



September 15, 2011

To: USDA Risk Management Agency

From: The National Association of Wheat Growers

Re: Comments for Acreage Reporting Streamlining

The National Association of Wheat Growers (NAWG) is submitting the following comments in response to the request for information on the Proposed Rule no. 42590 published on July 19, 2011 entitled "Improving Common Acreage Reporting Processes."

The U.S. Department of Agriculture (USDA) Risk Management Agency (RMA) and Farm Service Agency (FSA) published this Federal Register request for input to help USDA improve services and reduce duplication of effort, including collecting information from the public. FSA and RMA have been working on a joint, coordinated initiative to have a common USDA framework for producers to report information to participate in certain USDA programs. As part of the continued Acreage/Crop Reporting Streamlining Initiative (ACRSI) implementation effort, USDA expects the ACRSI will expand on the success of the Comprehensive Information Management System (CIMS), which compiles common producer, program and land information collected by FSA, RMA and approved crop insurance companies (AIP).

Standing NAWG policy supports FSA and RMA working closely together in order to reach an agreement on acreage reporting deadlines. Our members believe this would enable producers to report to the FSA and crop insurance agency more accurately; eliminating acreage reporting errors and discrepancies between the two agencies.

NAWG has compiled further comments based on respondents to specific questions to wheat growers which incorporate some of their experiences and observations working with these agencies under real-world circumstances.

COMMENTS:

(1)What are the potential benefits for reliability, accuracy, and practicality in a common acreage reporting for use by both RMA and FSA?

The duplication of duties has been evident to producers in crop reporting and production reporting. USDA should work to better streamline acreage reporting to meet all of USDA's program needs.

Acreage reports should be more widely shared between agencies, when applicable, through more updated automated systems in order to reduce duplication.

NAWG believes that if USDA more fully utilizes available technologies to collect and share information, then a lesser burden would be placed on producers having to submit the same or similar information, costing them valuable time and money. RMA and FSA have effectively served the farmers for decades. NAWG believes that better access to modern technology will allow these employees to better utilize their time more efficiently and would benefit both USDA and the producer in the field.

(2) Are there reporting requirements that have become outdated and, if so, how can they be modernized to accomplish their objectives better?

There is significant interest in exploring a more effective delivery of crop insurance. USDA should carefully examine opportunities to use improved interagency communication and sharing of reporting information through the use of available technology where possible. Past reports of fraud and abuse in crop insurance could be better addressed with improved information handling. There is significant interest from growers in exploring existing online technology and modern electronic tools to reduce repetitive acreage reporting when that information does not change or need to be collected from year to year.

(3) Do USDA agencies, when viewed in terms of multiple agencies such as RMA, FSA and NRCS, currently collect information in the most effective way in order to achieve regulatory objectives?

While USDA officials at RMA, FSA and NRCS are generally well trained in executing administrative duties, NAWG believes that providing these employees with improved technology and information gathering capabilities could make these employees even more effective, to benefit both the taxpayer and the farmer.

(4) Are there reporting requirements or application processes that are unnecessarily complicated, or that could be streamlined to achieve the objectives in ways that are more efficient?

A significant improvement for the producer would be to minimize the number of trips a farmer has to make to the FSA office. Using the state of Oregon as an example: RMA requires a January 30 crop reporting deadline while FSA has a June 30 deadline; with the caveat that acres cannot be reported prior to planting. Therefore farmers who plant and insure winter wheat need to report by January 30. But because they may plant corn in mid-June these farmers have to make multiple visits to FSA and/or insurance offices after the second planting. This policy should be revisited, allowing for online reporting that would minimize unnecessary visits to the FSA office.


(5) Are there application processes or reporting requirements that have been overtaken by technological developments? Can new technologies be used to modify, streamline, or do away with existing reporting requirements?

Many producers believe that there are numerous duplications within the USDA interagency system when viewed through the prism of the rapid advances in technology in contrast with the age of the systems and programs throughout USDA. There is a universal desire from growers that all efforts to take advantage of new technology at USDA should be explored.

One grower used an example that it only takes him five minutes to get in and out of FSA in order to certify acreage, the longest part of this process being entering the information into the computer and waiting for the printer to put forth the paper. This particular grower states that he was fortunate to live in the same town as the FSA office, because he is all too familiar with other growers who are not so fortunate who have to travel great distances to do five minutes of computer work that in the modern era could be completed online. The common thread throughout the comments received from growers was that USDA needs to take advantage of the technology that is now widely available throughout the public and private sectors. NAWG believes that these technology upgrades can and should be accomplished, but must only be done while ensuring the strictest and most secure privacy assurances. This move into the digital age for USDA will benefit the grower, the USDA employee, the crop insurance agent and, finally, the U.S. taxpayer.

The National Association of Wheat Growers would like to thank USDA-RMA for the opportunity to submit these comments on behalf of our member growers.

Sincerely,

A handwritten signature in cursive script that reads "Dana Peterson".

Dana Peterson
CEO