

**U.S. Department of Agriculture Executive Order 13520, "Reducing Improper Payments"
High-Dollar Overpayments Report**

2nd Quarter FY 2015

Name of Program Responsible for Overpayment	Recipient (Entity or Individual)	Total Dollar Amount of the Payments Identified (Sum of Intended Amount and Overpayment Amount)	Intended Dollar Amount That Should Have Been Paid	Overpayment Dollar Amount	Reason For Overpayments	Actions Taken or Planned to Recover the Overpayments	Overall Actions and Strategies Taken or Planned to Prevent Overpayments in the Future
Farm Service Agency (FSA) Direct and Counter-Cyclical Payments (DCP)	Individual	\$27,988	\$0	\$27,988	Non Compliance / Violation - Sodbuster and Swamp-buster Provisions.	Receivable has been established and demand letters sent to the producer.	FSA county office staff will ensure producers are fully aware upon signing program forms/applications of the terms and conditions associated with the applicable program. The county office staff will emphasize to the producers that they agree and accept full

							responsibility for it as relates to adhering to the program policies, procedures, and terms and conditions as provided when they signed the applicable program forms and applications.
FSA DCP	Entity	\$195,493	\$0	\$195,493	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer.	End-of-year reviews for payment eligibility/limitation compliance purposes (the actively engaged part of eligibility) are completed after the fact because the producer is required to provide a complete set of final business

							documents that illustrate how the farming operation was conducted for the year under review. The county office will continue to enforce and inform producers of the program eligibility requirements applicable for actively engaged to mitigate risks associated with producers becoming non-compliant.
FSA DCP	Entity	\$104,742	\$0	\$104,742	Non Compliance / Violation - Payment Limitation Review.	Overpayment recovered on 2/4/2015. No further action required.	End-of-year reviews for payment eligibility/limitation compliance purposes (the actively engaged part of

							eligibility) are completed after the fact because the producer is required to provide a complete set of final business documents that illustrate how the farming operation was conducted for the year under review. The county office will continue to enforce and inform producers of the program eligibility requirements applicable for actively engaged to mitigate risks associated with producers becoming non-compliant.
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FSA DCP	Individual	\$39,760	\$0	\$39,760	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to the Office of the Inspector General (OIG) for Criminal Investigation for Conspiracy to Commit Fraud.	7 Code of Federal Regulation (CFR) 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments
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						<p>received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by the Commodity Credit Corporation (CCC).</p> <p>A participant will refund to CCC all program payments, in accordance with § 1416.11, received by</p>
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							such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA DCP	Entity	\$119,471	\$0	\$119,471	A Service Center Information Management System merge for 2014 created unintended prior year overpayments.	Offset of future payments will be taken.	The county office or State office will review all merge cases with more scrutiny.

FSA DCP	Individual	\$67,702	\$0	\$67,702	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in
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						<p>accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in accordance with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant</p>
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							is determined to have knowingly misrepresented any fact affecting a program determination.
FSA DCP	Individual	\$46,213	\$0	\$46,213	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be

						<p>entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in accordance</p>
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							with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA DCP	Individual	\$25,610	\$0	\$25,610	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part,

						Conspiracy to Commit Fraud.	or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date
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							of the original disbursement by CCC. A participant will refund to CCC all program payments, in accordance with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA DCP	Individual	\$92,012	\$0	\$92,012	Non Compliance / Violation - Adjusted Gross Income	Receivable has been established and demand letters sent	Continue to inform the producers of the importance of completing AGI

					(AGI).	to the producer.	<p>certifications correctly. Customers are continually advised of program AGI requirements. COF will review AGI requirements with customers and ensure document is loaded correctly. AGI policies and procedures were recently presented during the National Agricultural Risk Coverage/Price Loss Coverage and Noninsured Assistance Program training sessions. This should mitigate errors and reduce errors associated with</p>
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							AGI.
FSA DCP	Individual	\$54,010	\$0	\$54,010	<p>Producer chose to change his farm operating plan in a prior year from an individual with one limitation to a husband/wife joint venture getting two limitations resulting in a late succession-in-interest to the DCP contract.</p>	<p>Overpayment was reported in the 1st quarter of 2015. Producer filed an appeal but was denied relief. Overpayment has been recovered. No further action required.</p>	<p>FSA county office staff will ensure producers are fully aware upon signing program forms/applications of the terms and conditions associated with the applicable program. The county office staff will emphasize to the producers that they agree and accept full responsibility for it as relates to adhering to the program policies, procedures, and terms and conditions that</p>

							were provided when they signed the applicable program forms and applications.
FSA DCP	Individual	\$27,269	\$0	\$27,269	Producer chose to change his farm operating plan in a prior year from an individual with one limitation to a husband/wife joint venture getting two limitations resulting in a late succession-in-interest	Overpayment was reported in the 1st quarter of 2015. Producer filed an appeal, but was denied relief. Overpayment has been recovered. No further action required.	FSA county office staff will ensure producers are fully aware upon signing program forms/applications of the terms and conditions associated with the applicable program. The county office staff will emphasize to the producers that they agree and accept full responsibility

					to the DCP contract.		for it as relates to adhering to the program policies, procedures, and terms and conditions that were provided when they signed the applicable program forms and applications.
FSA DCP	Individual	\$33,419	\$0	\$33,419	Producer chose to change his farm operating plan in a prior year from an individual with one limitation to a husband/wife joint venture getting two limitations, resulting in	Overpayment was reported in the 1st quarter of 2015. Producer filed an appeal, but was denied relief. Overpayment has been recovered. No further action	FSA County Office staff will ensure producers are fully aware upon signing program forms/applications of the terms and conditions associated with the applicable program. The county office staff will emphasize to the producers

					a late succession-in-interest to the DCP contract.	required.	that they agree and accept full responsibility for as it relates to adhering to the program policies, procedures, and terms and conditions that were provided when they signed the applicable program forms and applications.
FSA Miscellaneous Disaster Programs (MDP)	Individual	\$127,939	\$64,367	\$63,572	County office employee entered incorrect data from the Emergency Assistance for Livestock, Honeybees and Farm-Raised Fish Program	Offset of future payments will be taken.	The county office employees will conduct 2nd party reviews to ensure program and eligibility data is accurately entered and reflected on program records and forms prior to issuing program

					(ELAP) gross payments report into the ELAP payment application.		payments.
FSA MDP	Individual	\$26,335	\$0	\$26,335	Lease provided was found to have a forged signature.	Receivable has been estab- lished and demand letters sent to the producer. This case has been referred to OIG for investiga- tion.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will

						<p>not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in accordance with § 1416.11,</p>
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							received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA MDP	Individual	\$28,600	\$0	\$28,600	Non Compliance / Violation - Adjusted Gross Income (AGI).	Overpayment recovered on 2/2/2015. No further action required.	The end-of-year review was completed according to the existing policies. For 2014 and forward, AGI compliance will be checked before program payments are issued, which will prevent and/or mitigate overpayments

							in the future.
FSA MDP	Individual	\$38,684	\$0	\$38,684	Producer certified to AGI noncompliance-software did not read eligibility and county failed to catch in review.	Receivable has been established and demand letters sent to the producer.	The county office employees will conduct 2nd party reviews to ensure program and eligibility data is accurately entered and reflected on program records and forms prior to issuing program payments.
FSA MDP	Individual	\$27,300	\$0	\$27,300	Multi-County producer inadvertently paid twice.	Receivable has been established and demand letters sent to the producer.	The county office employees will conduct 2nd party reviews to ensure program and eligibility data is accurately entered and reflected on program records and forms prior to

							issuing program payments.
FSA MDP	Individual	\$36,243	\$0	\$36,243	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments

						<p>received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in accordance with § 1416.11, received by such participant with respect to all contracts or</p>
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							applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA MDP	Individual	\$63,757	\$0	\$63,757	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits

						<p>for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant</p>
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							will refund to CCC all program payments, in accordance with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA MDP	Individual	\$96,037	\$0	\$96,037	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a

						referred to OIG for Criminal Investiga- tion for Conspiracy to Commit Fraud.	program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at
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FSA MDP	Individual	\$34,299	\$0	\$34,299	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in
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							the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA MDP	Individual	\$45,827	\$0	\$45,827	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not

						<p>otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in</p>
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							accordance with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA MDP	Individual	\$52,173	\$0	\$52,173	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in

						<p>Investigation for Conspiracy to Commit Fraud.</p>	<p>accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years.</p>
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FSA Noninsured Assistance Program (NAP)	Individual	\$87,009	\$0	\$87,009	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in
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							is determined to have knowingly misrepresented any fact affecting a program determination.
FSA NAP	Individual	\$82,127	\$0	\$82,127	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be

						<p>entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in accordance</p>
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							with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA NAP	Individual	\$145,785	\$0	\$145,785	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investiga-	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance

						<p>tion for Conspiracy to Commit Fraud.</p>	<p>with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run</p>
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							<p>from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in accordance with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.</p>
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FSA NAP	Individual	\$57,722	\$0	\$57,722	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments and must refund all such payments received, plus interest as determined in
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						<p>accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in accordance with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if</p>
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							the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA NAP	Individual	\$100,234	\$0	\$100,234	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal Investigation for Conspiracy to Commit Fraud.	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not

						<p>otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years. Interest will run from the date of the original disbursement by CCC.</p> <p>A participant will refund to CCC all program payments, in</p>
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							accordance with § 1416.11, received by such participant with respect to all contracts or applications, as may be applicable, if the participant is determined to have knowingly misrepresented any fact affecting a program determination.
FSA NAP	Individual	\$53,911	\$0	\$53,911	Non Compliance / Violation - Actively Engaged Rules.	Receivable has been established and demand letters sent to the producer. This case will be referred to OIG for Criminal	7 CFR 1416.7 requires a determination to be made as to whether the participant deliberately misrepresented any fact affecting a program determination made in

						<p>Investigation for Conspiracy to Commit Fraud.</p>	<p>accordance with this part, or any other part that is applicable to this part, to receive benefits for which the participant would not otherwise be entitled, will not be entitled to program payments, and must refund all such payments received, plus interest as determined in accordance with part 1403 of this chapter. The participant will also be denied program benefits for the immediately subsequent period of at least 2 crop years and up to 5 crop years.</p>
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<p>Natural Resources Conservation Service (NRCS) Farm Bill Financial Assistance (FBFA)</p>	<p>Entity</p>	<p>\$120,000</p>	<p>\$0</p>	<p>\$120,000</p>	<p>The participant was not eligible for the program because AGI requirements were not met.</p>	<p>Demand letter has been sent to the payee.</p>	<p>Participants self-certify adjusted gross income on forms completed and submitted by the participant to FSA. Based on this information, FSA determines income eligibility and provides the eligibility determination to NRCS through agency business tools. FSA is currently working with the Internal Revenue Service (IRS) to validate 2009-2013 income self-certifications. FSA has informed NRCS of participants that have been</p>
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						deemed AGI Non-Compliant. NRCS has issued demand letters to collect improper payments that have been made to AGI non-compliant participants. Additionally, NRCS has made changes to the Protracts software to prevent improper payments being made to participants who are retroactively determined to be AGI ineligible. NRCS has issued guidance to States via a series of national bulletins and
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							video tele-conferences on to how address AGI eligibility issues.
NRCS FBFA	Individual	\$46,107	\$0	\$46,107	The producer did not inform NRCS that he changed from individual to corporation within 60 days.	Demand letter has been sent to the payee.	The Conservation Stewardship Program Coordinator provided contract management training to all field office employees across the State in FY 2014 and started followup training across the State in FY 2015. Iowa has also implemented staffing changes by adding Farm Bill Specialists to process payments. Farm Bill

							Specialists have been providing training specific to identify potential improper payments and make any needed corrections prior to processing payments.
NRCS FBFA	Individual	\$93,231	\$0	\$93,231	The participant was not eligible for the program because AGI requirements were not met.	Demand letter has been sent to the payee.	Participants self-certify adjusted gross income on forms completed and submitted by the participant to FSA. Based on this information, FSA determines income eligibility and provides the eligibility determination to NRCS through agency

						<p>business tools. FSA is currently working with the IRS to validate 2009-2013 income self-certifications. FSA has informed NRCS of participants that have been deemed AGI Non-Compliant. NRCS has issued demand letters to collect improper payments that have been made to AGI non-compliant participants. Additionally, NRCS has made changes to the Protracts software to prevent improper payments being made to</p>
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							participants who are retroactively determined to be AGI ineligible. NRCS has issued guidance to States via a series of national bulletins and video tele-conferences on to how address AGI eligibility issues.
NRCS FBFA	Individual	\$35,928	\$0	\$35,928	The participant was not eligible for the program because AGI requirements were not met.	Demand letter has been sent to the payee.	Participants self-certify adjusted gross income on forms completed and submitted by the participant to FSA. Based on this information, FSA determines income eligibility and provides the

							<p>eligibility determination to NRCS through agency business tools. FSA is currently working with the IRS to validate 2009-2013 income self-certifications. FSA has informed NRCS of participants who have been deemed AGI Non-Compliant. NRCS has issued demand letters to collect improper payments that have been made to AGI non-compliant participants. Additionally, NRCS has made changes to the Protracts software to prevent</p>
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							improper payments being made to participants who are retroactively determined to be AGI ineligible. NRCS has issued guidance to States via a series of national bulletins and video tele-conferences on to how address AGI eligibility issues.
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NRCS FBFA	Individual	\$86,204	\$0	\$86,204	The participant was not eligible for the program because AGI requirements were not met.	Demand letter has been sent to the payee.	Participants self-certify adjusted gross income on forms completed and submitted by the participant to FSA. Based on this information, FSA determines income eligibility and provides the eligibility determination to NRCS through agency business tools. FSA is currently working with the IRS to validate 2009-2013 income self-certifications. FSA has informed NRCS of participants who have been deemed AGI Non-Compliant.
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							<p>NRCS has issued demand letters to collect improper payments that have been made to AGI non-compliant participants. Additionally, NRCS has made changes to the Protracts software to prevent improper payments being made to participants who are retroactively determined to be AGI ineligible. NRCS has issued guidance to States via a series of national bulletins and video tele-conferences on to how address</p>
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							AGI eligibility issues.
NRCS FBFA	Individual	\$155,271	\$0	\$155,271	Duplicate payment by NRCS staff.	Funds have been recovered.	In order to avoid duplicate payments in the Invoice Payment Platform (IPP) in the future, the county office plans to review the payment history in IPP for the subject contract that is being invoiced to ensure that the invoiced amount has not

							already been submitted and approved. In addition, contact will be made with the vendor to determine if they intend to enter their invoices in IPP or if they will be submitting a hard copy for NRCS to enter in to IPP to ensure that duplicate invoices are not submitted to IPP.
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