

For: State and County Offices

Accurate and Timely Crop Acreage Reporting

Approved by: Deputy Administrator, Farm Programs



1 Overview

A Background

To be eligible for FSA program benefits, FSA-578 is required to be filed by the final reporting dates according to 2-CP. If FSA-578 is late-filed for a program, a late-filed fee must be charged according to 2-CP, paragraph 21. It is important that acreage information is reported accurately and timely to prevent the loss of benefits.

Producers should be informed of the requirement for reporting all cropland and/or noncropland for the applicable programs, and the requirement to timely file FSA-578 for reporting crop acreage.

B Purpose

This notice:

- provides guidance on the importance of filing an accurate and timely FSA-578 for all crops and land uses
- emphasize the need to publicize crop reporting requirements and final reporting dates according to 2-CP
- information on the availability and use of FSA-578 status reports
- provides a summary of questions and answers (Exhibit 1) conveyed during the training on the importance of filing a timely and accurate FSA-578 held March 24, 2011.

Disposal Date

November 1, 2011
5-5-11

Distribution

State Offices; State Offices relay to County Offices

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2 Crop Acreage Reporting Requirements

A Crop Acreage Reporting Reminder

State and County Offices are reminded that crop reporting requirements and final reporting dates in 2-CP are applicable for crop year 2011. County Offices shall continue to accept FSA-578's from producers who want to file a report by the final crop reporting date. Use of appointments is encouraged. Registers shall be used if required according to 1-CM, paragraphs 2 and 3, and 2-CP, subparagraph 18 D.

B Program Benefits and Acreage Reporting Requirements

The following provides a list of program benefits and requirements for acreage reporting. This list is **not** all inclusive. Timely and accurate FSA-578's are required for all past, current, and future program participation. Refer to specific programs for policies and criteria for reporting acreage.

Benefit	Acreage Reporting Requirement	Reason for Requirement
MAL's and LDP's	All cropland on the farm. Note: Farms that have zero cropland will have the flag set to "Y" in the cropland comparison file. No producer or County Office action will be necessary.	<ul style="list-style-type: none"> • Authorized by the Food, Conservation, and Energy Act of 2008. • Needed to determine reasonableness of claimed production.
Direct and counter-cyclical payments under DCP	All cropland on the farm. Note: Farms that have zero cropland will have the flag set to "Y" in the cropland comparison file. No producer or County Office action will be necessary.	
CRP annual rental payment	CRP acreage according to CRP-1 Appendix. See 2-CRP for policy on completing CRP-817U for certification.	Needed to determine that the producer has maintained CRP acreage.
NAP	Crop acreage for which NAP benefits maybe requested.	<ul style="list-style-type: none"> • Needed to determine if acreage is eligible when calculating a loss. • Needed to determine eligible acreage for approved yield calculation.
TAP	Crop type, trees/acres in stand and share.	<ul style="list-style-type: none"> • Authorized by the Food, Conservation, and Energy Act of 2008. • Needed to establish eligibility of crop and producer for TAP benefits.

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2 Crop Acreage Reporting Requirements (Continued)

B Program Benefits and Acreage Reporting Requirements (Continued)

Benefit	Acreage Reporting Requirement	Reason for Requirement
SURE	<p>All crops, in all counties.</p> <p>Note: This includes crops on cropland and/or noncropland, including native or improved grass that will be hayed or grazed.</p>	<ul style="list-style-type: none"> • Authorized by the Food, Conservation, and Energy Act of 2008. • To determine if a crop is insurable or eligible for NAP. • To assist in risk management purchase requirement (RMPR) determinations, including deminimis. • To establish initial and subsequent crops planted which is used to determine SURE eligibility. • Need to establish eligibility of the crop and producer for SURE benefits.
ACRE	<p>Crop acreage for which ACRE benefits may be requested.</p> <p>Note: Emphases must be placed on accurate reporting of irrigated/nonirrigated status, intended use of the crop, and share of the crop.</p>	<ul style="list-style-type: none"> • Authorized by the Food, Conservation, and Energy Act of 2008. • Need to establish eligibility of the crop and producer for ACRE benefits.
LFP	<p>Crop acreage for which LFP benefits may be requested.</p> <p>Note: This includes crops on cropland and/or noncropland, different types or varieties of pasture and grazing crops, including improved pasture with a nonirrigated permanent vegetative cover, nonirrigated native pasture with a permanent vegetative cover, nonirrigated small grain crops planted specifically for the purpose of providing grazing for covered livestock, and nonirrigated forage sorghum crops planted specifically for the purpose of providing grazing for covered livestock.</p>	<ul style="list-style-type: none"> • Authorized by the Food, Conservation, and Energy Act of 2008. • Need to establish eligibility of the crop and producer for LFP benefits.
ELAP	<p>All crops on all farms in which the producer has an interest for the relevant program year.</p>	<ul style="list-style-type: none"> • Authorized by the Food, Conservation, and Energy Act of 2008. • To assist in RMPR determinations. • To establish eligibility of the crop and producer for ELAP benefits.

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2 Crop Acreage Reporting Requirements (Continued)

C Publicizing Crop Reporting Dates and Requirements

State and County Offices shall notify all producers of acreage reporting requirements by any possible means of communication according to 2-CP, paragraph 16.

D Late-Filed FSA-578's

Late-filed fees will continue to apply for FSA-578's filed after the final crop reporting dates according to 2-CP, paragraph 21.

3 FSA-578 Status Reports

A Available Status Report

The following is a list of available FSA-578 status reports. Status reports are a management tool that allows County Offices to identify FSA-578 data discrepancies.

- Farms with unreported cropland *
- Farms with uncertified crops *
- Farms with no FSA-578 *
- Farms with incomplete determined acres *
- Farms with reported acres on noncropland *
- Farms with DCP contract and unreported cropland *
- Farms with invalid crops and /or invalid crop attributes **
- Farms with prevented acres *
- Farms with End Date ***
- Crops with End Date ***
- Farms with ACRE contract and unreported cropland ***

* Available in the System 36 and the Crop Acreage Reporting System (CARS).

** Available in System 36 **only**.

*** Available in CARS **only**.

B Accessing and Generating Status Report

FSA-578 status reports shall be accessed and generated according to 2-CP, paragraph 296 for System 36 and paragraph 318 for CARS.

4 Updating Customer Records in SCIMS and Farm Records

A SCIMS Changes

Properly entering and updating records in SCIMS is **crucial** for acreage reporting. When customer data is **not** entered or updated correctly, CARS data is adversely affected. See Notice CM-671 for more information on correctly updating SCIMS.

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4 Updating Customer Records in SCIMS and Farm Records (Continued)

B Farm Records Changes

Properly entering and updating farm records data is **crucial** for acreage reporting. When farm records data is **not** entered or updated correctly, CARS data is adversely affected. See Notice CM-671 for more information on correctly updating farm records.

All farm reconstitutions must be completed before loading FSA-578 information for a farm in a specified crop year. When applicable, any pre-existing FSA-578 in CARS that will be reconstituted must be deleted before the reconstitution is initiated.

5 State and County Office Action

A State Office Action

State Offices shall ensure:

- County Office employees are immediately informed of the contents in this notice
- acreage reporting requirements and deadlines are adequately publicized by any possible means of communication according to 2-CP, paragraph 16.

B County Office Action

County Offices shall:

- follow procedure in this notice for 2011 crop acreage reporting
- notify all producers of acreage reporting requirements by any possible means of communication according to 2-CP, paragraph 16, taking into consideration current budget restraints
- generate FSA-578 status reports on a regular basis throughout the crop reporting season
- correct all data discrepancies identified on the FSA-578 status report(s) before rollover of FSA-578 acreage reporting software
- use appointments and registers if required according to 1-CM.

Note: A copy of the registers shall remain on file for future reference.

Timely and Accurate Acreage Reporting Questions and Answers

The following is a summary of questions and answers conveyed during the training on the importance of filing a timely and accurate FSA-578 held March 24, 2011.

- Q1** Do producers have to report timber on FSA-578?
- A1** Producers are required to report all cropland and/or noncropland for applicable program benefits. Refer to applicable program for policies and criteria for reporting acreage.
- Q2** If FSA-578 is not mailed out, the producer will not report. How do counties handle these?
- A2** The National Office does not support mailing FSA-578's (ie. Budget, PII etc.). It is the producer's responsibility to provide a FSA-578 report of acreage/certification to the County Office.
- Q3** CRP-817U for CRP certification is being mailed out. How do counties handle these? It appears/appeared that it is possible to use CRP-817U for CRP acreage reporting instead of FSA-578 if the producer is only certification for CRP. Is this correct?
- A3** CRP-817U may be used instead of FSA-578 for certification of CRP according to 2-CRP, paragraph 602. Refer to 2-CRP for policy on completing CRP-817U.
- Q4** How can counties find total acreage of a certain crop reported by county?
- A4** FSA is hoping to have the Crop Acreage Data Warehouse (CADW) back up and running soon. Until such time, counties shall use available reports in the Comprehensive Information Management System (CIMS) as needed. Additional reports may become available through future enhancements of CARS.
- Q5** For NAP purposes, are producers required to sign the producer print and FSA-578?
- A5** Yes, according to 2-CP.
- Q6** According to 2-CP, subparagraph 24 M referencing prevented planting, there seems to be issues about appeals because of the producer's land continuously being under water. Will this be addressed?
- A6** Through discussions with RMA, FSA has determined that our policies are aligned with RMA's. There are some cases, where it is believed that approved insurance providers (AIP's) should not have paid on prevented planting. RMA is reviewing those cases for merit. FSA will continue to communicate with RMA to coordinate on other policy related issues, such as depleted aquifers, the occurrence of the disaster events for determining eligible prevented planting, etc.

Timely and Accurate Acreage Reporting Questions and Answers (Continued)

- Q7** According to 2-CP, subparagraph 24 A, the last bullet about insufficient moisture and under the note, the first bullet reads, “Prolonged precipitation deficiencies exceed the D2, D3, or D4 level as determined using the U.S. Drought Monitor”. RMA does not use the drought monitor as the sole determining factor when determining prevented planted acreage because of insufficient moisture. RMA uses a combination of sources to determine lack of moisture. RMA, if conditions warrant, may approve prevented planted requests if there is verifiable information collected from sources whose business is to record weather conditions. This puts FSA in a no win situation. Can FSA be consistent with RMA rules on this issue?
- A7** The U.S. Drought Monitor (exceeding D2, D3, or D4) will no longer be used exclusively to verify drought condition, however, information provided by the U.S. Drought Monitor shall be considered when making prevented planted determinations. This policy was included in 2-CP, Amendment 67.
- Q8** Is it possible to get rid of GRP on the Compliance Validation System (CVS) and just report the individual grass types?
- A8** No. GRP will remain on CVS.
- Q9** For NAP purposes, 2-CP, Exhibit 6, subparagraph B provides that the final date for reporting any specific crop acreage for which NAP assistance may be paid is the earlier of the established acreage reporting date in this exhibit or 15 calendar days before the onset of harvest or grazing of the specific crop acreage being reported. However, the note in subparagraph B states that if the crop has NAP coverage, the crop must be reported 15 calendar days before the onset of harvest. If the crop does not have NAP coverage, the acreage reporting date would be the date listed in this exhibit. This is very confusing and contradictory. This needs to be clarified. The bottom bullet allows a producer without NAP coverage to report NAP crops until July 15 in some States. If the producer has NAP coverage, the producer must report the earlier of the crop reporting date or 15 calendar days before onset of harvest or grazing. In my opinion producers with or without NAP coverage should have the same reporting date. Can this policy be clarified?
- A9** This is being addressed with acreage/crop reporting streamlining initiative (ACRSI) acreage reporting dates (ARD’s). Clarification shall be forthcoming.
- Q10** Can counties have an approved double crop for forages?
- A10** Yes.

Timely and Accurate Acreage Reporting Questions and Answers (Continued)

- Q11** What is the definition of maturity now that 2-CP, Amendment 65 has been released and removes the reference to grain and lint when approving double cropped combinations?
- A11** See 2-CP, Amendment 67, paragraph 25 for clarification on approving double-cropping combinations. Approved double-cropping is based solely on the viability of the 2 specific crops being grown for the intended use on the same acreage during the same crop year. As long as both crops can be carried to maturity for the intended use as reported by the producer on the same acreage within a crop year under normal growing conditions, then that crop combination may be considered an acceptable double crop combination.
- Q12** Will 2-CP, subparagraph 16 A be updated?
- A12** Yes, a revision to 2-CP is forthcoming and will include an update to subparagraph 16 A.
- Q13** If FSA's COC determination on prevented planting conflicts with RMA, does FSA's determination still stand?
- A13** Yes. Policy requires that COC make no determination on a prevented planting request if a request is already under review by RMA, however, FSA prevented planted determinations shall be based on policies outlined in 2-CP, paragraph 24. In some cases FSA determinations will conflict with RMA determinations.
- Q14** Does every producer need to sign both an FSA-578 certification and FSA-578 producer print? 1-NAP provides if producers have only 1 farm number, producers do not need to sign a producer print?
- A14** Producers wishing to participate in any FSA program must sign/date FSA-578. Additionally, for NAP purposes, FSA-578 (Producer Print) is available. If FSA-578 (Producer Print) is required according to 1-NAP, then FSA-578 (Producer Print) must be signed and dated.