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Market Gains and LDP's

Process for Importing Data for Transactions Processed through CMA's, LSA's, and DMA'S

United States Department of Agriculture - Farm Service Agency

Table of Contents

In	trodı	action			
1	Hig	High-Level Concept2			
2	Customer Verification				
	A	Purpose	3		
	В	Data Required from CMA/LSA/DMA	4		
	C	Process for Submitting Customer Data for Verification			
	D	Results Transmitted Back to CMA/LSA/DMA			
	E	Rejected Records			
3	Import Process				
	Α	Introduction	6		
	В	Transmission File and Format			
	C	Modifying Records Previously Submitted	7		
	D	Transmission File Frequency	7		
4	Rep	oorts	8		
	۸ .	Turkun dunakinan	O		
	A	Introduction			
	В	Customer Verification			
	C	Attribution Report			
	D	Reduction Report	10		

Introduction

The MG/LDP attribution process is a web-based system that records attribution amounts to a payment entity and members, if applicable, that result from market gains on loan repayments and loan deficiency payments (LDP's).

This process is an interim solution to address the 2014 Farm Bill mandate which reinstates a payment limitation for market gains and LDP's. Under the provisions of the 2014 Farm Bill, the payment limitation for market gains and LDP's is also now shared with payments earned through the Agricultural Risk Coverage (ARC) and Price Loss Coverage (PLC) programs. By creating a method to record the attribution amounts:

- reports can be provided as needed to monitor pay limit status, and
- data exists to determine the available payment limitation if ARC/PLC payments are triggered.

Software was released on October 17, 2014, which gave FSA County Office users the ability to record market gain and LDP transaction data. However, the Industry expressed a desire to provide data electronically so it could be imported into the system rather than sending data to FSA County Offices to be data loaded.

As such, an import process has been developed to accommodate this request. The remainder of this document outlines this process and the requirements for CMA's, LSA's, and DMA's to use the import process.

1 High-Level Concept

Following release of the data entry process used by FSA County Office, the Industry requested that FSA provide additional functionality that includes the following:

- 1) Provide a process where a file could be submitted by the CMA/LSA/DMA that includes market gain or LDP information and would be used in lieu of the data load process used by FSA County Offices.
- 2) Provide a report CMA/LSA/DMA's that includes their customers with the total amount attributed to each of their producers (members).

Example: Producer A has amounts attributed as follows. The amount sent back to the applicable CMA/LSA/DMA for this producer is \$100,000. CMA 1, CMA 2, and LSA 1 would each receive a report for this producer.

- CMA 1 \$50,000
- CMA 2 \$25,000
- LSA 1- \$5,000
- County Office 1 \$20,000.

The process that has been developed for this effort is broken down into 3 phases. The remainder of this document describes each of these phases in more detail.

- Customer Verification
- Data Import
- Reporting.

2 Customer Verification

A Purpose

The Alternative Delivery Partner Process (ADPP) is a process that has been used for several years which enables CMA/LSA/DMA's to submit customer data electronically to determine eligibility information for their customers.

However, this process does not include a customer verification component. As such, and because the tax ID type is not a required entity, the possibility exists that a 9-digit tax ID number submitted through ADPP could result in numerous results on FSA files.

Example: Tax ID number 123456789 could result in multiple customers on FSA's system, one with a social security number and one with an employer ID number.

A fix was made earlier this year to reject the return of the eligibility data if multiple customers were found with the same tax ID number, however this fix does not fully address the customer verification requirement because a match is also not being made on name.

In the vast majority of cases, the customer name will match to the tax ID number. However, the possibility exists that a tax ID number could be recorded incorrectly, either by the CMA/LSA/DMA or by FSA County Office users. Using the tax ID number as the sole variable for identifying a customer creates the possibility that a match is found but not necessarily for the same customer. As such, matching on tax ID and name ensures the correct customer is matched, which is critical for recording market gain and LDP amounts.

Note: FSA is in the process of a tax ID verification process with the Internal Revenue Service to validate tax ID numbers, however this process has just started and not all customer records are validated. This process also has a name component for identifying a customer.

Since data imported for market gains and LDP's will be attributed to customers without user intervention to verify the customer data and will affect the customer's available payment limitation used to determine ARC/PLC payment amounts, FSA determined a customer verification process is necessary. However, the import process was developed with minimal validations in order to expedite the development effort and does not include this functionality.

The purpose of the customer verification process is to ensure that:

- CMA/LSA/DMA customer matches the customer record on FSA files which ensures amounts recorded through the import process are attributed to the correct customer
- customer data is corrected if discrepancies are found.

B Data Required from CMA/LSA/DMA

A separate process has been developed to verify that CMA/LSA/DMA customer matches FSA's customer data before market gain/LDP data is imported into FSA's attribution system. The following information must be submitted by the CMA/LSA/DMA for the customer verification process.

- Tax ID number
- Tax ID type, if available
- Customer Name
 - Individual Last Name, First Name
 - Business Business Name

Note: This is the CMA/LSA/DMA customer name not the customer name provided by FSA back to the CMA/LSA/DMA through the ADP process.

C Process for Submitting Customer Data for Verification

The customer list should be submitted via e-mail to each of the following individuals.

- Tracey Smith at <u>Tracey.Smith@usda.gov</u>
- Mary Porter at <u>Mary.Porter@ga.usda.gov</u>
- Laura Schlote at <u>Laura.Schlote@wdc.usda.gov</u>
- Alison Groenwoldt at <u>Alison.Groenwoldt@wdc.usda.gov</u>.

An Excel spreadsheet is the preferred format, but other formats are acceptable provided the data can be opened in an Excel spreadsheet. Further the file should be encrypted with the following password.

MGLDPImportProcess2015\$

D Results Transmitted Back to CMA/LSA/DMA

FSA will process the customer data submitted by each CMA/LSA/DMA to determine whether the customer data matches FSA records.

For those records that match, an Excel spreadsheet will be provided back to the CMA/LSA/DMA with the information originally submitted to FSA and the following additional data.

- Core Customer ID for the CMA/LSA/DMA (informational only)
- Core Customer ID for the producer
- FSA Common Customer Name
- Recording State and County

This list will be maintained as the master list for the applicable CMA/LSA/DMA and includes the information needed for submitting data through the import process described in paragraph 3.

E Rejected Records

Records where a match cannot be made on the combination of the tax ID number and name will be grouped into the following categories with the specified resolution.

Note: These categories have been identified through test files submitted by several Companies. If additional categories are identified, this list will be updated.

Category	Description		Resolution
Not Found in SCIMS	The 9-digit ID number does not match any record in FSA's Business Partner or SCIMS applications which maintains the basic customer data.	CMA/LSA/DMA a resolution for FSA data.	nt back to the applicable as there is not a definitive A to accurately verify the customer
Not Eligible Under Attribution	These customers have an "other" or "general entity member" business type in FSA's Business Partner application and are not eligible under direct attribution provisions.	Record will be sent back to the applicable CMA/LSA/DMA. These customers should already be rejecting through ADPP currently and returned as ineligible.	
Not Linked to FSA County Office	This customer is not associated with any FSA County Office. In order to attribute market gains and LDP's, the customer must be linked to at least one FSA County Office.	Record will be ser CMA/LSA/DMA. These customers s	nt back to the applicable should already be rejecting rrently and returned as ineligible.
Both S & E Found	The tax ID type was not submitted and there is more than one record on FSA's system with the 9-digit ID number submitted by the	FSA staff in the N research to compa	ational Office will manually are the customers names for the 0-digit ID number. THEN
	CMA/LSA/DMA.	can be verified manually	the record will be processed with the tax ID type and added to the list of verified customers.
Match on Tax ID but Not on Name	After a variety of filters are applied, this list includes the customers where the name provided by the CMA/LSA/DMA cannot be matched to FSA records. In most cases, the name formatting is just different enough that it could not be matched with the other criteria. These customers should primarily involve the following situations. • First name matches, but last name does not implying name change due to marital status • Customer is doing business with one organization as an individual but the other as a revocable trust using their social security number.	number provided by the CMA/LSA/DMA. FSA County Offices will be instructed to work with the producer to determine the correct customer data, then communicate that information to the CMA/LSA/DMA's. After the applicable records are reconciled, the CMA/LSA/DMA should resubmit the customer data for verification according to subparagraph 2B in this document.	
	Name simply does not match FSA records.		

3 Import Process

A Introduction

Once customer data has been verified, CMA/LSA/DMA's can submit market gain and LDP transaction data to FSA to be imported into the system in order to verify eligibility and attribute amounts for payment limitation purposes.

The import process is built on the concept already utilized for ADPP.

- The CMA/LSA/DMA submits a file through secure FTP client software.
- FSA processes the file in a nightly batch process.

B Transmission File and Format

Transmission files submitted to FSA to be imported into FSA's attribution system should be submitted in a manner similar to the current ADP process with the following exceptions.

File name - MGLDPPayments-xxxxxx-mmddyyyy

- "xxxxxx" represents the state and county code for the applicable CMA/LSA/DMA separate by a hyphen, such as "01-001".
- "mmddyyyy" represents the file transmission date.

Example: MGLDPPayments-01-001-02182015

Note: Only one file should be submitted per day by 7:00 p.m. eastern time for the nightly batch process. See subparagraph 3D for transmission frequency.

The table below provides a description of each field that should be included in a market gain/LDP transaction record. Each field in the record should be enclosed with quotation marks and separated by a comma. The following are examples of a new and modified record.

- $\bullet \quad \text{"N","LU","48-803","123456","JOHN\ DOE","049","19","60000","6100","1500.00","2015-02-01\ 01:01:01","2014"}$
- $\bullet \qquad \text{"M","LU","48-803","123457","SAM SMITH","305","48","60001","6100","1500.00","2015-02-01\ 01:01:01","2014"}$

Data Field	Description
Record type	N for New – this represents a record being submitted for the first time for the applicable producer.
	M for Modify – represents a record that corrects a previously submitted record. This code should also be used for records that should be deleted.
Transaction Type	LU for Market Gain
	PL for LDP
Organization State and County Code	State and county code assigned to the applicable CMA/LSA/DMA.
Producer CCID	CCID for the verified producer included in the customer verification file returned by
	FSA described in subparagraph 2D.
Producer	Common Customer Name for the verified producer included in the customer
Common Name	verification file returned by FSA described in subparagraph 2D.

Data Field	Description
Producer County	Recording County for the verified producer included in the customer verification file
Code	returned by FSA described in subparagraph 2D.
Producer State	Recording State for the verified producer included in the customer verification file
Code	returned by FSA described in subparagraph 2D.
Loan/LDP	From CMA/LSA/DMA records.
Number	
Commodity Code	Currently upland cotton is the only commodity eligible for market gains and LDP's. The
	commodity code for upland cotton is "6100".
Amount	Dollar amount with 2 decimal places from the CMA/LSA/DMA records.
	Example: \$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$\$
	If a record is submitted that is subsequently determined to be in error and should
	be deleted, set the dollar amount to "\$0.00".
Transaction Date	Transaction date for the market gain or LDP from the CMA/LSA/DMA records.
	Time of the transaction is optional.
	Format example: YYYY-MM-DD HH:MM:SS
Program Year	Current market gain and LDP activity is for 2014 only.

C Modifying Records Previously Submitted

If a correction is needed to a previously submitted record, a record should be transmitted with an "M" record type. In addition, the data in each field should match exactly to the data in the original record submitted with the exception of the record type and dollar amount.

This table provides some examples of how data may be submitted to correct previously submitted records.

Example 1:	: Record was submitted with a market gain of \$100.00 but the amount is later		
	determined to be \$150.00		
Original	"N", "LU", "48-803", "123456", "JOHN DOE", "049", "19", "60000", "6100", "100.00", "2015-02-01		
	01:01:01", "2014"		
Revised	"M", "LU", "48-803", "123456", "JOHN DOE", "049", "19", "60000", "6100", "150.00", "2015-02-01		
	01:01:01", "2014"		
Example 2	Example 2: Record was submitted with a LDP that is later determined to have been submitted for		
	the wrong customer. A deletion record must be submitted for the original record and		
a new record should be submitted for the correct customer.			
Original	"N","PL","48-803","123456","JOHN DOE","049","19","60000","6100","100.00","2015-02-01		
	01:01:01","2014"		
Revised	"M","PL","48-803","123456","JOHN DOE","049","19","60000","6100","0.00","2015-02-01		
	01:01:01","2014"		
Original	"N","PL","48-803","123457","SAM SMITH","049","19","60000","6100","100.00","2015-02-01		
	01:01:01","2014"		

D Transmission File Frequency

Market gain and LDP information can be submitted daily, however all transactions should be included in one file. Only one transmission file should be submitted each day.

4 Reports

A Introduction

Until a long-term solution can be developed that accommodates the needs of all stakeholders, a report was requested that specifies the attribution amount for each CMA/LSA/DMA customer.

For more efficient program administration, FSA has identified and developed two reports that will be transmitted back to all CMA/LSA/DMA's with verified customer data as addressed in paragraph 2.

- Attribution Report
- Reduction Report

These reports will be transmitted back to CMA/LSA/DMA's after the nightly batch process is completed as addressed in paragraph 3. The remainder of this paragraph provides additional information on each report.

B Customer Verification

As specified in paragraph 2, each customer associated with a CMA/LSA/DMA must be verified with the customer on FSA's system. Once verified, a master list will be created for FSA purposes that identifies each customer associated with the applicable CMA/LSA/DMA.

Important:

CMA's and DMA's that do not currently have market gain or LDP activity can receive the Attribution Report file in order to track the payment limitation attribution amounts for their customers. While those CMA/DMA's would not be using the import process, the CMA/DMA is still required to submit their customer data for verification according to paragraph 2 in order to begin receiving the report.

C Attribution Report

Data in this transmission file includes the CMA/LSA/DMA customer with the amount currently attributed to that customer for payment limitation purposes.

The purpose of this file is to provide the CMA/LSA/DMA with the accumulated attribution amount for each of their customers across all organizations. The total amount is then sent back to the CMA/DMA/LSA that does business with the customer.

Example: Producer A has amounts attributed as follows.

- CMA 1 \$50,000
- CMA 2 \$25,000
- LSA 1- \$5,000
- County Office 1 \$20,000.

The amount sent back to the applicable CMA/LSA/DMA for this producer is \$100,000. CMA1, CMA2, and LSA1 will all receive this report after Producer A has been verified for each company according to paragraph 2.

Disclaimer: The Attribution Report includes information only at the "payment entity" level. If the customer is a corporation, limited partnership, limited liability company or other similar entity with members, amounts are attributed to the stockholders or owners of these entities through the attribution process; however this report only includes the amount for the CMA/LSA/DMA customer (corporation).

All CMA/LSA/DMA's should understand that the entity may have an unused available payment limitation, but if a stockholder has reached payment limitation or does not meet certain eligibility requirements, such as AGI, the entity may not be eligible to receive \$125,000 for payment limitation purposes.

As indicated in subparagraph 4B, the master customer verification list developed for each CMA/LSA/DMA is used to generate the Attribution report. Each report transmitted back to the applicable CMA/LSA/DMA includes information for all verified customers even if there are no amounts attributed to the customer.

Example: Customers 1, 2, and 3 are verified for CMA1. When the nightly attribution report file is processed, the attribution amount for all 3 customers will be retrieved and included in the transmission file sent back to CMA1. All 3 customers have \$0 amounts currently attributed.

The next business day, a market gain is transmitted for Customer 1 from CMA1. After the nightly batch process is completed, a new attribution report file is generated for CMA1 that includes records for all 3 customers, not just Customer 1.

The new attribution report file received the next day effectively overrides the file received previously but it includes the current accumulated attribution amounts for all verified customers across all organizations. Customer 1 has

the amount that was received in the import file on day 2 and Customers 2 and 3 still have \$0 amounts attributed.

Attribution report files will be posted to the applicable CMA/LSA/DMA directory in a manner similar to the current ADP process as follows.

File name for all commodities except peanuts-

MGLDP_XXX_Attribution_Rpt_9999999

File name for peanuts- MGLDP_PN_XXX_Attribution_Rpt_9999999

- "XXX" represents the CMA/LSA/DMA code
- "999999" represents the core customer ID for the CMA/LSA/DMA, which is returned as part of the customer verification process. See subparagraph 2D.

Example: MGLDP_AAA_Attribution_Rpt_1234567

Note: Generally the file should be posted at 3:00 a.m. central time each night after the nightly batch process is completed.

The table below provides a description of each field included in the Attribution report file. The fields are separated by a comma. The following is an example of an Attribution report file record.

• 195344,John Doe,100.00

Data Field	Description
Producer CCID	CCID for the verified producer.
Producer	Common Customer Name for the verified producer.
Common Name	
Attribution	Total attribution dollar amount with 2 decimal places for the applicable producer
Amount	CCID. The amount reflects all transactions recorded through all organizations.

D Reduction Report

Similar to the data included in the Attribution report, the Reduction report includes information for the CMA/LSA/DMA customer where transmitted market gain or LDP amounts could not been attributed.

Example: CMA1 transmits a market gain record for Customer 1 in the amount of \$100,000. When the record is processed, FSA's system determines this customer only has an available payment limitation of \$80,000. The following is transmitted back to CMA1:

- Attribution Report \$125,000 (\$35,000 previously attributed plus \$80,000 for the new transaction)
- Reduction Report Producer or member has reached the maximum payment under payment limitation provisions (for the \$20,000 in the current transaction that could not be attributed).

The CMA/LSA/DMA can use this information to make future marketing decisions and/or work with the local FSA County Office if a discrepancy exists that should be rectified for an eligible producer.

Unlike the Attribution report, the Reduction report only includes those customers with an ineligibility condition; however any customer for the applicable CMA/LSA/DMA with a reduction will be included. If the condition is rectified, the Reduction record automatically reprocesses during the nightly batch process and amounts will be attributed if possible. The reports will be updated according to the latest batch results.

Note: FSA County Offices have access to the Nonpayment Report through the Common Payment Reports System that also provides reasons amounts cannot be attributed to a customer.

Reduction report files will be posted to the applicable CMA/LSA/DMA directory in a manner similar to the current ADP process as follows.

File name for all commodities except peanuts-

MGLDP_XXX_Reductions_Rpt_9999999

File name for peanuts- MGLDP_PN_XXX_Reductions_Rpt_9999999

- "XXX" represents the CMA/LSA/DMA code
- "999999" represents the core customer ID for the CMA/LSA/DMA, which is returned as part of the customer verification process. See subparagraph 2D.

Example: MGLDP_AAA_Reductions_Rpt_1234567

Note: Generally the file should be posted at 3:00 a.m. central time each night after the nightly batch process is completed.

The table below provides a description of each field included in the Attribution report file. The fields are separated by a comma. The following is an example of an Attribution report file record.

• 1234567,195344,John Doe,Actively Engaged

Data Field	Description
CMA/LSA/DMA	CCID for the applicable CMA/LSA/DMA returned through the customer
CCID	verification process. See subparagraph 2D for additional information.
Producer CCID	CCID for the verified producer.
Producer	Common Customer Name for the verified producer.
Common Name	•
Attribution	Ineligibility reason that caused the reduction. Questions regarding producer
Amount	eligibility should be directed to the applicable FSA County Offices.