

Part 300 – Instruction and Guidance for State Implementation of Easement Internal Controls Prior to Obligation, Payment, and Closing

300.0 Purpose

This national instruction provides updated guidance for the implementation of the easement internal controls (IC) process, including roles and responsibilities, review requirements, national-level review threshold criteria, document lists, review timing and planning guidance, business tool and system requirements, and additional quality assurance and review processes. An enhanced multi-level easement IC process has been implemented since January 5, 2015.

300.1 Scope

- A. Title 250, General Manual, Part 411, Subpart A, identifies the statutory and regulatory requirements NRCS must meet to ensure adequate internal controls are in place to prepare accurate and reliable financial statements and reports for all revenues and expenditures.
- B. State Conservationists, with support from State easement or Easement Acquisition Branch (EAB) staff, are responsible to ensure that internal controls are implemented pursuant to applicable statutes, regulations, and policy.
- C. This national instruction (NI) is to be used in conjunction with applicable program manuals, national instructions, and national bulletins. Easement internal control requirements found in this NI pertain to the following NRCS programs: Agricultural Conservation Easement Program (ACEP), Emergency Watershed Protection Program – Floodplain Easements (EWPP- FPE), Healthy Forests Reserve Program (HFRP), and easements enrolled through a Regional Conservation Partnership Program (RCPP) Agreement.
- D. For cooperative and grant agreements entered into under the Agricultural Land Easement (ALE) component of ACEP, NRCS staff must work with the Farm Production and Conservation (FPAC) Business Center (BC) Grants and Agreements Division (GAD) and must also adhere to NI 300-302, “Streamlining the ACEP-ALE Cooperative and Grant Agreements Review and Approval Process for Template Agreements.”
- E. This NI only applies to enrollment, fund obligation, and payment for an easement and 30-year contract under the above-listed programs. This NI does not apply to easement restoration cost-share agreements (RCSAs) or other easement-related fund obligations and payments such as easement boundary surveys, closing agent services, or environmental database records search contracts.

300.2 Roles and Responsibilities

A. NRCS

NRCS has overall leadership for administering and implementing ACEP, EWPP-FPE, HFRP, and RCPP, including the responsibilities to ensure statutory and regulatory requirements are met, program implementation is conducted subject to adequate internal controls, and policies and guidelines are established and followed.

B. National Headquarters (NHQ) – Regional Conservationist (RC)

RCs are responsible for those activities as designated by the Chief or the Deputy Chief for Programs, including, but not limited to, the following:

- (1) Provide leadership to the States regarding correct implementation of easement internal controls policy.
- (2) Provide oversight of State performance of adhering to policy based upon national easement IC metrics.
- (3) Review and recommend expedited national prepayment IC reviews.

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C. NHQ – Deputy Chief for Programs

The Deputy Chief for Programs oversees and directs the implementation of the easement IC process and associated policies and may delegate certain implementation and decision-making responsibilities to the Easement Program Division Director, Easement Policy Branch Chief, and staff.

D. NHQ – Easement Program Division (EPD)

Within NHQ, EPD responsibilities include, but are not limited to, the following:

- (1) Develop and maintain policies, guidelines, and procedures to meet statutory and regulatory internal control requirements.
- (2) Staff and maintain a national easement Internal Controls Team to lead the development and implementation of easement IC policies, guidelines, and procedures.
- (3) Receive and review IC packages in accordance with established policy, guidelines, and procedures.
- (4) For States serviced by the EAB within EPD, the EAB performs IC responsibilities outlined for State staff.
- (5) Complete required national-level data entry in the appropriate business tools and system of records.
- (6) Assist customers with implementation of the IC process.
- (7) Provide training on the IC process.
- (8) Monitor, assess, and oversee the implementation and efficacy of the IC process. Including spot checks, random, and periodic reviews of compliance with this policy.
- (9) Coordinate across EPD staff to ensure policies are consistent, applicable, and enforced.
- (10) Coordinate across other NHQ Divisions and with FPAC-BC to ensure efficient implementation of the IC process.
- (11) Report IC metrics and non-compliance with policy to Deputy Chief for Programs and Regional Conservationist as appropriate. Propose and document any needed corrective actions to address non-compliance.

E. State Offices – State Conservationist and Area Directors

Each State Conservationist and Area Director is responsible to:

- (1) Provide State leadership and ensure the easement IC process is implemented at the State level in accordance with established policies, guidelines, and procedures. The State Conservationist/Area Director may delegate certain IC process responsibilities and functions to NRCS staff within the State and other appropriately qualified third parties. Third-party staff shall not be delegated final decision-making authority, and all work related to the easement IC process must be reviewed and certified by a NRCS employee.
- (2) Ensure that no fund obligation, payment, or closing occurs for an easement or 30-year contract prior to the completion of the IC process as identified in policy.
- (3) Ensure that the State Quality Assurance Plan contains requirements that guarantee the efficient and correct implementation of the easement IC process.
- (4) Review, make determinations, and submit as needed, any requests for expedited national prepayment IC reviews.

F. State Offices and Easement Implementation Teams

Responsibilities delegated to NRCS State Office and Easement Implementation Team staff by the State Conservationist may include, but are not limited to, the following:

- (1) Implement established easement IC policies, guidelines, and procedures.
- (2) Complete State-level portions of the IC process and submit IC packages in accordance with established policies.
- (3) Coordinate with the National IC Team for IC reviews.
- (4) Coordinate with the State Conservationist to ensure correct implementation of easement IC.

G. All NRCS Employees

NRCS employees are prohibited from performing or influencing any part of the easement IC process for easements, 30-year contracts, or agreements on land owned by the employee or members of the employee's immediate family, on land in which they or members of their immediate families have a financial interest, or where there is an appearance of or actual conflict of interest. All employees must comply with the prohibitions against conflicting interest and other ethics provision, which may include the designating another NRCS employee outside of the normal supervisory chain to provide assistance (see Title 110, General Manual, Part 405).

300.3 Easement Internal Controls Review Processes

A. Review Types

- (1) Preobligation IC Review – Prior to obligation of acquisition funds, every easement and 30-year contract enrollment (including substitutions and conversions) must undergo a preobligation IC review. This consists of the following review components as defined in this NI:
 - (i) State/EAB-level review – required on all transactions
 - (ii) Optional State/EAB-level review – required at State/EAB discretion
 - (iii) National-level review – required on all transactions
- (2) Prepayment/closing IC Review – Prior to any payment (including advances) or closing, whichever occurs first, every easement acquisition and 30-year contract enrollment (including substitutions and conversions) must undergo a prepayment/closing IC review. This consists of the following review components as defined in this NI:
 - (i) State/EAB-level review – required on all transactions
 - (ii) Optional State/EAB review – required at State/EAB discretion
 - (iii) National-level review – required on all transactions

Exception: No national level IC reviews will be conducted on ACEP-ALE transactions where the eligible entity is certified. State/EAB level reviews are required consistent with ACEP-ALE policy for prepayment/closing requirements for certified entities.

- (3) Re-Review (preobligation and prepayment/closing) – Re-reviews are conditionally required. The original preobligation or prepayment/closing IC review is no longer valid and must go through the IC process again prior to obligation or payment/closing (including submission of a new national level review request) if, for any reason, between the completion of the IC preobligation review and the execution of the enrollment agreement, or between the completion of the IC prepayment/closing review and the issuance of the payment or easement closing/30-year contract execution:
 - (i) The previous IC review expires.
 - (ii) There is a landowner change (including a change to the members of a landowner entity).
 - (iii) There is a change to the easement value or value documentation (e.g., the appraisal expires).
 - (iv) The acreage or footprint of the easement changes.
 - (v) Any required documents or approvals expire (e.g., extended timelines associated with approved waivers, agreement extension, etc.).
 - (vi) Any amendment to the obligating document, including an extension to the expiration date or a change of the fiscal year for obligations.
 - (vii) Any changes that require the issuance of a new Preliminary Title Opinion from the USDA Office of General Counsel (OGC).
 - (viii) Any changes to the draft deed.
 - (ix) Any changes to the facts or situation of the enrollment that would negate any portion of the review (e.g., changes to offered acres, the footprint of the easement, easement value, appraisal expiration, etc.).
- (4) Other Review Types – EPD may select transactions for alternative IC reviews,

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including post-obligation and post-payment/closing, to ensure compliance with policy or to best manage workload and workflows. The requirements of an alternative IC review may differ, depending on the type and reason for review. Such reviews may include State, EAB, and national-level review components.

B. Reviewer Roles and Guidelines

(1) Reviewer Criteria and General Guidelines

- (i) Knowledge-based reviews – Staff assigned as reviewers should be the most knowledgeable about the program policy and procedures and the requirements for individual transactions.
- (ii) Separation of duties – Reviewers must maintain separation of duties as a critical component of the easement IC process. State and EAB staff must identify primary and alternate staff members to conduct reviews to ensure adequate separation of duties throughout the IC review process.
 - The required State/EAB-level reviews and the Optional reviews must be conducted by two different individuals having knowledge of easement transactions. A single individual must not complete more than one review for the same record and review instance.
 - The State/EAB reviewers must not be the same as the State Conservationist signatory on the obligating document (e.g., Form NRCS-LTP-31, Form NRCS-LTP-40, ALE Agreement, or others), the NRCS Approval Letter to Proceed with the ACEP-ALE Acquisition, the Contract for 30-Year Land Use, or the Warranty Easement Deed.
- (iii) Recusal from reviews – Reviewers must recuse themselves from the IC review in accordance with USDA and NRCS ethics requirements, including if they are the landowner, family or close relation to the landowner or entity, will financially benefit from the transaction, or are in the supervisory chain of the landowner (see Title 110, General Manual, Part 405).
- (iv) Access to Business Tools and Systems of Record – Reviewers must have access to the appropriate business tools and systems of record in order to complete required document uploads and IC-related data elements.

(2) Reviewer Roles – Reviewer roles vary based upon the review type; however, the final approval of all IC review types must be completed by Federal NRCS employees and may not be performed by contractors, volunteers, partners, or other third parties.

- (i) NRCS State/EAB reviewer – This reviewer role is required for all easement IC reviews, and the reviewer in this role must:
 - Complete the “NRCS State/EAB Review” related data in the Program Activity Management Solution (PAMS) request record.
 - Be a Federal NRCS employee that has a working knowledge of easement program policies and procedures.
 - In States not serviced by EAB, it is recommended that the easement coordinator, easement program manager, or Assistant State Conservationist responsible for easements serve as the reviewer.
 - In EAB-serviced States, it is recommended that an EAB Team Leader or Realty Specialist most knowledgeable about the transaction serve as the reviewer.
- (ii) Optional reviewer – This reviewer role is not required for easement IC reviews, however, if the State/EAB elects to utilize an Optional reviewer, then the Optional reviewer:
 - Complete the “Optional Review” related data in the PAMS request record.
 - May be a NRCS employee or non-NRCS (e.g., contractor, partner, or volunteer) personnel that has a working knowledge of the transaction.
 - If a State/EAB chooses to have non-NRCS personnel complete the Optional Review:
 - Such person must be knowledgeable about the individual transaction.
 - The Optional review must be conducted prior to the State/EAB review.

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- (iii) National-level Reviewer – This reviewer role is required for all easement IC reviews, and the reviewer in this role:
- Complete the “National level Review” related data in the PAMS request record.
 - Must complete required data fields in any other appropriate system of record when reviews are complete.
 - Is responsible for completing a national level review for all transactions as specified in Section 300.3C(3)(ii) of this NI.

C. Review Process

- (1) Communication of Required Easement IC Processes and Timelines with Customers
- (i) It is the State’s responsibility to inform landowners and eligible entities about the easement IC process requirements and associated timelines. The timelines outlined in this Section must be taken into account in discussions with landowners and eligible entities regarding timing for obligations, payments, and closings.
- (ii) It is the National IC Team’s responsibility to inform the State/EAB if there will be any variation in the timeline for the national-level review as outlined in 300.3 C(3)(ii).
- (2) Documentation of Reviews
- (i) PAMS Easement IC Review Request
- All reviewers must document their easement IC reviews and certification for all review types on the Easement IC Review Request in PAMS. This is not a document, but data elements within a PAMS request record.
- Note:** Alternative methods for documenting reviews may only be used when provided to States/EAB by EPD to document Other Review Types or as authorized through a National Bulletin.
- (3) Review Process for Preobligation, Prepayment/closing, and Re-Review Types
- (i) State/EAB Reviews and Optional Reviews
- General
 - States/EAB must establish their own review guidelines and processes for the State/EAB reviews and, if conducted, Optional Reviews, of the preobligation, prepayment/closing, and re-review types.
 - In general, a State/EAB certification of a State/EAB review certifies that:
 - The transaction is compliant with all applicable policies (manuals, national instructions, national bulletins, corrective action plans, ratifications, memos, waivers, etc.);
 - All eligibility and other determinations for the entire easement area are supported by appropriate documentation;
 - All signatures (NRCS, landowners, and eligible entities) are supported by adequate signature authority documentation; and
 - Correct form versions are utilized.
 - States/EAB may develop a review checklist or other document to show their review and associated conclusions. This documentation may be uploaded to the system of record to support the national-level IC reviews.
 - The conclusions of the State/EAB and Optional reviews may also be captured in the “State/EAB Comments and Review Notes” section of the PAMS Easement IC Review request.
 - As part of each IC review, States/EAB must upload to the appropriate system of record, all applicable documents from the “Required Document Upload List” (see Section 300.5 “Exhibits”) and, as needed, any supporting documentation relevant to the IC review of the individual transaction. This includes any further documentation requested by a national reviewer during the national level IC review. The “Required Document Upload List” identifies the specific documents that must be uploaded based on the phase of the IC review as preobligation, postobligation, prepayment/preclosing, postpayment/postclosing and as follows:

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- Preobligation List – Documents must be uploaded prior to State/EAB certifying the State/EAB-level preobligation review as complete on the PAMS Easement IC Review request and submitting the transaction for national-level review.
- Postobligation List – Documents must be uploaded within 10 business days of receiving the fully executed documents.
- Prepayment/preclosing List – Documents must be uploaded prior to the State/EAB certifying the State/EAB prepayment/closing review as complete on the PAMS Easement IC Review request and submitting the transaction for national-level review.

Exception: For ACEP-ALE transactions conducted by a certified eligible entity, the documents on the prepayment/preclosing list must be uploaded concurrent with items on the postclosing/payment list.

- Postpayment/postclosing List – Documents must be uploaded within 10 business days of receiving the fully executed documents.
- Timing of State/EAB Reviews
 - States/EAB must complete a State/EAB review of every transaction prior to submission for national-level review and prior to landowner or eligible entity signature on obligation, payment, or closing documents.
 - States/EAB must perform an IC Re-Review on a transaction prior to obligation, payment, or closing if any of the applicable criteria outlined in Section 300.3A(3) are true.
 - States/EAB must take into consideration the expected duration of national-level IC reviews as outlined in Section 300.3C(3)(ii) when submitting packages for national-level IC reviews.
 - If an extraordinary and exigent circumstance occurs where the closing must occur prior to the anticipated national-level IC prepayment review completion date, States/EAB may request an expedited national-level prepayment/closing review (see Section 300.3C(3)(ii)).
 - Expedited reviews are not available for a national-level IC preobligation reviews.
- Submission of transactions for national-level IC review
 - States/EAB must first:
 - Complete their State/EAB review and Optional Review (see Section 300.3C(3)(i));
 - Upload required and applicable supporting documents to the appropriate system of record (see Section 300.4); and
 - Complete and submit the PAMS Easement IC Review request (see Section 300.3C(2)(i)).
 - Once those steps are complete, the State/EAB has submitted the transaction for national-level IC review. The method of submission will only vary if specific guidance is provided by EPD (see Section 300.3C(2)(i)).

(ii) National Level IC Review

- Upon receipt of a complete submission from the State/EAB, the national IC Team will conduct a national-level IC review.
- The type of National-level IC review will be randomly assigned in PAMS for both preobligation and prepayment/closing. The majority of national reviews will be assigned a cursory review with the remaining percentage distributed over the other levels.
- National level review types:
 - No National-Level IC Review (Not Reviewed by the national IC Team)
 - The national IC team will not review any information about the submission.
 - The national IC Team will update the PAMS Review Request and appropriate business tool to indicate that the transaction wasn't reviewed at

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the national level. A PAMS system generated email will also be sent as notification that the national level IC review component is complete for that submission.

- Cursory National-Level IC Review
 - The national IC Team will conduct a presence/absence check of the required documents per Exhibit A (Required Document Upload List) submitted to the official system of record and ensure that the documentation align with the appropriate transaction.
- Level 1 National-Level IC Review
 - The national IC Team will review the completeness of the submittal and the documentation relevant to the following topics, including, as appropriate, but not limited to:
 - Preobligation:
 - Evidence of ownership
 - Landowner/entity eligibility
 - Valuation
 - Draft obligating documents
 - Prepayment/closing:
 - Valuation, including adjustments
 - Landowner/entity eligibility
 - Draft closing documents
- Level 2 National-Level IC Review
 - The national IC Team will review the completeness of the submittal and the documentation relevant to the following topics including, as appropriate, but not limited to:
 - Preobligation:
 - All topics identified in Level 1
 - Land eligibility
 - Access
 - Signature authority
 - Environmental evaluation
 - Preliminary wetland reserve plan of operations (WRPO) and other required plans
 - Compliance with any approved waivers
 - Prepayment/closing:
 - All topics identified in Level 1
 - Executed enrollment agreements and modifications
 - Any ownership transfers or corrections and associated eligibility
 - Boundary surveys
 - Compliance with any approved waivers
 - Title
 - Access
 - Final due diligence
 - Approval to close or proceed
- Level 3 National-Level IC Review.
 - The national IC Team will review the completeness of the submittal and the documentation relevant to the following topics, including, as appropriate, but not limited to:
 - Preobligation:
 - All topics identified in Level 2
 - Title
 - Preliminary due diligence
 - Ranking
 - Use of appropriate business tools to produce and document transaction
 - Prepayment/closing:
 - All topics identified in Level 2

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- Title commitment
- Final due diligence
- Adjustments after survey
- Draft closing instructions
- Closing protection letter/OGC-approved equivalent.
- Use of appropriate business tools to produce and document transaction
- Selection of National IC Review Level
 - The national IC review level will be randomly assigned by the national IC Team at the time the submission is received from the State/EAB.
 - In order to adjust for workload, other review types maybe utilized and the percentage of reviews at the various levels for the random assignment modified.
 - All requests for national level IC reviews on ACEP-ALE transactions where the eligible entity is certified will be assigned a “no national level IC review.” National reviewers will not review certified entity records. State/EAB are still required to conduct the State/EAB level IC review.
- Timing and State planning
 - If a submission is assigned the review type “No National level review” the State/EAB will receive written notification through a PAMS generated email to proceed within 5 business days.
 - If a submission is assigned a cursory level national IC review, the national IC review will take up to 10 calendar days to complete after the state/EAB submits a complete package.
 - Submissions will be reviewed to ensure that critical documents are present.
 - If a submission does not have the required documents present the PAMS ticket will be ‘Returned’ and states must submit a new ticket once the missing documents have been loaded.
 - If a submission is assigned a Level 1, 2, or 3 national IC review, the national-level IC review will take up to 30 calendar days after a complete submission is received from a State/EAB, except in the following situations:
 - When a submission is determined to require additional State/EAB follow-up, the State/EAB will be notified of the follow-up needed, the 30-day review timeframe is suspended and will begin again only after all identified items have been provided by the State/EAB.
 - When a submission is referred outside of the national IC review process back to a State/EAB or to an EPD specialist, the State/EAB will be notified of the issue, and the 30-day review timeframe is no longer in effect. The national IC Team will identify a new timeframe pending resolution of the identified issue.
 - Reviews that are returned to the State/EAB from the national IC reviewer with a request for clarification or other needed follow-up and are not submitted back to the IC reviewer within 30 calendar days will be considered to be withdrawn from the national IC review process. The State/EAB will be notified of this action by the national IC Team via a PAMS system generated email and, if applicable, the data in the appropriate system of record will be updated accordingly. The State/EAB must resolve any outstanding issues and then submit a new PAMS Review request for national-level IC review.
 - National-level IC Review Duration Exceptions and Process
 - Expedited Prepayment/Closing Reviews – If a State/EAB requests an expedited review of a prepayment/closing package, the process below must be followed after submitting for national-level IC review.

Note: EAB will work with the EPD EAB Branch Chief instead of the State conservationist.

- The State conservationist will sign the “Easement Internal Controls Expedited Review Request” indicating that an expedited review is

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- being requested.
- The State conservationist must send an email to the appropriate RC with a copy to NRCS.InternalControls@wdc.usda.gov explaining the basis for requesting an expedited national-level review and include the following:
 - Agreement number.
 - PAMS Review request number.
 - Expiration date of current agreement.
 - Anticipated closing date.
 - Status of acquisition (e.g., PTO received, NRCS-CPA-1268, etc.).
 - Dates of completion State/EAB IC reviews.
 - A brief description of the circumstances surrounding the need for an expedited review, including why the package was submitted with less than 30 days for review.
 - The subject line should read: “Easement Internal Controls Expedited Review Request [INSERT AGREEMENT/PARCEL NUMBER].”
 - Attach the “Easement IC Expedited Review Request” with completed EAB/State Comments box and State Conservationist EAB Branch Chief signature box completed.
 - RCs will determine if a request to expedite is approved or denied. If the request to expedite the review is approved, the RC will sign the “Easement Internal Controls Expedited Review Request” and email it to the national IC inbox (NRCS.InternalControls@usda.gov) for expedited processing. If not approved, the RC will inform the State conservationist with a copy to the national IC inbox. The State/EAB will upload the completed Expedited Review Request to the appropriate system of record within 3 business days of receipt.
 - Expedited review requests will be tracked and reported to leadership on at least an annual basis.
 - An approved expedited review will be addressed by the National IC Review Team within 3 business days, but the quality of the package submitted and the time to respond to any follow up items will be factors in the time to completion of the review.
- Expiration of IC reviews
- Completed State/EAB and national reviews have an expiration.
 - Preobligation reviews must be completed within three months prior to the obligation of funds. If the completion of the review occurred more than three months before the planned agreement execution date, a new preobligation review (State/EAB, Optional, and national-level, where applicable) must be performed. Preobligation reviews completed in a prior fiscal year can only be used in the fiscal year they are approved; a new preobligation review must be completed in the same fiscal year as the agreement execution.
- Exception:** EWPP-FPE enrollments using appraisals maybe able to cross the fiscal year.
- Prepayment/closing reviews must be completed within six months prior to payment and closing. Closing with these reviews must occur before the expiration of any agreements, required components, or valuation.

300.4 Systems of Record and Business Tools

A. General

- (1) If a document or data is generated in a system other than the system that documents the enrollment record, such as Conservation Desktop (CD), it is not required to re-upload that document or data in the system of record as long as it is accessible by other users for review. States/EAB should keep a record of this documentation in the casefile to

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document the state of the transaction prior to obligation and payment/closing.

- (i) National IC Team staff will access various NRCS business tools to review the documentation.
- B. Program Activity Management Solution (PAMS) – PAMS is the primary system for documenting IC reviews and is the primary communication tool between States/EAB and the national IC reviewers for all programs beginning in fiscal year 2021.
- (1) PAMS general requests with the type “National Internal Controls Service” will serve as the request for national-level review and review results will be communicated back to the State or EAB using the same NEST maintenance request.
 - (i) State/EAB will select the Transaction Stage of ‘Preobligation’ for the submission of the preobligation IC review.
 - (ii) State/EAB will select the Transaction Stage of ‘Re-Review Preobligation’ for the submission of a re-review preobligation IC review.
 - (iii) State/EAB will select the Transaction Stage of ‘Pre-Payment/ Closing’ for the submission of the prepayment/closing IC review.
 - (iv) State/EAB will select the Transaction Stage of ‘Re-Review Pre-Payment/Closing’ for the submission of a re-review prepayment/closing IC review.
 - (2) PAMS will serve as a document repository for the IC reviews only when the system of record is not available when the PAMS IC service request is submitted.
- C. National Easement Staging Tool (NEST) – NEST is the system used to document enrollment information and store documents for ACEP-WRE, HFRP, EWPP-FPE, ACEP-ALE from fiscal year 2019 and prior, and RCPP FB2014 enrollments.
- (1) Although IC-related NEST data elements still exist, the State/EAB is not responsible for this data entry. All IC-related NEST data elements will be completed by EPD.
 - (2) The NEST documents page specific to each transaction will be utilized to store and share documents required for all applicable reviews.
 - (3) States/EAB are required to load executed and final documents post-obligation and post-payment/closing for all packages, including those related to ACEP-ALE parcels acquired by Certified Entities that did not undergo an IC review. Items required to be loaded to NEST are identified in the Required Document Upload List (see Section 300.5 Exhibits).
- D. ProTracts – ProTracts is the system used to document enrollment information for ACEP-ALE for fiscal year 2020 and forward. ProTracts DMS is the system used to store documents for these program agreements and associated parcels.
- (1) States/EAB are required to maintain and provide upon request final documents post-obligation and post-payment/closing for all packages, including those related to ACEP-ALE parcels acquired by Certified Entities that did not undergo a prepayment/closing IC review. Items required to be maintained and readily accessible are identified in the Required Document Upload List (see Section 300.5 Exhibits).
- E. Conservation Assessment Ranking Tool (CART) – All data entered and all documents created in CART do not need to be uploaded into ProTracts DMS or NEST. The IC reviews will include accessing the information in CART.
- Exception:** If the records created in CART are only temporary or changeable (e.g. ranking detail report, etc.), the record must be exported and uploaded to the system of record where the application resides.
- F. Conservation Desktop (CD) – CD is the system used to document enrollment information and store documents for RCPP18 entity-held and US-held easements. All data entered and documents created in CD do not need to be uploaded into ProTracts or NEST. The IC reviews will include accessing the information in CD and the document management system.
- Exception:** If the records created in CD are only temporary or changeable (e.g. Conservation Plan, Map, NRCS-CPA-115, etc.), the record must be exported and uploaded to the system of record where the application resides.

300.5 Exhibits

- A. REQUIRED DOCUMENT UPLOAD LIST (September 2020)
- B. EASEMENT INTERNAL CONTROLS EXPEDITED REVIEW REQUEST (May 2020)
- C. ARCHIVED – EASEMENT INTERNAL CONTROLS REVIEW RECORD (May 2020)
- D. ARCHIVED – ACEP-ALE SUBSTITUTE PARCEL PREOBLIGATION IC REVIEW CHECKLIST (June 2019)
- E. ARCHIVED – ACEP-ALE PREOBLIGATION PARCEL IC REVIEW CHECKLIST (June 2019)
- F. ARCHIVED – ACEP-ALE PREOBLIGATION AGREEMENT IC REVIEW CHECKLIST (June 2019)
- G. ARCHIVED – ACEP-ALE PREPAYMENT/CLOSING IC REVIEW CHECKLIST (June 2019)
- H. ARCHIVED – ACEP-WRE PREOBLIGATION IC REVIEW CHECKLIST (May 2019)
- I. ARCHIVED – ACEP-WRE PREPAYMENT/CLOSING IC REVIEW CHECKLIST (May 2019)
- J. ARCHIVED – EWPP-FPE PREOBLIGATION IC REVIEW CHECKLIST (July 2019)
- K. ARCHIVED – EWPP-FPE PREPAYMENT/CLOSING IC REVIEW CHECKLIST (July 2019)
- L. ARCHIVED – HFRP PREOBLIGATION IC REVIEW CHECKLIST (July 2019)
- M. ARCHIVED – HFRP PREPAYMENT/CLOSING IC REVIEW CHECKLIST (July 2019)
- N. ARCHIVED – RCPP IC REVIEW COVERSHEET (June 2015)
- O. ARCHIVED – REQUEST FOR CONSIDERATION OF NATIONAL LEVEL REVIEW THRESHOLD ADJUSTMENT (June 2015)
- P. ARCHIVED – FARM AND RANCH LANDS PROTECTION PROGRAM PREPAYMENT/CLOSING IC REVIEW CHECKLIST (June 2015)
- Q. ARCHIVED – GRASSLAND RESERVE PROGRAM PREPAYMENT/CLOSING IC REVIES CHECKLIST (June 2015)
- N. ARCHIVED – WETLAND RESERVE PROGRAM PREPAYMENT/CLOSING IC REVIEW CHECKLIST (June 2015)