

For: State and County Offices

Representative Capacity Review

Approved by: Acting Deputy Administrator, Farm Programs



1 Overview

A Background

In April 2013, MIDAS Release 1 introduced the Representative Capacity (RepCap) functionality in CRM Business Partner. This process replaced the retired Fiduciary software, and became the new system of entry/system of record for the following fiduciary or signature authority relationships:

- FSA-211 Power of Attorney
- Non-FSA Power of Attorney
- Signature Authority
- Guardianship
- Conservatorship
- Marriage
- Revoked Spousal Authority.

In the 8 years since this functionality was made available, County Offices have been judiciously loading and maintaining the RepCap information according to 11-CM, Part 3, Section 3. Until recently, that information was only available for reference in the Business Partner records and was not shared with any external system.

In late 2020 and early 2021, shared services were developed to make RepCap data available for use by Farmers.gov and other FSA systems through a Representative Authority for Producers (RAP) service. This means the RepCap data (which is loaded and stored in Business Partner) is now being shared with external FSA systems and in the future will be shared with other agencies. Therefore, it is critical that County Offices ensure that data is still valid and correctly loaded.

Disposal Date	Distribution
June 1, 2022	State Offices; State Offices relay to County Offices

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1 Overview (Continued)

B Purpose

This notice makes Field Offices aware of:

- the sharing of RepCap data with external systems
- action necessary to review, and confirm or correct RepCap data in CRM Business Partner
- the reminder to follow Notice CM-828 for loading RepCap Signature Authority for SSN Owners of Revocable Trusts or LLC's.

2 RAP Services

A Overview

RAP is the logic of using Business Partner RepCap relationships and Business File Entity Member data to systematically allow customers to access data for, and act on behalf of another customer or for their own entity.

Business Partner RepCap will provide data for the following.

- FSA-211 Power of Attorney.
 - The common combination of “All Current & Future Programs” and “All Actions” as well as the combination of “NRCS Conservation” and “All Actions” are currently included in RAP.
 - FSA-211 Powers of Attorney with other combinations of options selected within Sections A and B are not included in RAP at this time.
- Non-FSA Power of Attorney (future RAP release).
- BP Signature Authority (non-entity members).

Types of BP Signature Authority	
Administrator	Partner
Agent	President
Chairman	Secretary
Co-Trustee	SSN Owner of LLC
Director	SSN Owner of Revocable Trust
Executor	Trustee
Manager	Vice President
Officer	

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2 RAP Services (Continued)

A Overview (Continued)

- Conservatorship (future RAP release).
- Guardianship.
- Spousal Authority.
- Revocation of Spousal Signature Authority.

Business File will provide signature authority data for entity members.

Only RepCaps with a status of “Active” are made available in RAP service to downstream systems. Only entity members with signature authority on a Farm Operating Plan with a status of either “Filed” or ‘Determined’ are available to downstream systems.

Downstream systems will be using this data to allow a customer to login and legally view another customer’s data, as well as sign on their behalf; therefore, **it is imperative that this data is correct.**

B Systems Using RAP

Currently, Farmers.gov and QLA are the only 2 systems using RAP data, with other FSA systems updating to use RAP data later this year and NRCS systems in the future as well.

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3 Reviewing RepCap Data in Business Partner Customer Records

A Search for Customer Records With RepCap Entries

County Offices can quickly run reports in BP to identify all the customers with RepCap entries for their County Office or Service Center. The complete instructions are in 11-CM, Part 2 but the following steps are provided as a quick reference for building the custom report.

Step	Action
1	In the BP Customer Search Screen, use the drop-down menu on any of the Search Criteria line items and select "Relationship".
2	Use the drop-down menu on the Search Values to select the intended RepCap. Note: Always choose the 'Has' RepCap because it will return the list of grantors (customers who have granted authority to another person or entity). The RepCap record can only be edited from the "Grantor's" customer record.
3	Use the drop-down menu on any of the Search Criteria line items and select "Death Confirmation Flag".
4	Use the drop-down menu on the Search Values for Death Confirmation Flag to select "Not Set". Note: This search criteria will exclude all customers that are deceased, which will eliminate RepCaps from the report which were revoked because of death, making the report more manageable.
5	Use the drop-down menu in "Search Values" to select the intended State and county for "Program Participation" (or Associated County). If multiple counties are necessary, add extra line items as necessary.
6	Increase the "Maximum Number of Results", to ensure that all records can be viewed that meet the search criteria. The default value is 100.
7	Click "Search" and review the resulting records.

3 Reviewing RepCap Data in Business Partner Customer Records (Continued)

A Search for Customer Records With RepCap Entries (Continued)

The screenshot shows a search interface titled "Search: Customers". Under the "Search Criteria" section, there is a note: "* Specifying values for multiple fields will narrow the search results, while specifying different values for the same broaden the search results." Below this, there is a "Search for:" dropdown menu set to "All Accounts". The search criteria are organized into two columns. The first column contains: "Relationship" (1), "Death Confirmed Flag" (3), "State Prog Participation", "County Prog Participation", and "Service Center". The second column contains: "is" (operator), "Has Parent/Guardian" (2), "is" (operator), "Not Set" (4), "is" (operator), "MARYLAND" (5), "is" (operator), "CAROLINE", "is" (operator), and "<--ALL CENTERS-->". At the bottom right, there is a "Maximum Number of Results:" field set to "10..." (6). At the bottom left, there is a "Search" button (7), "Clear", "Reset", "Save Search As:" field, "Include View" checkbox, and "Save" button.

After building this ad-hoc report from the Search Screen as indicated, County Offices can easily:

- save the search criteria to quickly re-run the report later (11-CM, paragraph 37)
- export the search results into an Excel report (11-CM, paragraph 38).

Repeat the steps in this subparagraph to generate a report for each of the RepCaps listed in subparagraph 1 A.

B Review Customer Records With RepCap Entries

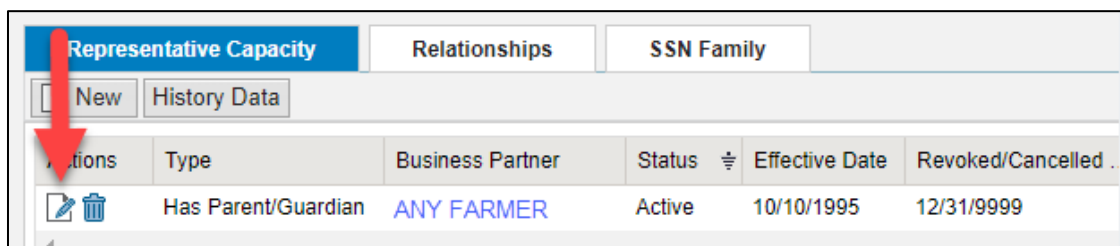
The customer records that are returned in the search results will include RepCaps with all statuses (Active, In Creation, Pending, Revoked, Deleted). It will be necessary to open each customer record to review the details of the RepCap, and the current status.


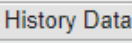
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3 Reviewing RepCap Data in Business Partner Customer Records (Continued)

B Review Customer Records With RepCap Entries (Continued)

On the customer record, review the information on the “Representative Capacity” tab. To review additional details or edit the RepCap, click the “Edit” button (the paper and pen icon).



Representative Capacity		Relationships	SSN Family		
Actions	Type	Business Partner	Status	Effective Date	Revoked/Cancelled
 	Has Parent/Guardian	ANY FARMER	Active	10/10/1995	12/31/9999

If necessary, pull the filed documentation for the customer to compare and review the validity periods for the authority. Ensure that the authority is still active and recorded correctly in RepCap. If modifications or revocations are necessary, follow procedure in 11-CM, Part 3, Section 3 to complete the edits.

C Supplemental Representative Capacity Report From Enterprise Data Warehouse (EDW)

For most RepCap types, the Representative Capacity report in EDW can be used as an alternative/supplement to the report generated in subparagraph A. The customer records will still need to be reviewed and potentially amended in Business Partner according to instruction in subparagraph B.

Note: The exported RepCap report from EDW will enable sorting or filtering by ‘Active’ RepCap status, to prioritize the reviews for those records.

Follow instruction in 12-CM, paragraph 68 to generate the EDW Representative Capacity report, and 12-CM, paragraph 24 to export the report.

Important: Revoked spousal authority RepCaps are not available in EDW, so the report for this RepCap type must be generated according to instruction in subparagraph A.

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4 Action

A FSA County Office Action

County Office staff shall:

- complete the action in paragraph 3 for each of the 7 types of RepCaps listed in subparagraph 1 A by **August 31, 2021**
- contact BP/SCIMS State Security Officer (SSO) with any questions pertaining to this notice and notify SSO upon completion of review.

Note: The SharePoint location of the BP SSO's directory has changed, and 11-CM, Exhibit 7 is being updated with the revised URL
<https://usdagcc.sharepoint.com/sites/fsa-dafp-disaster/BP/Lists/State%20SCIMS%20Business%20Partner%20Security%20Officers/AllItems.aspx>

B FSA State Office Action

All State Office staff shall:

- ensure that all County Offices review and comply with this notice
- contact BP/SCIMS SSO with any questions pertaining to this notice.

C FSA Business Partner SSO Action

All BP SSO's shall:

- ensure that all County Offices review and comply with this notice
- contact the following National Office contacts with questions or concerns

Contact	Email	Subject
Kerry Sefton	kerry.sefton@usda.gov	Business Partner automation
Julie Nanette Pena	julie.pena@usda.gov	RAP & Farmers.gov automation
Joe Lewis	joe.lewis@usda.gov	Signature Authority/RepCap policy
Paul Hanson	paul.hanson@usda.gov	Customer data collection policy

- provide confirmation of completion to the National Office contacts by **September 3, 2021**.