TO: National Office Officials
    Agency Administrators
    State Directors

ATTN: Rural Business-Cooperative Service, Rural Housing Service, and
    Rural Utilities Service (Headquarters, State, and Local),
    Servicing Office

FROM: Tony Bainbridge /s/ Tony Bainbridge
      Chief Financial Officer

SUBJECT: Utilization of the Do Not Pay Portal

PURPOSE

This Unnumbered Letter (UL) is being reissued to provide clarification and
guidance on the use of the Do Not Pay (DNP) Portal to prevent fraud, waste,
and abuse of federal funds.

BACKGROUND

Chapter 33 of Title 31 of the United States Code (USC) was amended by the
Payment Integrity Information Act of 2019 (PIIA). Per 31 USC 3354, at a minimum
and before issuing any payment or award, each executive agency shall review as
appropriate the data sources accessed to verify eligibility of the payment and award.

IMPLEMENTATION RESPONSIBILITIES

In consultation with the Office of General Counsel (OGC) and the USDA Office of
the Chief Financial Officer (OCFO), the following data sources are available for
Rural Development (RD) programs within the DNP Portal:

- Credit Alert System (CAIVRS)
- Health & Human Services (HHS) List of Excluded Individuals & Entities - Public
  (LEIE-PUB)
- System for Award Management (SAM) Entity Registration Records (SAMENT)
- Social Security Administration (SSA) Death Master File (DMF)
- System for Award Management (SAM) Exclusion Records – Restricted (SAM-
  EXCL-RES)
- Treasury Offset Program (TOP) Debt Check (DBCK)

EXPIRATION DATE: September 30, 2022

FILING INSTRUCTIONS:
Administrative/Other Programs
RD’s Chief Financial Officer designated the DNP Portal as the approved system for accessing data sources for RD staff involved in loan, grant, or guarantee pre-award and pre-payment actions to complete the required verifications. This UL provides clarification to RD staff on the stages for screening required participants to reduce improper payments. The DNP Portal at https://fiscal.treasury.gov/DNP/ compiles information from the applicable data sources available to RD as described above.

Standard Definitions

Do Not Pay Coordinator - The Coordinators provide oversight of the DNP system and policies for RD. They hold the highest level of administrative authority in the DNP Portal for RD and are located with the Office of Compliance Internal Compliance Division (ICD). The Coordinators provide guidance and support to all Local Security Administrators (LSAs) of RD, can act as backup LSAs as needed, acting LSAs in Access Groups as needed, and create and provide training to Portal Users and LSAs within the Agency.

Data Universal Numbering System (DUNS) – A unique nine-digit identifier for a business created by credit bureau Dun and Bradstreet.

Employer Identification Number (EIN) – A nine-digit number randomly assigned by the Internal Revenue Service (IRS) to identify a business entity.

Lower Tier Participant – For the purposes of this UL, is defined as a party in a transaction with the prime recipient.

Lower Tier Recipient – For the purposes of this UL, is defined as a recipient of funds in a transaction from a prime recipient.

Local Security Administrator (LSA) – DNP LSAs oversee an Access Group (a group of Portal Users with similar access level). They provide the enrollment, modification, and deactivation of Users within the Access Group and conduct Annual Recertification. LSAs are the primary DNP point of contact for the Portal Users of their respective Access Group. LSAs have access to the DNP Portal but only to review reports.

Portal User – Portal Users are members of an Access Group. They have access to the DNP Portal’s search functions. Portal Users are at all levels of the Agency.

Prime Recipient – A participant receiving a federal award directly from the agency.

Principal –
(a) An officer, director, owner, partner, principal investigator, or other person within a participant with management or supervisory responsibilities related to a covered transaction; or
(b) A consultant or other person, whether or not employed by the participant or paid with Federal funds, who—
   (1) Is in a position to handle Federal funds;
   (2) Is in a position to influence or control the use of those funds; or,
   (3) Occupies a technical or professional position capable of substantially influencing the development or outcome of an activity required to perform the covered transaction.

(2 CFR 180.995)
Social Security Number (SSN) - A nine-digit number randomly assigned by the Social Security Administration (SSA) to identify an individual.

Tax Identification Number (TIN) – The identification number used by the IRS.

Unique Entity Identifier (UEI) – The official name of the new, non-proprietary identifier that will replace the DUNS number in SAM.gov as the SAM number effective April 4, 2022. An alpha numeric identifier used to identify a specific entity.


**DNP Portal Access**

**DNP Enrollment**

Access to the DNP Portal requires enrollment through the Department of Treasury. The interested enrollee should contact the applicable DNP LSA who will request the enrollment. A list of DNP LSAs by state and program area may be found online, https://usdagcc.sharepoint.com/sites/rd_cfo/icd/DoNotPay/Lists/LSA/AllItems.aspx.

The enrolling employee must have the following:

- A functional, physical LincPass
- A concurring Supervisor
- Meet Department of Treasury eligibility requirements

More details including information on the enrollment process can be found in the USDA RD DNP Portal Guide. Guidance for the LSA to request enrollment and information regarding the structure and hierarchy of the Do Not Pay system access may be found in the Local Security Administrator Guide. Both documents can be found on the RD Do Not Pay SharePoint site, https://usdagcc.sharepoint.com/sites/rd_cfo/icd/DoNotPay/SitePages/Guidance.aspx.

**Access Maintenance**

All registered users of the DNP Portal are responsible for maintaining their access. This includes both LSAs and Portal Users. The Aging Rules, as established by the Bureau of the Fiscal Service (BFS), for this access are as follows:

**Suspended**: All user accounts that have not logged into the DNP Portal for 120 days will have an account status change to “suspended”.
- Suspended users must call the Do Not Pay Technical Help Desk at 855-837-4391, option 1, to have their account restored for access to the DNP Portal.

**Deleted**: All user accounts that have not logged into the DNP Portal for 13 months will be “deleted”.
- To regain access to the DNP Portal, deleted users must complete the DNP enrollment process as described above.
To maintain access, users should set two reminders:

1. Log into the DNP Portal, https://fiscal.treasury.gov/DNP/, at least once every 120 days.


If a user no longer requires access to the DNP Portal or will be on extended leave for more than 180 days, the Supervisor must notify the LSA for the user to be deactivated promptly.

Communication Protocol

Due to the large number of Users within RD, a communication protocol has been established per BFS, Department of Treasury and USDA OCFO. DNP Portal Users and RD Staff are to contact their DNP LSA with all questions regarding DNP.

If the DNP LSA is unable to provide assistance, they will contact an Agency DNP Coordinator. If further expertise is required, the DNP Coordinator will contact the OCFO liaison who will consult the Department of Treasury liaison as needed.

DNP Screening

Who to Screen

All applicants of RD programs must be screened.

All lenders participating in guaranteed programs must be screened for program eligibility. They are also to be screened during program recertification.

All participants and principals receiving a payment directly from the agency must be screened.

**An entity must be screened as well as its principals.** This is to include for-profit entities, nonprofit organizations, states, local governments, and federally recognized tribes. Refer to the definition of principals provided above to determine who is applicable to screen. For further clarification, please refer to the applicable program area staff for guidance.

See the attached table for reference.

How to Screen

To conduct a screening, it is important to use the best search factors as described below:

**Entity** = EIN/TIN + Entity Name + DUNS (include for best search)

**Individual** = SSN/TIN + First Name + Last Name

Select the applicable data sources to be screened as indicated in the attached table. Do not utilize the “Select All” option. For complete guidance how to conduct a screening, visit Section 5.2, Searching an Individual, of the RD DNP Portal Guide.
When to Screen

There are multiple stages throughout the process of a loan, grant, or guarantee that are appropriate for screening participants in the DNP Portal. Some stages may overlap depending on the program or the available funding stream. Participants identified in the attached table must be screened at the following stages:

- Lender Eligibility
- Lender Recertification
- Application
- Prior to Obligation/Approval
- Prior to Closing
- Prior to each Disbursements

The screening should occur prior to the final decision or award at these stages.

Screening prior to obligation should be completed within 5 business days before transmitting the file to the state office/national office when applicable or within 5 business days prior to the obligation signature/approval, depending on the state process.

Screening for closings should be completed within 5 business days before the date of closing.

Screening for disbursement should be completed within 5 business days prior to disbursement of funds. Disbursements to be screened are to recipients receiving funds directly from the agency. Disbursements from a Supervised Bank Account (SBA) do not require screening. Please see an exception for Single Family Housing (SFH) SBA lower tier recipients in the attached table.

Screening within 30 days from the last completed screening is not required. For example, the pre-obligation screening was completed June 1, 2021. The closing preparation is occurring on June 14, 2021. That is 13 days since the last screening. Closing screening is not required since it is less than 30 days.

See the attached table for screening requirements.

A finding or match in the DNP Portal does not constitute a denial, non-payment, or that a project must be discontinued. Guidance to locate and interpret match results may be found in Section 5.4, Data Source Details, of the RD DNP Portal Guide. The Loan Approval Official refers to applicable program guidance to determine how to proceed.

Note: Any debt that has been filed and settled as a debt with Treasury Offset Program (TOP) Debt Check (DBCK) becomes a federal debt and is subject to offset.

DOCUMENTATION REQUIRED

The RD staff must ensure documentation of the screenings within the DNP Portal are placed in the casefile. All documents may be electronic or hard copy as appropriate.

The following must be included in the documentation printed from the DNP Portal:

- Portal User who conducted the screening
- Access Group
- Date of screening
• Factors used to conduct the screening
  o First Name and Last Name
  o TIN, EIN, or SSN
  o Business Name
  o DUNS number (UEI effective April 4, 2022)
• Data Sources screened
• Results of the screening

Guidance to print or save this information for the casefile may be found in the USDA RD DNP Portal Guide, Section 5.3, Documentation of DNP Results.

In addition, the Loan Approval Official must fully document any decisions or actions taken because of the findings within the DNP Portal and place the decision in the casefile.

RESOURCES

Additional information regarding Do Not Pay for Rural Development may be found on the RD DNP SharePoint Site at https://usdagcc.sharepoint.com/sites/rd_cfo/icd/DoNotPay/SitePages/Home.aspx. Including, but not limited to, the following:

• RD DNP Training Schedule
• USDA RD DNP Portal Guide
• Local Security Administrator Guide
• Contacts
• RD DNP Newsletter
• Link to this UL

If there are any questions, please contact Heather Honkomp, DNP Coordinator and Program Analyst at 515-284-4486 or heather.honkomp@usda.gov.

Attachment:

Sent by electronic mail on September 28, 2021 at 3:30 pm by Office of Compliance, Internal Compliance Division. The Agency Administrators, State Directors, and National Office Officials should advise other personnel as appropriate.