible employees for two work weeks (up to 80 hours) of paid leave in connection with the death of a qualifying child. The death of an employee's qualifying child triggers the law's one-time entitlement to 2 workweeks of parental bereavement leave, which must be used within 12 months of the child's death. To be eligible, the child must be under

the age of 18, or 18 years and older and incapable of self-care because of a mental or physical ability. In addition, the employee must have completed 12 months of service as an employee.

In a fact sheet from USDA Office of Human Resource Management titled “Frequently Asked Questions – Parental Bereavement Leave”, under Eligibility, it states the employee must be covered under the title 5 annual and sick leave program. Since the enactment of Parental Bereavement Act, there has been email correspondence issued as it related to Parental Bereavement Leave specifically on the definition of a qualified child.

NASCOE Recommendation:

Since the enactment of Parental Bereavement, the authorization has been issued via emails. Currently, there has not been any guidance issued via PM notices or handbook 17-PM (Rev 2). In addition, the applicability of Parental Bereavement to CO (Title 7) Employees needs to be clearly defined.

NASCOE has received inquiries regarding the definition of qualifying child from miscarriages to adult military children. The law states it is only applicable in situations involving a child under 18 years of age or a child over 18 that needed dependent care due to a mental or physical disability. The lack of traditional procedure versus the guidance provided via emails has led to confusion regarding the applicability of the Parental Bereavement provisions. NASCOE recommends the issuance of procedure through a PM Notice and/or 17-PM (Rev.2) amendment to clarify the applicability of the Parental Bereavement Provisions to CO (Title 7) Employees and to clarify the definition of a qualifying child.

FSA Response:

HRD guidance noted that DAFO had extended this leave benefit to CO employees. DAFO will include this information in the Handbook 17-PM Amendment.

Resolution:

DAFO noted that there is a lack of guidance across FPAC for the bereavement leave and they are still asking for guidance and publication. In the interim, DAFO will get a refresher out to the state offices regarding Paid Parental Leave and Parental Bereavement Leave and the policy will be updated in the 17-PM amendment.

Item 4

Issue:

Newer handbooks do not utilize 1-AS standards according to par. 16 B. Specifically, all redelegation of authority within the handbook are not being summarized in Exhibit 1. The inconsistency makes it difficult to locate policy and to train new PTs and CEDTs. Handbook 1-AS, par. 15 A references the importance of standardization in a directives system.

NASCOE Recommendation:

Our national handbooks are used daily within the FSA Agency by veteran and new employees. New PTs and CEDTs are expected to learn the basic rules and regulations required by our agency in all the different programs we offer. Handbook 1-AS (Directive Management) was developed to provide standards for writing and locating information within all our national handbooks. Paragraph 16 in 1-AS, is titled “Standard Information in Handbooks”, and if you follow subpar A, B, C, and D it lists the standards that are required in all handbooks. Paragraph 16 B explains what the standard is for Exhibit 1 for all handbooks, “Reports, Forms, Abbreviations and Redelegations of Authority”.

In reviewing some of the newer handbooks, we have found that the Exhibit 1, Redelegation of Authority section, does not list all handbook referenced delegations, or the entire line of succession that is necessary to determine the next step that should be taken when someone is absent from a position. For example, 1-TAP only shows delegation from the CED to PT but doesn't list delegation from the COC to CED. 1-LFP list only one of the delegations contained in the handbook, “COC may delegate authority to CED's to approve only routine CCC-853's with supporting documentation; Important: CEDs will not be delegated authority to disapprove any CCC-853”. The authority to review CCC-855 eligibility is missing along with the delegation to recalculate assistance based on the lesser of reported or determined acreage within tolerance without explanation. 8-LP shows “redelegation of authority is provided in paragraph 2”, but there are no details specified. It references Handbook 16-AO, which lists redelegation basics but does not list any actual redelegations. This can be confusing and frustrate some employees.

NASCOE recommends all Redelegation of Authority references be listed in Exhibit 1 for every handbook to facilitate locating each delegation and identifying line of succession on the Delegation of Authority. The handbooks are an important tool in our daily work, and adhering to standardization requirements will help with training new PTs and CEDTs as they begin their careers, as well as save valuable time for seasoned employees who might be working with less familiar programs.

FSA Response:

DAFP will review all of our handbooks to ensure that they are following the standards in paragraph 16B. If changes are necessary, amendments will be issued to provide the information being requested.

Resolution:

NASCOE accepts this response.

Item 5:**Issue:**

Currently, the only telework policy guidance is Notice PM-3056 that became obsolete January

1, 2023. This has created inconsistencies in the policy implementation due to lack of current guidance from an active notice or policy written in a handbook.

NASCOE Recommendation:

NASCOE requests that the Telework policy in Notice PM-3056 (following DR 4080-811-002) be reissued and maintained as current until the policy is published in a handbook. We are also requesting the Telework agreement be put into the 34-PM handbook to be policy for supervisors to better implement procedure going forward.

FSA Response:

At this point in time, FSA is holding on our current telework policy. DAFO has instructed states that they are to still be following the telework guidance in Notice PM-3056.

Resolution:

DAFO announced that there is a new notice regarding telework policy in the works with hopes of being cleared in the coming months. NASCOE will submit their concerns in PM-3056 so DAFO may address those items if possible in the upcoming notice.

Item 6

Issue:

Employees eligible for retirement who are unsure of their retirement intentions are concerned about being able to use the COVID exigency leave that was allowed to be carried over by January 10, 2025. If they elect to not retire, then the carry over leave will need to be forfeited. Due to this, those employees will choose to retire to be paid for the carryover leave versus continuing to work and forfeiting the carryover leave. There are some of those employees who would consider a later retirement date if they did not have to forfeit their carryover leave.

NASCOE Recommendation:

NASCOE recommends the agency allow this type of carryover to be paid out and/or allow an extension to use the carryover leave due to the COVID exigency.

FSA Response:

OPM regulations do not permit the agency to pay out COVID restored leave. With the Department's termination of the COVID emergency, FSA is not authorized to further extend the deadline for use of COVID-restored leave. After using any accrued comp leave, if applicable, employees are encouraged to use COVID restored leave before annual leave to minimize potential forfeiture of leave.

Resolution:

NASCOE accepts this response.

Item 7

Issue:

County Offices have found the procedure for transmitting documents for Nationwide Customer Service varies between programs and is sometimes not addressed in handbooks. Inconsistency in policy has led to confusion, redundant efforts, and unnecessary costs for FSA.

One specific example comes from 2-CP (Rev. 16), Par. 102. The handbook instructs the office to immediately FAX a copy of a signed FSA-578 and map to the administrative county, mail the original signed FSA-578 and map to the administrative county, and maintain a copy of the documents as well.

NASCOE Recommendation:

NASCOE recommends FSA update, consolidate, and standardize the transfer of completed forms between offices. An update to 1-CM (Rev. 3) should be made to cover all cases and other handbooks should have language removed as needed. The 1-CM (Rev. 3) update should outline procedure for both counties involved in the transaction. Specific changes that we would like to see included:

1. Remove language that specifically states which transmittal method must be used. Some handbooks currently say FAX and others currently say email. Offices should be allowed to work together to determine the best transmittal method for them and their records. This would allow for transmitting using fax, email, box, or other approved applications.
2. Removing language requiring mailing of original forms. In most cases the scanned document is sufficient, and the original mailed form is simply an unnecessary expense.
3. Clarification on policy for the copy maintained in the transferring office. Is this copy considered an “extra copy” (non-record), should it be maintained under CMPF-2-c, or something different?

Suggested language:

Nationwide Customer Service State and County Office Action

State and County Offices that accept documents for Nationwide Customer Service will work with the administrative county to ensure the timely transmittal and processing of the documents. The sending office must complete all the following:

- *Scan and review the documents for legibility and completeness before transmitting to the administrative office.*
- *Transmit a copy of the documents to the administrative county by close of business the next business day. The preferred method of transmittal is email, but other methods agreed by both offices can be used. If a legible scan of*

documents cannot be achieved, a copy will be made for the sending office and the original documents will be mailed to the administrative office.

- *Maintain a copy of the transmitted documents until the administrative office has confirmed receipt and accepted responsibility for the record. Once the administrative office has confirmed receipt and accepted responsibility for the records, these copies are considered extra copies and will be handled in accordance with 32-AS.*

The receiving office must complete all the following:

- *Review documents for legibility and completeness.*
- *Respond to the sending office confirming receipt and accepting responsibility of the record by close of business the next business day.*
- *Maintain the record in accordance with 32-AS.*

After this update has been made to 1-CM (Rev. 3), language for Nationwide Customer Service can be removed from specific handbooks as changes are made. Handbooks known to contain language are:

- 1-ARCPLC, Par. 49
- 2-CP, Par. 102
- 5-ERP, Par. 145
- 2-LFP, Par. 29 E

FSA Response:

We agree that there is a lack of standardization across programs for Nationwide Customer Service and concur with this recommendation. The original intent was to provide guidance in the program handbook that was applicable and utilizing Nationwide Customer Service and not require the employee to have to reference an additional handbook external to the program they are working with. We will work to standardize and incorporate the procedure into 1-CM and remove from program specific handbooks.

Resolution:

NASCOE accepts this response.

Item 8:

Issue:

Handbook 2-CRP, paragraphs 663 and 683, authorizes the use of CRP acreage under Non-Emergency and Emergency Haying and Grazing.

Also, in 2-CRP, paragraph 681.5, states when a county reaches D2 for 8 consecutive weeks or D3 on the US Drought Monitor then a county will trigger for the Livestock Forage Program (LFP). Although this program is beneficial to our producers, it complicates the rules and regulations of the CRP Emergency Haying and Grazing Provisions.

Once a county triggers for, or qualifies, to implement LFP and Emergency Haying and Grazing is permitted, a producer can graze during the Primary Nesting Season (PNS) at a reduced stocking rate and hay outside of the PNS with a restriction of only cutting 50% of the acreage. While these regulations can be found in the sited handbook references, we feel that the guidance provided is hard to follow and somewhat vague, which can lead to misinterpretation. In addition, livestock producers are being asked to further restrict haying and/or grazing as the drought conditions become worse.

NASCOE Recommendation:

NASCOE is requesting that 2-CRP (Rev. 6) be amended to better clarify Emergency Haying and Grazing during extreme drought conditions when LFP is triggered. Haying and grazing of CRP acreage should not be further restricted as the drought worsens.

FSA Response:

The more restrictive haying and grazing policy is required when payments are authorized for a county under Livestock Forage Program (LFP). This is based on statutory language found in Sec. 1233(b)(1)(B)(II) and (III) and NEPA analysis (SPEIS).

Paragraph 681.5 was added to 2-CRP with Amendment 9 (February 10, 2023) to provide guidance on emergency haying and grazing during extreme drought conditions. To further assist state and county offices, the Conservation Division created a spreadsheet which identifies counties authorized for LFP during the current calendar year and counties who reached D2 or D3 based on the U.S. Drought Monitor. A link for this spreadsheet is provided in paragraph 681.5, however we see now that it needs to be updated following recent changes to the DAFP SharePoint. Until 2-CRP policy is updated, States and County Offices can access the 2024 report through the CD SharePoint page at [FPAC-FSA-CD - Home \(sharepoint.com\)](#) by selecting “Emergency Haying and Grazing CRP – D2 Authorized” through either of the State or County Office Resources links and scrolling down to the shared documents.

The Conservation Division has also created a CRP Non-Emergency and Emergency Haying and Grazing fact sheet which provides a crosswalk between this CRP policy and the conservation practices. This fact sheet is available on the CD SharePoint through the “Emergency Haying and Grazing CRP – D2 Authorized” link and is provided here for convenience [FPAC-FSA-CD-County - FSA nonemergency emergencyhaying factsheet 22.pdf \(sharepoint.com\)](#). To assist the Conservation Division with clarifying non-emergency and emergency haying and grazing policy, please provide specific items requiring updates or identify additional tools or guidance that may help states and counties determine the applicability of non-emergency and emergency haying and grazing provisions.

Resolution:

DAFP noted that the SharePoint site in the tip sheet has some issues reading LFP counties and populating that correctly, but they believe they have gotten those issues resolved. Currently policy aligns with statutory law; however, DAFP has asked NASCOE to review and let them

know if there are any discrepancies in the current policy and how the law pertaining to CRP is expressed. NASCOE provided an information table to the DAFP Conservation staff to share with field offices in assisting with the haying/grazing policies that are currently set.

Item 9

Issue:

Handbook 2-CP allows for the acceptance of RMA/CIMS data to satisfy the requirement for a late-filed FSA-578 if the crop information was reported timely to RMA. 2-CP Par. 27 B states RMA data must be CIMS data and not crop insurance agent records. The issue is, although a producer has submitted their information to RMA timely, the information is not being loaded into CIMS timely, by RMA. Although procedure allows for the use CIMS data, the process cannot be utilized by FSA because the data is not making to the CIMS software, this particularly impacts producers with citrus tree insurance.

NASCOE Recommendation:

NASCOE is requesting an amendment to 2-CP Par. 27 to accept crop insurance paperwork (provided by the producer and/or crop insurance agent) as an option to not charge a late-file fee. County offices across the country would agree that in most circumstances FSA is charging a late-file fee to producers when the information was indeed reported timely to crop insurance. Furthermore, we feel strongly that if we can use crop insurance records for failed or prevent plant acres then we should amend policy to accept them in the case that RMA data isn't timely reported to CIMS. 2-CP (Rev. 16) Par. 37E states: "County offices that accept a prevented planted claim (CCC-576), Part B more than 15 calendar days after the final planting date can consider CCC-576, Part B timely filed, regardless of when it is received, if the producer has crop insurance coverage for the crop and timely filed a prevented planted claim to the insurance company. Acceptable RMA data used to accept a late-filed claim includes information in CIMS showing a timely filed prevented planting claim to RMA. *If CIMS does not provide data to support producer's certification or prevented planted acreage on FSA-578 and CCC-576, it is the producer's responsibility to provide proper evidence that the prevented planted claim was filed timely with the insurance company.*" However, when it comes to late filed FSA-578s, Par. 27 does not allow for using producer provided RMA data from their agent. This results in an excessive burden on both the COF to collect the late-file fee, complete farm visits while evidence of the crop is available, seeking COC approval, and then to find CIMS data later to refund the late-file farm visit fee to the producer.

It has also been noted that crop insurance data shared through CIMS needs to be the same data we require for an FSA-578 so it can be used by both agencies. For example, on oranges RMA just collects acres. However, since this is a TAP eligible crop, we need them to collect tree counts, age, and spacing. We also load the tree acres not just the whole field acreage, while land acreage is most common in citrus tree insurance.

NASCOE's position is to amend 2-CP Par. 27 to be consistent with the policy in Par. 37E, utilizing CIMS data OR producer supplied insurance data. This will allow more efficient program delivery by the COF, increased service to producers, and reduce repetitive work (particularly in our citrus states).

FSA Response:

This current policy was developed with input from the field in a prior acreage reporting taskforce. However, we will review this recommendation with the current taskforce and RMA to determine any issues with implementation. NASCOE does have representation on the current acreage reporting taskforce, and we will provide an update the progress to reach this recommendation.

Resolution:

NASCOE accepts this response.

Item 10

Issue:

The county office is required to make three attempts at sending the IRS the IRS-3210 and CCC-941 before STO personnel can assist in making an AGI determination. This is a time-consuming and is creating more work for the county office staff as they are having to get new AGIs, because the producer's signatures have reached the 120 days the IRS will not accept although it was submitted timely.

NASCOE Recommendation:

NASCOE feels that this needs to be changed to only require the county offices to send the transmittal and AGI one time, if the IRS does not make the determination in 120 days, then it should be sent to the STO for attention.

FSA Response:

We acknowledge this process is cumbersome for the county office even when there are no delays, but when the process is followed, determinations are generally received without impact to the producer which has been the goal of this policy. By statute, IRS cannot accept a signature on a CCC-941 that is more than 120 calendar days old. In implementation of this recommendation, it most likely would result in the need to obtain additional 941s from the producer. The AGI verification process is currently being reviewed and we are in discussions with IRS for process improvements. The goal is to alleviate fax issues we are currently dealing with and reduce the staff impact of this process.

Resolution:

NASCOE accepts this response.

Item 11:

Issue:

It is inconvenient and time consuming, presently, for informing producers about the sequestration rate being deducted from their program payment amount. Currently, the ECPR, for programs with sequestration rate deductions, does not include the sequestration rate as a line item. If it is not written down by a county office employee, or the producer, then the producer sees a payment for a different amount than what their ECPR states. Many COF employees take the time to provide that information to the producers, but this is being completed by either making labels with the sequestration rate and/or COF employees quickly calculating the deduction and new total for the producer and writing down the information. However, these options are time consuming when the office is most likely already overwhelmed with the regular program implementation. If an employee doesn't have the time to write down the sequestration rate, the customer usually doesn't write it down as well and they call the office later to ask about the difference in their ECPR and payment. This adds more workload to the employee having to answer the call, find the ECPR, calculate the deduction, and confirm the new amount with the customer.

NASCOE Recommendation:

NASCOE is requesting that the National Office include line items on the ECPR for programs that have sequestration rate deductions. One line item showing the sequestration percentage rate, another line for the sequestration deduction and a final one showing the new payment total. Currently the ECPR has a broad statement saying this amount does not include reductions but nothing specific about sequestration. COF employees utilize several different means to share the sequestration information, but if this was implemented, we would have a smooth consistent process across the nation with little to no confusion. This will give the producer an accurate amount at the time of signing the application, will prevent manual math errors from the county office staff and reduce county office workload.

FSA Response:

Sequestration could be applied at various points in the payment calculation depending on the program, therefore, putting it on the ECPR would result in inaccurate or misleading payment calculations. For example, the ECPR does not include other types of payment reductions, but sequestration is applied for most programs after those reductions are applied to the payment. Adding it to the ECPR without the other reductions would overstate the reduction and possibly understate the payment amount.

Alternatively, for programs affected by sequestration, that information is included on the transaction statement sent to the producer which includes the legislative authority for the sequestration reduction and the rate applied. The COF could also supply the "Payment History Report – Detail" which includes all the types of reductions applied to each payment for the producer.

In addition, PDD is in the process of revising 9-CM and will ensure additional information about

sequestration reductions is included including the budget fiscal year rates. We may explore options through the communications team to develop a fact sheet that producers could access online for more information regarding sequestration.

Resolution:

DAFP agreed that 9-CM will be updated so that the current sequestration rates are out for field offices. Also, DAFP will work with program divisions to remove the policy requiring the delivery of the ECPR at the time an application is signed. Due to how sequestration is calculated based on different programs and the changing rate the final payment amount cannot be added to the ECPR at this time.

Item 12

Issue:

County offices do not have the ability to load CCC-36's (Assignment of Payment) & CCC-37's (Joint Payment Authorization) for multiple years at the same time when the Assignment(s) are received. The handbook 63-FI, Paragraph 64-A clearly states we must have these assignments and joint payments loaded immediately to establish the order of payment and, prior to payments being issued.

It can become frustrating and at times inefficient to not be able to load all the codes for all the years at the beginning of the Farm Bill or when a program opens. Some program codes are always available (we can load those codes for multiple years right away). However, most program codes are not always available. We highlight the years/ codes we get loaded then initial and date each time we update. So, what we end up with are two different binders: 1. that's organized by producer and are completed (past years) and 2. a binder with those years that can't be loaded yet due to the codes not being available (all years are on the same document).

The first issue it can cause is a filing nightmare and it can leave room for error. The more times an office touches the form(s), the more times we open the programs up for human error. With changes in personnel, office traffic, complexity of programs, the review of the previously filed CCC-36s and CCC-37s; each year can and will be missed. This type of shuffle can inadvertently cause the County Office to not follow handbook policy in 63-FI.

Another issue that can occur with programs such as LFP that can trigger a payment in a county in a short amount of time, possibly before codes are available. The Assignment(s) must be reconciled immediately to catch any payments that will be issued. During an emergency program such as this, the office(s) can be busy and dis-shuffled. There is a lot of room for error and Assignments can be missed.

NASCOE Recommendation:

We respectfully request to update the Financial Services software and policy in 63-FI to allow

for all years of a program to be entered into the software in the beginning year of the program. This will allow county offices to handle them one time, reduce errors, increase efficiency, and ultimately better serve the producers.

FSA Response:

FPAC Business Center (FBC) Financial Management Division (FMD) received a similar request in 2020 and have been developing functionality to allow users to enter multiple single year assignments and joint payment for eligible programs. Our goal is to have the functionality available to coincide with the new Farm Bill. We will be working with FBC Policy Division to evaluate whether the Forms CCC-36 and CCC-37 need to be updated to accommodate the new functionality and to complete related Handbook 63-FI updates. We will also be working with Deputy Administrator for Farm Programs (DAFP) to identify the eligible programs. FMD wants to ensure eligible programs and eligible years are available for the assignment and joint payment creation process. We will communicate the availability of the software via an Information Bulletin (IB) or Notice.

Resolution:

NASCOE accepts this response.