

For: State and County Offices

Preparing for Implementation of Direct Attribution

Approved by: Deputy Administrator, Farm Programs



1 Overview

A Background

The Food, Conservation, and Energy Act of 2008 (2008 Farm Bill) provides that the “Secretary shall issue such regulations as are necessary to ensure that the total amount of payments are attributed to a person by taking into account the direct and indirect ownership interests of the person in a legal entity that is eligible to receive the payments.”

EQIP and several other conservation programs administered by NRCS have been reading data from many of the same files and processes that will be used for FSA program payments under direct attribution. In working with NRCS to resolve problematic cases, a number of situations have been identified where data discrepancies **must** be rectified to ensure that the transition to direct attribution is smooth and payments to producers are not unnecessarily delayed.

B Purpose

This notice advises State and County Offices:

- of the general process that will be used to process program payments using direct attribution
- of reports that have been developed to assist in the cleanup of data files
- that the reports will be re-generated periodically to ensure that action is being taken to correct discrepancies
- that immediate action is required to ensure that problematic situations are fully identified and rectified by October 1, 2009.

| Disposal Date | Distribution |
|----------------------------|--|
| January 1, 2010 5-12-09 | State Offices; State Offices relay to County Offices |

2 General Information

A General Information About Forthcoming Implementation of Direct Attribution

Development of the web-based application for the permitted entity and joint operation file has not yet been completed and each County Office is required to record member information through the application on the S/36. For multi-county producers, each county records the information where the producer participates. This data is uploaded through the normal subsidiary upload process and resides centrally on the mainframe in Kansas City.

For direct attribution, it is critical that the data recorded in the 2009 joint operation and entity files is correct and is uploaded properly to the mainframe in Kansas City.

B Transition to Direct Attribution

A number of reports have been identified for situations that could impact producer payments as FSA transitions to direct attribution. These reports are described in further detail in the remainder of this notice.

C Review of the Joint Operation/Entity File Data on the Mainframe

In preparation for the implementation of direct attribution, various reviews have been completed on joint operation and entity file data residing on the mainframe in Kansas City. NRCS has also been reading data from the joint operation and entity file data on the mainframe through their implementation of EQIP, WHIP, and CSP.

In some cases, the data recorded in the joint operation/entity file on the S/36 has not uploaded properly to the mainframe which has created situations where shares do not equal 100 percent. Kansas City staff have conducted an analysis but have not been able to pinpoint an exact cause for this problem. It is believed that transmission records were possibly missed which creates a situation where the data on the S/36 and the data on the mainframe are out of sync.

Additionally, joint operation and entity file data is not recorded consistently from county to county for some multi-county producers.

It is critical that the joint operation and entity file data is accurate when payments are processed under direct attribution beginning October 1, 2009. Therefore, these conditions must be rectified. Reports have been developed to assist County Offices with this effort and each of the reports are described in further detail in the remainder of this notice.

2 General Information (Continued)

D Importance for Immediate Action

Although the reports are being posted almost 4 months before October 1, 2009, County Offices must recognize that is not a great amount of time to handle corrections for the following reasons.

- Annual rollover activities generally start around the middle of September; to have the data on the mainframe in time for rollover, the actual deadline is September 1.
- Updates to the joint operation and entity files are uploaded during the regular subsidiary upload/download cycle, which takes approximately 4 calendar days to 2 weeks depending on the timing of the update.

E Posting the Reports

The reports will be posted to the FSA Intranet and can be accessed by authorized FSA users at <http://dc.ffa.intranet.usda.gov/farmbill/ccf/default.htm>. The following table includes general information about each of the reports.

| Report Name | Description | Deadline for Completion for Direct Attribution | Approximate Date Initial Report Will Be Posted |
|--|---|--|--|
| Shares Less Than 100% | Report where the member shares on the mainframe in Kansas City do not equal 100%. | September 1 | May 12 |
| Shares Greater Than 100% | | | TBD |
| Shares Differ by County | Report for multi-county producers where the member shares are not recorded consistently in 2 or more counties. | | May 18 |
| Shares Not Recorded | Report for multi-county producers where the member shares are not recorded in the joint operation/entity file. | | May 18 |
| Entity Type Mismatch | Report of producers/members where the entity type on the S/36 does not match the business type recorded in SCIMS. | | May 18 |
| General Entity Members | Report where at least 1 member of a joint operation or entity has a "99" entity type. | | May 12 |
| 1 Member Joint Operations | Report of members of joint operations and limited partnerships where the member has a 100% share. | | May 18 |
| Resident Alien Report | Report that indicates individuals where the resident alien indicator in SCIMS is not set correctly based on the customer's citizen country. | October 1 | May 12 |
| Missing or Mismatch Entity Type on Mainframe | Report that indicates the entity type is not consistent for a senior entity between the entity and member records. | Sept 1 | May 18 |

The reports will be updated at the beginning of each month to ensure that the conditions are being resolved and to identify any additional situations that may occur. As each report is available, an e-mail message will be sent from PECD to all State Subsidiary Specialists. State Offices shall:

- ensure that County Offices are timely notified that the reports are available
- monitor the reports to ensure that action is being taken by County Offices
- contact PECD with questions.

3 Joint Operation/Entity File Shares Not Equal to 100 Percent

A Background

For payments affected by direct attribution, member data for joint operations and entities will be read from the mainframe based on data that has been uploaded from permitted entity and joint operation data recorded by the County Office on the S/36.

B Problem

A review of the 2009 joint operation and permitted entity file on the mainframe indicates that approximately 4,700 joint operations and entities have member shares that do not equal 100 percent. The S/36 software does not allow this condition to occur so it has been determined that missed transmissions are the likely reason the mainframe shares are incorrect.

C Description of Reports

Since County Office staff cannot review mainframe data, two reports have been created for review and follow up action. This table describes each report developed.

| Report | Conditions Reflected on Report |
|--------------------------|---|
| Shares Less Than 100% | <ul style="list-style-type: none">• Direct member shares of an entity or joint operation total less than 100 percent.• Direct member shares equal 100 percent but the shares for embedded members are less than 100 percent. |
| Shares Greater Than 100% | <ul style="list-style-type: none">• Direct member shares of an entity or joint operation exceed 100 percent.• Direct member shares equal 100 percent but the shares for embedded member exceed 100 percent. |

D Accessing the Reports

The reports will be posted to the FSA Intranet and can be accessed by authorized FSA users according to the following:

- access the Common Provisions website at <http://dc.ffasintranet.usda.gov/farmbill/ccc/default.htm>
- CLICK “Shares Less Than 100%” and “Shares Greater Than 100%”.

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3 Joint Operation/Entity File Shares Not Equal to 100 Percent (Continued)

E Report Information

The following information is provided on each report.

| Field | Description |
|------------------------|---|
| State Code | State and County Code for the county where the shares do not equal 100 percent. |
| County Code | |
| Entity Name | Name of the joint operation or entity. |
| Business Type | Entity type for the joint operation, entity, or member. |
| Member Name | Name of the member. |
| Direct Member Share | Member share for each direct member of the joint operation or entity. |
| Ownership Member Share | Member share for each member with a direct or indirect ownership interest in the joint operation or entity. |
| Last Update Date | Date the joint operation or entity data was last updated on the mainframe. |
| Sum of Shares | The sum of the shares of: <ul style="list-style-type: none">• direct members• direct and indirect members. |

F County Office Action

County Offices shall:

- access each report according to subparagraph 3 D
- compare the information on the report to the data on CCC-902 filed for the 2009 subsidiary year

Note: If representatives for the joint operation or entity have not filed CCC-902, County Offices shall review the most recently filed CCC-502 for comparison.

- update the 2009 joint operation or entity file according to 2-PL, if the member data in the system does not match the data on CCC-902 or CCC-502, as applicable.

If the 2009 data in the system matches the data on CCC-902 or CCC-502, County Offices shall take the following action:

- access the operation at the lowest member and update the record by ENTERING “U”
- continue to update at each level of the operation until the senior entity record is accessed
- update the senior entity by ENTERING “U”.

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4 Shares Not Loaded Properly for Multi-County Producers

A Background

For payments affected by direct attribution, member data for joint operations and entities will be read from the mainframe based on data that has been uploaded from permitted entity and joint operation data recorded by the County Office on the S/36.

If the joint operation or entity is a multi-county producer, then the member data will be read from the county designated as the multi-county control county only. Data cannot be read from the entity or joint operation file for the county where the payment is being processed.

Note: The multi-county control county is listed in the “multi-county” section of the MABDIG in the “Rc St & Cty” field.

B Problem

Because each County Office records information in the entity and joint operation files independently on the S/36, the possibility exists that data can be recorded differently from one county to the next. A review of the entity and joint operation file on the mainframe found the following inconsistencies for multi-county producers.

- A comparison of the member shares found that entities and joint operations had shares recorded differently in 2 or more counties.
- Member shares were not loaded in the entity or joint operation file for the designated multi-county “recording county”.

C Description of Reports

Since County Office staff cannot review mainframe data, two reports have been created for review and follow up action. This table describes each report.

| Report | Description |
|---|---|
| Shares Differ by County | <p>This report identifies joint operations and entities where member data is recorded differently from county to county for multi-county producers.</p> <p>Member data for a joint operation or entity should be consistent regardless of the number of counties where the joint operation or entity participates.</p> |
| Shares Not Loaded in the Recording County | <p>This report identifies joint operations and entities where member data has not been recorded by the County Office that is designated as the control/recording county for multi-county producers.</p> <p>Note: The control/recording county can be determined reviewing field “Rc St & Cty” in the multi-county section of the MABDIG.</p> |

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4 Shares Not Loaded Properly for Multi-County Producers (Continued)

D Accessing the Reports

The reports will be posted to the FSA Intranet and can be accessed by authorized FSA users according to the following:

- access the Common Provisions website at <http://dc.ffasintranet.usda.gov/farmbill/ccc/default.htm>
- CLICK “Shares Differ by County” and “Shares Not Recorded”.

E Report Information

The following information is provided on each report.

| Field | Description |
|-----------------------------|---|
| Recording/Control County | State and county code that is designated as the multi-county recording/control county. Note: This county may differ from the recording county in the web-based eligibility system. |
| State Code | State and County Code where: <ul style="list-style-type: none">• member data is recorded for the “shares differ by county” report• member data is not recorded for the “shares not recorded” report. |
| County Code | |
| Joint Operation/Entity Name | Joint operation or entity name. |
| Entity Type | Entity type for the joint operation or entity. |
| Last Update Date | Date the joint operation or entity data was last updated on the mainframe. |

The following fields are also included on the “Shares Differ by County” report.

| Field | Description |
|----------------|--|
| Name of member | Member name. |
| Entity Type | Entity type for the member. |
| Actual share | Member share for each member of the joint operation or entity. |

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4 Shares Not Loaded Properly for Multi-County Producers (Continued)

F County Office Action

County Offices shall:

- access each report according to subparagraph 4 D
- compare the information on the report to the data on CCC-902 filed for the 2009 subsidiary year to ensure that the data in the system is recorded properly

Note: If representatives for the joint operation or entity have not filed CCC-902, County Offices shall review the most recently filed CCC-502 for comparison.

| FOR the... | County Offices shall... |
|---|--|
| "Shares Differ by County" report | <ul style="list-style-type: none">• contact other County Offices where the producer participates• determine which shares are correct• update the 2009 joint operation or entity file member shares according to 2-PL, as applicable. <p>Note: The CCC-502 or CCC-902 data in the system should be consistent in each county where the producer participates. Farming operations are not allowed to designate shares differently by crop, program, or county. If it is determined that a more thorough review is required, the joint operation or entity shall be deleted from the entity and/or joint operation file by all counties until the review is completed.</p> |
| Shares Not Loaded in the Recording County | <p>take either of the following actions, as appropriate:</p> <ul style="list-style-type: none">• county listed as the control/recording county shall record the joint operation or entity data according to CCC-902 filed by the farming operation• change the recording county to another county for 2009, according to 2-PL, paragraph 191. |

Note: The multi-county "recording/control" county shall be responsible for ensuring that other counties are contacted. The multi-county control county is listed in the "multi-county" section of the MABDIG in the "Rc St & Cty" fields.

5 Entity Type Mismatch

A Background

1-CM, paragraph 196 provides information for updating business types in SCIMS, including ensuring that joint operation and/or entity file data is deleted prior to changing a business type in SCIMS.

Note: If a customer is active in the joint operation/entity file, a message is sent to the system printer in every County Office that is linked to the customer and alerts County Offices that the entity type has been changed. Message **“Please change the SCIMS Entity Type back. ID is Active on Permitted Entity file.”** is listed on the printed report.

B Problem

If the joint operation or entity file data was not deleted before changing a business type in SCIMS, the corrected business type does not download to the S/36, which results in a mismatch between SCIMS and the joint operation/entity file data.

These discrepancies must be corrected to ensure that payments are processed properly. Failure to correct these discrepancies will result in payments being rejected through the direct attribution process.

C Description of Report

The “entity type mismatch” report identifies joint operations, entities, and members where the SCIMS business type for 2009 does not match the entity type on the mainframe for 2009.

D Accessing the Report

The report will be posted to the FSA Intranet and can be accessed by authorized FSA users according to the following:

- access the Common Provisions website at <http://dc.ffasintranet.usda.gov/farmbill/ccf/default.htm>
- CLICK “Entity Type Mismatch”.

5 Entity Type Mismatch (Continued)

E Report Information

The following information is provided on each report.

| Field | Description |
|---------------|---|
| State Code | State and County Code where the entity type mismatch is identified. |
| County Code | |
| Name | Joint operation, entity, or member name. |
| Business Type | Business type for the joint operation, entity, or member from SCIMS. |
| Entity Type | Entity type for the joint operation, entity, or member on the joint operation or permitted entity file. |

F County Office Action

County Offices shall:

- access the report according to subparagraph 5 D
- follow this table to determine how to update the joint operation or entity file information.

| IF the... | THEN... | | | | | | |
|--|--|--|---------|---------|--|-------------|--|
| <ul style="list-style-type: none"> • SCIMS business type is wrong • S/36 entity type is correct in the entity file | correct the SCIMS business type. See 1-CM. | | | | | | |
| <ul style="list-style-type: none"> • SCIMS business type is correct • S/36 entity type is wrong in the entity file | <ul style="list-style-type: none"> • customer must be deleted from the 2009 entity or joint operation file in all counties where the customer is active. See 2-PL. <p>Note: This must be coordinated with other County Offices where the customer is linked.</p> <ul style="list-style-type: none"> • once the joint operation/entity file data is deleted in all counties, one County Office user shall access the customer's record in SCIMS and CLICK "Submit" to send a download record to the S/36 • each County Office shall print a 2009 MABDIG to ensure the correct entity type is listed on page 1 of the MABDIG. <table border="1"> <tr> <th>IF the entity type on the MABDIG is...</th><th>THEN...</th></tr> <tr> <td>correct</td><td>re-enter the joint operation/entity file data.</td></tr> <tr> <td>not correct</td><td> <ul style="list-style-type: none"> • verify that each County Office where the customer is linked has deleted the joint operation or entity from the joint operation/entity file • re-update SCIMS by CLICKING the "Submit" button. </td></tr> </table> | IF the entity type on the MABDIG is... | THEN... | correct | re-enter the joint operation/entity file data. | not correct | <ul style="list-style-type: none"> • verify that each County Office where the customer is linked has deleted the joint operation or entity from the joint operation/entity file • re-update SCIMS by CLICKING the "Submit" button. |
| IF the entity type on the MABDIG is... | THEN... | | | | | | |
| correct | re-enter the joint operation/entity file data. | | | | | | |
| not correct | <ul style="list-style-type: none"> • verify that each County Office where the customer is linked has deleted the joint operation or entity from the joint operation/entity file • re-update SCIMS by CLICKING the "Submit" button. | | | | | | |

6 General Entity Members

A Background

The 2008 Farm Bill provides that each legal entity receiving payments shall provide the name and Social Security number of each person, or the name and taxpayer identification number (TIN) of each legal entity that holds or acquires an ownership interest in the legal entity.

4-PL has been amended to specify that each legal entity that submits a contract for a program or an application for payment must provide COC the name, address, and TIN of each person and embedded legal entity that holds or acquires any interest, directly or indirectly, in the entity earning payment.

2-PL, paragraph 418 provides procedure for recording “members of” records for special case entities.

B Problem

Because of the attribution requirements of the 2008 Farm Bill, “members of” records will no longer be allowed for entities with more than 100 members. As a result, all members of a farming operation must be recorded in the joint operation and entity file.

Additionally software for the direct attribution process will no longer check for member information for the following entities:

- church, charities, or non-profit organizations
- Indian tribal ventures.

C Description of Report

The “general entity member” report identifies joint operations and entities where at least one member has a “99” entity type.

D Accessing the Reports

The report will be posted to the FSA Intranet and can be accessed by authorized FSA users according to the following:

- access the Common Provisions website at <http://dc.ffasintranet.usda.gov/farmbill/ccc/default.htm>
- CLICK “General Entity Members”.

6 General Entity Members (Continued)

E Report Information

The following information is provided on each report.

| Field | Description |
|--------------------|---|
| State Code | State and County Code where the joint operation is recorded where at least one member has a "99" entity type. |
| County Code | |
| Entity Name | Joint operation or entity name. |
| Entity Type | Entity type for the joint operation or entity. |
| Member Name | Name of the member with the "99" entity type. |
| Member Entity Type | Entity type for the member. |
| Member Share | Ownership share for the member in the farming operation. |
| Last Update Date | Date the joint operation or entity data was last updated on the mainframe. |

F County Office Action

County Offices shall:

- access the report according to subparagraph 6 D
- review the information on the report to determine if the joint operation or entity is receiving program benefits from either FSA or NRCS
- follow this table to determine how to update the joint operation or entity file information.

| IF the joint operation or entity is... | THEN County Offices... |
|--|---|
| <ul style="list-style-type: none"> • earning a conservation payment for a contract approved before October 1, 2008 for programs such as CRP and EQIP, and • not earning any other program benefits | are not required to make changes to the joint operation or entity file data. |
| <ul style="list-style-type: none"> • earning a conservation payment for a contract approved before October 1, 2008 for programs such as CRP and EQIP, and • earning other program benefits | are required to: <ul style="list-style-type: none"> • delete the member with the "99" entity type • update the 2009 joint operation or entity file data with all members of the farming operation down to the 5th member level, if applicable. |
| not earning any program benefits administered by FSA or NRCS | delete the joint operation or entity file data. |

7 One Member Joint Operations and Limited Partnerships

A Background

4-PL includes the following definitions for joint operations and limited partnerships.

Joint Operation means a general partnership, joint venture, or other similar business organization in which 2 or more individuals or entities pool their resources, such as land, labor, capital, management, and equipment to conduct the operation for a common purpose that the group intends to carry out, with sharing of the profits and losses.

Limited Partnership means both of the following for payment limitation purposes:

- at least 1 general partner entrusted with managing and controlling the partnership's business
- at least 1 limited partner.

B Problem

A review of the joint operation and entity files found that there were joint ventures with only 1 member recorded with a 100 percent ownership share. Since the definitions provided in subparagraph A specifically provide that at least 2 members must be involved, the farming operation does not meet the definition of a joint operation.

C Description of Report

The "1 member joint operations" report identifies joint operations and limited partnerships that have 1 member recorded in the permitted entity and joint operation file with a 100 percent share.

D Accessing the Reports

The report will be posted to the FSA Intranet and can be accessed by authorized FSA users according to the following:

- access the Common Provisions website at <http://dc.ffasintranet.usda.gov/farmbill/ccc/default.htm>
- CLICK "1 Member Joint Operations".

7 One Member Joint Operations and Limited Partnerships (Continued)

E Report Information

The following information is provided on each report.

| Field | Description |
|------------------|--|
| State Code | State and County Code where the joint operation or limited partnership is recorded with only 1 member. |
| County Code | |
| Entity Name | Joint operation or limited partnership name. |
| Entity Type | Entity type for the joint operation or limited partnership. |
| Member Name | Joint operation or limited partnership name. |
| Last Update Date | Date the joint operation or limited partnership data was last updated on the mainframe. |

F County Office Action

County Offices shall:

- access the report according to subparagraph 7 D
- review the information on the report to determine if the joint operation or limited partnership is receiving program benefits
- follow this table to determine how to update the joint operation or entity file information.

| IF the joint operation or limited partnership is... | THEN County Offices shall... | |
|--|--|--|
| earning program benefits administered by FSA or NRCS | review the documentation on file in the County Office to determine if the data recorded in the system matches the documentation filed. | |
| | IF the data in the system... | THEN County Offices shall... |
| | does not match the documentation on file | correct the data in the system according to the documentation on file. |
| | matches the documentation on file | <ul style="list-style-type: none"> • contact representatives of the farming operation to advise them that their operation does not meet the definition of a joint operation or limited partnership and that additional documentation is required • delete the joint operation or entity from the joint operation and permitted entity file, as applicable. • not re-record the joint operation or entity file data into the system until the discrepancy regarding the farming operation is resolved. |
| not earning any program benefits administered by FSA or NRCS | delete the joint operation or limited partnership from the system. | |

8 Invalid Resident Alien SCIMS Data

A Background

SCIMS provides 2 fields for determining whether a customer is considered a U.S. citizen or legal resident alien. These fields must be updated properly in order to ensure that foreign person provisions are handled correctly through direct attribution. Fields that must be updated properly in SCIMS are:

- Citizenship Country
- Resident Alien.

B Problem

SCIMS does not currently have a validation to ensure that the resident alien field is updated properly based on the citizen country that is recorded by the user. Software will be developed for future implementation to ensure the resident alien field is defaulted to:

- “Unknown or N/A” if the citizenship country indicates the customer is a citizen of the United States or a U.S. territory
- “No” if the customer is not a citizen of the United States or a U.S. territory.

Until the software is implemented, a report has been generated to identify customers that have invalid resident alien information based on the citizenship country recorded.

C Description of Report

The “resident alien” report identifies those customers with either of the following conditions:

- Customer is considered a United States citizen but resident alien is “No”
- Customer is not considered a United States citizen and resident alien is “Unknown or N/A”.

Customers with the following for the citizenship country are considered United States citizens:

- United States
- Federated States of Micronesia
- Northern Mariana Islands
- Guam
- Puerto Rico
- Virgin Islands.

8 Invalid Resident Alien SCIMS Data (Continued)

D Accessing the Report

The report will be posted to the FSA intranet and can be accessed by authorized FSA users according to the following:

- access the Common Provisions website at <http://dc.ffasintranet.usda.gov/farmbill/ccc/default.htm>
- CLICK “Resident Alien Report”.

E Report Information

The following information is provided on each report.

| Field | Description |
|----------------------|---|
| State Name | State and County name where the customer is linked in SCIMS. Note: A customer is listed for each county that has a legacy link to the customer. |
| County Name | |
| Common Customer Name | Name of the customer. |
| Country | Designated citizenship country for the customer. |
| Resident Alien Cd | Resident alien indicator for the customer. |

8 Invalid Resident Alien SCIMS Data (Continued)

F County Office Action

County Offices shall:

- access the report according to subparagraph 8 D
- review the documentation on file in the County Office for the customer to determine if the citizenship country is updated properly in SCIMS
- correct the citizenship country if the data recorded in SCIMS is in error.

If the citizenship country data in SCIMS matches documentation on file in the County Office, County Offices shall take the following action to correct the resident alien data.

Note: If the customer is linked to more than one county, County Offices shall coordinate to ensure that SCIMS is updated correctly.

| IF the customer has a citizenship country... | AND documentation such as Form I-551 has... | THEN update the resident alien field in SCIMS to... |
|--|---|---|
| of any of the following: <ul style="list-style-type: none"> • United States • Federated States of Micronesia • Northern Mariana Islands • Guam • Puerto Rico • Virgin Islands. | | “Unknown or N/A”. |
| any other country | been filed to support that the customer is a legal resident alien, according to 4-PL, paragraph 107 | “Yes”. |
| | not been filed to support that the customer is a legal resident alien | “No”. |
| of unknown | | “No”. |

9 Missing or Mismatch Entity Types on the Mainframe

A Background

For payments affected by direct attribution, member data for joint operations and entities will be read from the mainframe based on data that has been uploaded from permitted entity and joint operation data recorded by the County Office on the S/36.

B Problem

A review of the joint operation and permitted entity file on the mainframe indicates that records exist for both of the following conditions:

- missing entity types for senior entities and/or members
- mismatched entity types between the senior entity and member record.

Member records on the joint operation and permitted entity file are tied to the senior payment entity by matching the ID number, ID type, and entity type. In some cases the entity type for the senior entity for the member record does not match the entity type for the record for the senior entity.

Example: ABC Corporation is the senior entity with 2 members. The following is an illustration of how the member record would look generally.

| Senior Entity Data | | | Member Data | | | |
|--------------------|---------|-------------|-------------|---------|-------------|--------|
| ID Number | ID Type | Entity Type | ID Number | ID Type | Entity Type | Share |
| 123456789 | E | 04 | | | | |
| 123456789 | E | 04 | 234567890 | S | 01 | 0.5000 |
| 123456789 | E | 04 | 345678901 | S | 01 | 0.5000 |

However, in some cases the data may look as follows.

| Senior Entity Data | | | Member Data | | | |
|--------------------|---------|-------------|-------------|---------|-------------|--------|
| ID Number | ID Type | Entity Type | ID Number | ID Type | Entity Type | Share |
| 123456789 | E | 04 | | | | |
| 123456789 | E | 02 | 234567890 | S | 01 | 0.5000 |
| 123456789 | E | | 345678901 | S | 01 | 0.5000 |

The S/36 software does not allow this condition to occur so it has been determined that missed transmissions are the likely reason the mainframe data is incorrect following changes to entity type.

C Description of Reports

The “missing entity type” report identifies joint operations, entities, and members where the SCIMS business type for 2009 does not match the entity type on the mainframe for 2009.

9 Missing or Mismatch Entity Types on the Mainframe (Continued)

D Accessing the Reports

The reports will be posted to the FSA intranet and can be accessed by authorized FSA users according to the following:

- access the Common Provisions website at <http://dc.ffasintranet.usda.gov/farmbill/ccc/default.htm>
- CLICK “missing entity type”.

E Report Information

The following information is provided on each report.

| Field | Description |
|------------------|--|
| State Code | State and County Code for the county where the joint operation/entity file data is recorded. |
| County Code | |
| Entity Name | Name of the joint operation or entity. |
| Business Type | Entity type for the joint operation or entity. |
| Last Update Date | Date the joint operation or entity data was last updated on the mainframe. |

F County Office Action

County Offices shall:

- access each report according to subparagraph 8 D
 - ensure that the data recorded in the joint operation or entity file matches the data on the CCC-902 filed for the 2009 subsidiary year
- Note:** If representatives for the joint operation or entity have not filed CCC-902, County Offices shall review the most recently filed CCC-502 for comparison.
- update the 2009 joint operation or entity file according to handbook 2-PL if the member data in the system does not match the data on the CCC-902 or CCC-502, as applicable.

If the data in the system matches the data on the CCC-902 or CCC-502, County Offices shall take the following action for the 2009 subsidiary year.

- access the operation at the lowest member and update the record by ENTERING “U”
- continue to update at each level of the operation until the senior entity record is accessed
- update the senior entity by ENTERING “U”.