

March 25, 2016

The Honorable Tom Vilsack  
Secretary  
United States Department of Agriculture  
1400 Independence Ave. SW  
Washington, DC 20250

Dear Mr. Secretary:

The 2014 Farm Bill requires the USDA to maintain and upgrade information management systems and to develop and implement an acreage report streamlining initiative project. Mandatory funds were authorized with an additional \$10 million in funding available upon completion of the Acreage Crop Reporting Streamlining Initiative (ACRSI).

We are pleased with the progress on this initiative over the past two years and hope you will soon be able to secure the \$10 million in additional funding. It is imperative that this funding be targeted to areas where upgrading the systems will have a real impact on farmers.

Each year, farmers are required to go to their county Farm Service Agency (FSA) office to certify the number of acres, crops planted, planting date and crop share for each field planted, and farmers go through a similar process with their federal crop insurance agent to submit information to the Risk Management Agency (RMA). If this acreage is not certified with USDA, farmers risk losing their eligibility for farm programs delivered through FSA and any premium subsidies provided by RMA with which to purchase crop insurance.

The intent of ACRSI was to eliminate reporting the same information to multiple agencies. (We understand that some information will be “unique” to one of the entities. For example, information on the Conservation Reserve Program only needs to be reported to FSA.) While there has been progress toward reaching the goal of one-stop reporting and remote reporting, the current system still suffers from inefficiencies that cost farmers and taxpayers.

Many farmers now use Global Positioning System (GPS) monitors in conjunction with precision farming technologies. This should ensure certification is not a burdensome or time-consuming process. These technologies capture the acreage, crop and date on which a field was planted, yet farmers are still finding it difficult to certify their acres using precision ag systems.

Reconciling overlapping, yet slightly different, data is one of the major issues that needs to be addressed before precision agriculture can be seamlessly integrated with the acreage reporting process. For example, when a farmer brings in data to the FSA office showing that the GPS monitor registers a different planted area (shape and acres) than the Common Land Unit (CLU), the acreage reporting policies, processes, and systems need to account for this difference annually. The permanent boundaries may not change; however, annual increases or decreases in actual acres will be different.

Producers are unable to accurately certify because FSA is unable to accept GPS data. For many years, farmers have been told that FSA planted acres are the only acres they can use to participate in USDA programs. That should no longer be the case with the advent of GPS data and related technology. Precision ag will track these changes in planted acreage while the traditional acreage reporting often has the producer telling FSA that the entire field was planted to the crop.

We hope USDA will target a significant portion of the \$10 million to make progress in the following ways:

- USDA should invest in technology to streamline acreage reporting in county offices.
- USDA should invest in the ACRSI third-party channel by publishing standards, developing a certification process, electronically sharing Common Land Unit (CLU) information if approved by the producer, and accepting electronically signed ACRSI files from the producer or land owner's chosen third party provider. This would be similar to the way the Internal Revenue Service allows signing of tax documents in products like TurboTax. These updates would benefit farmers financially by enabling them to accurately report planted and unplanted acres within a CLU by using the precision ag data collected by their farm equipment. We understand a third-party provider for the 2015 spring third-party pilot reported a \$1,300 or 4 percent average premium savings for producers who reported their acreage using their precision ag data files. Such an upgrade would also financially benefit USDA by saving staff input time at county FSA offices. In addition, the focus of county FSA personnel would be altered from keying in a farmer's data to reviewing and approving ACRSI reports received electronically. Again, we understand the spring ACRSI pilot demonstrated a decrease in producer time and "wait time" in FSA county offices and allowed county office staff to handle errors, omissions and CLU reviews during the acreage reporting season.
- USDA should invest in further automating the process for obtaining E-Auth Level 2 access. A farmer should be able to complete the entire certification process from his or her own computer rather than doing some of it from there, but still being required to physically go to the county office to show identification.
- USDA should enhance the FSA *farm+* website to be the focal point for the producer for USDA program participation. Access should be provided to a) CLU information including the ability to electronically share these with their trusted advisor or the software product of choice (e.g., third-party ACRSI reporting or Farm Management Information Systems); b) historical acreage reports; (c) production reports; and (d) Farm Service Agency and Risk Management Agency program information.
- USDA should eliminate a current hurdle that prevents producers from reaching the one-stop reporting goal. Last spring, USDA piloted a program in conjunction with a technology firm in 30 counties in Iowa and Illinois to streamline the reporting process. The pilot was expanded to 15 states last fall and is scheduled to be expanded to 13 crops in all 50 states this spring. Farmers are and will be able to report their acreage either at

their county FSA office or with their crop insurance agent, rather than being required to report to both entities. Unfortunately, participants still have to sign paperwork at both entities.

- USDA should promote ACRSI by creating white papers on the process that define the benefits to farmers and crop insurance agents. This is critical as it will provide some validity to ACRSI if USDA promotes the benefits of the program. Training about ACRSI for FSA employees, crop insurance company employees, crop insurance agents and farmers would be a wise use of funding. We would be happy to assist you in meeting with farmers at the local level to carry out such an initiative.

We look forward to working with you to ensure prompt transfer of the \$10 million and wise choices in utilizing those additional funds.

Sincerely,

American Farm Bureau Federation  
American Soybean Association  
National Association of Wheat Growers  
National Barley Growers Association  
National Corn Growers Association  
National Cotton Council  
National Farmers Union  
National Sorghum Producers  
National Sunflower Association  
US Canola Association  
US Dry Bean Council  
USA Dry Pea & Lentil Council  
USA Rice

Cc: Alexis Taylor, Acting Under Secretary for Farm and Foreign Agricultural Services  
Val Dolcini, Administrator, Farm Service Agency  
Brandon Willis, Administrator, Risk Management Agency