

(sent 9-16-11)

I applaud USDA for realizing the gains in efficiency for collaboration within its agencies, and the desire to share the same data collected and needed by the different agencies.

My viewpoint about ACRSI below come from over 26 years as a crop insurance agent, actual farming for over 30 years, experiences and feedback from working with farmers/FSA offices/government programs, ever changing USDA regulations, and legislation that directly affects agricultural producers. In short, I have a broad background and believe my opinions and suggestions to be valid and justified.

1. CIMS is a good start toward sharing of data. However, from a crop insurance agent standpoint, I find the lack of access to FSA maps normally attached to a 578 to be a shortcoming. These maps are the farmer's worksheets that support what is keyed to generate a 578, and without them, it is hard to determine if the 578s are entirely accurate. There also appears to be a significant lag time from when an edited CLU boundary, change in FSA farm/tract/field number, or simply the acres reported to FSA reach an RMA affiliate such as myself. CIMS is a start in the right direction, but needs refinement and full open/direct access to it. Many agents write for multiple AIPs, thus requiring the use of each AIP's software. Can CIMS be made directly accessible by an authorized user without having to access it via a 3rd party such as an AIP?

2. FSA, like any agency or business is staffed by humans and thus subject to error. Our crop insurance agency tries to be cooperative in our working relationship with FSA...that being the servicing of our (also human) farmer clients. It is not uncommon for us to discover errors with the FSA 578 during our acreage reporting process. Regardless of whether the error was caused by the farmer or FSA, there is not a clear-cut, quick, efficient, and friendly means of revising inaccurate 578 and maps, which is a key document that USDA requires during the loss payment procedures of an RMA reinsured crop insurance policy. In fact, several FSA county offices clearly stated to my agency (and to other agents I have spoken with in 2011), that no revisions to the 578 will be made simply because a discrepancy was discovered during the crop insurance acreage reporting process. Note: some of these discrepancies are due to the different rules FSA must follow vs the rules we must follow per RMA.

3. While FSA has the GIS tools to accurately measure acreage, farmers are still required to (verbally) estimate how many acres are planted within a CLU that has been planted to multiple crops or to a CLU with boundary changes. FSA seldom uses the tools it has at hand to help those farmers that lack the technology/knowledge to accurately report acres as required by both FSA and RMA. My agency has developed GIS software to assist growers with such CLU splits and acreage determinations, and they often stop at our office first for "mapping services" before going to certify at FSA. This is more the norm than the exception, so why not allow crop insurance agents assist to producers in meeting all USDA acreage reporting requirements in one stop at our office?

4. I am told of lay-offs and downsizing at FSA offices across the nation. In addition, FSA offices are open to the public from only about 8:00 am to 4:30 pm, Monday through Friday. As with my agency, most crop insurance agencies and or staff are available on a near 24/7 basis. Thus, the ability for a farmer to garner services beyond FSA's office hours gains my vote and support for RMA to be the lead for ACRSI (if that is an idea or process being considered).

5. I am hesitant to support the automated reporting from the producer's precision GPS monitoring equipment or farm management system whether it is with RMA, FSA, or other USDA agency. While I have seen RMA's requirements for use of said data in the payment of claims or reporting of production, both the guidelines I have read and the use of precision ag systems by farmers lack one HUGE factor...certification that user/operator is qualified and trained to operate the equipment. I have seen too many yield maps and planting reports that are inaccurate, because not all operators of the combine or planter have the same ability to operate the technology within the cab or the software on a computer. I believe the use of precision ag technology for USDA reporting requirements will be appropriate at some point in the future, but at this date its use is premature. I feel there are other issues to improve efficiencies that are more important to focus and expend energy and resources on. Let's direct our efforts on helping the 90% of policy holders that will not readily adapt to the use of automated reporting for years to come, rather than the 10% who might use it now (my estimates).

6. I am in full support of the standardizing of crop codes, practices, intentions, dates, and deadlines between FSA and RMA. I find little reason, at least in the Midwest, that our nomenclature does not match, and in many cases, this causes confusion and misinterpretation when applying information from reported data to an FSA or NRCS program vs an RMA program. Please note, I realize other USDA and government agencies also use acreage data, and said differences from RMA rules I am aware of would apply to those entities as well.

7. Personally, I feel the comments about ACRSI left on usda.gov/open are FSA biased and do not properly address the issues of this topic. This isn't or shouldn't be a "fight" for which agency should be the point of acreage and crop reporting. It is about eliminating redundancy and improving efficiency...doing what is best for farmers. Technology that may not have existed in the recent past will help improve efficiency.

8. I am in support of the concept of a "one stop" reporting location for the farmer/producer/insured when possible. For reporting via crop insurance, this is especially true if the producer insures all acres of cropland within the FSA farm # he/she operates. It is unfortunate, but some of my clients have indicated they do not find the level of the service they receive at FSA to be satisfactory...especially when it does not correlate with the RMA rules and regulations. Thus, for example, if his/her crop insurance agent is able to properly assist the producer in reporting acreage info one time, then efficiencies are automatically obtained. This, however, does not address workload and IT issues to obtain said efficiencies. For example, while FSA may benefit from reduced workload when a producer reports elsewhere, what is being expended by others during this process?

9. While I assume each AIP will (need to) expend IT resources to incorporate said ACRSI in order to transmit acreage data in a new standardized format, I am not privy to whether an AIP will transmit directly to a centralized data base, or whether it is done by RMA after an AIP transmits to them. My concern is the duplication of efforts by all AIPs (as well as the duplication of efforts by any USDA agency). What I feel is needed is the development of a web based application that any authorized individual or entity can access, be it the producer or the entity the producer chooses to report to. I am told, in theory, that anyone would be able to transmit an XML file to the centralized data base to comply with the ACRSI, but is "anyone" qualified to do so, simply because they have the technology? I believe "anyone" should be required to complete a competency test before being allowed to transmit data that ultimately ends up on a shared data base. Should "anyone" be only those associated with a USDA program, assuming they would have a better understanding of the current program rules? Will the same (RMA) Conflict of Interest, Non Disclosure, and Privacy statements apply to "anyone"?

10. I do agree that the need to report to both FSA and RMA is redundant. I believe technology (outside the tractor/combine cab) has advanced enough to make the ACRSI possible. New programming languages, faster and more sophisticated hardware, improved Internet access, as well as limited funds available to continue the past redundancies within USDA or any organization all lead to my support of the ACRSI. Allow "one-stop" reporting, but don't limit a farmer's option to where that location should be.

Sincerely,

Greg Wheelock, owner/agent  
Crop Insurance Services (An equal opportunity provider)  
1230 South Victory Drive, Mankato, MN 56001-5308