

May 11, 2016

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

Dear Mr. Secretary:

We are writing you concerning a matter that impacts many farmers and ranchers across the country.

On December 15, 2015, USDA released a final rule (*Payment Limitations and Payment Eligibility*) that modifies the definition of “actively engaged” in farming, to determine farm bill eligibility for active managers of farms that operate as joint ventures or general partnerships, consistent with the direction and authority provided by Congress in the 2014 Farm Bill. Due to these revised definitions of active farm management and actions that activate farm management, many operations will have to restructure, in order to comply with these new regulations.

Unfortunately, in many states, the local county Farm Service Agency (FSA) staff were just recently trained by the state FSA staff on these regulatory changes during the month of March 2016, which has caused a major delay in getting this information out to all potentially impacted producers. Many producers also received a letter dated March 28, 2016 from the Washington office of FSA notifying them of these significant changes, many of which may impact their farm. Most farming operations have negotiated lease agreements, secured production financing, made crop insurance decisions, selected which varieties of commodities to plant, and in many cases, put seed in the ground by this date. Unfortunately, the deadline to file any status changes within a farm structure with FSA is June 1, 2016, less than a month from now, well after these important decisions have been made.

Many producers have contacted the undersigned organizations concerning these changes that are now in effect, and are alarmed by the fact that many will have to restructure their operation during the middle of this growing season. With so much uncertainty within the commodity markets and overall farm economy at this time, this additional burden will bring about a real hardship for many farm families.

With these numerous factors in mind, the undersigned organizations request an extension of the status change deadline of June 1. We respectfully request an additional seven months (revised deadline of December 31, 2016) be granted to allow the impacted farms the ability to complete the growing season and make the necessary changes by the end of the calendar year.

Again, we appreciate your consideration of this request and look forward to hearing from you at your earliest convenience given the timeliness of this request.

Sincerely,

Ag Council of Arkansas  
Alabaman Cotton Commission  
Alabama Farmers Federation  
Alabama Soybean and Corn Association  
American Farm Bureau Federation  
American Soybean Association  
Arizona Cotton Growers Association  
Arizona Farm Bureau Federation  
Arkansas Farm Bureau Federation  
Arkansas Soybean Association  
Arkansas Rice Farmers  
Arkansas Rice Federation  
Blackland Cotton & Grain Producers, Inc.  
California Cotton Growers & Ginners Association  
California Rice Commission  
Colorado Farm Bureau Federation  
Cotton Producers of Missouri  
Delta Council  
Florida Farm Bureau Federation  
Georgia Cotton Commission  
Georgia Farm Bureau Federation  
Georgia-Florida Soybean Association  
Illinois Soybean Alliance  
Iowa Soybean Association  
Kansas Soybean Association  
Kentucky Soybean Association  
Louisiana Cotton & Grain Association  
Louisiana Farm Bureau Federation  
Louisiana Rice Growers  
Louisiana Soybean Association  
Massachusetts Farm Bureau Federation  
Michigan Soybean Association  
Mid-Atlantic Soybean Association  
Mississippi Farm Bureau Federation  
Mississippi Soybean Association  
Missouri Farm Bureau Federation  
Missouri Soybean Association  
National Corn Growers Association  
Nebraska Soybean Association  
New York Corn & Soybean Growers Association  
New York Farm Bureau Federation

National Cotton Council  
National Sorghum Producers  
North Carolina Cotton Producers  
North Carolina Soybean Producers Association  
North Dakota Soybean Producers Association  
Ohio Soybean Association  
Oklahoma Cotton Council  
Oklahoma Soybean Association  
Plains Cotton Growers, Inc.  
Rolling Plains Cotton Growers, Inc.  
Southern Cotton Growers, Inc.  
Southern Cotton Ginners, Inc.  
South Carolina Farm Bureau Federation  
South Carolina Cotton Board  
South Carolina Soybean Association  
South Dakota Soybean Association  
Southern Peanut Farmers Federation  
South Texas Cotton & Grain Association  
Southern Rolling Plains Cotton Growers  
SJV Quality Cotton Growers Association  
Southwest Council of Agribusiness  
Tennessee Farm Bureau Federation  
Tennessee Soybean Association  
Texas Farm Bureau Federation  
Texas Soybean Association  
USA Rice Federation  
U.S. Rice Producers Association  
Virginia Soybean Association  
Wisconsin Soybean Association