

## ASCRI Comments Attachment to Question 8

One comment was received indicating the collection of commodity, acreage and production information from producers should not be conducted annually nor should such information be collected more frequently than every 3 years because of the costs involved in the collection and distribution of the information.

Response: One of the goals of the Acreage/Crop Reporting Streamlining Initiative (ACRSI) is to reduce the reporting burden on producers by reducing the number of times a producer has to report the same information to different USDA agencies. By eliminating or reducing the need for a producer to report the same information to multiple USDA agencies, and allowing that information to be shared between agencies, the cost and time spent by each agency can also be reduced. With regard to the annual reporting of such information, many USDA benefits tied to the information being collected are based on the actions and performance of the producer in a particular year. The information needed to determine the eligibility of a producer for such program benefits is needed on an annual basis to ensure the benefits are earned and to prevent fraud, waste and abuse of tax payer money.

A couple of commenters questioned how errors in the data reported will be handled.

Response: The Notice of request for comments is regarding the revision of the currently approved paperwork package associated with the ACRSI. ACRSI is an initiative regarding the processes, procedures and standards for certain information collection from producers participating in certain USDA programs. The Notice does not address the procedures and processes regarding the modification of the data reported.

A couple of commenters questioned how the producer reported data will be shared between the appropriate USDA agencies.

Response: In this Phase of the pilot, the common information collected by either the FSA Service Center or the RMA insurance agent will be made available to the other agency via existing systems. For this Phase, the producer will still have to make contact with the other agency to verify the shared information, but will not have to report their common data a second time. When fully implemented these duplicative burdens will be further reduced, the extent to which will be determined by lessons learned from this and subsequent Phases, and customer feedback.

A couple of commenters stated they do not see any less workload for USDA agencies or crop insurance agents because the producer will still have to meet with the agency and their crop insurance agent.

Response: In this Phase of the pilot, the common information collected by either the FSA Service Center or the RMA insurance agent will be made available to the other agency via existing systems. For this Phase, the producer will still have to make contact with the other agency to verify the shared information, but will not have to report their common data a second time. When fully implemented these duplicative burdens will be further reduced, the extent to which will be determined by lessons learned from this and subsequent Phases, and customer feedback.

A couple of commenters questioned whether the amount of time an insurance provider is given to submit crop and acreage data to the Risk Management Agency is impacted by the ACRSI.

Response: ACRSI is an initiative regarding the processes, procedures and standards for certain information collection from producers participating in certain USDA programs. The Notice does not address the procedures and processes regarding the transmission of data between insurance providers and the Risk Management Agency.

A couple of commenters questioned which USDA agency is responsible for the timely reporting of crop and acreage data.

Response: ACRSI is an initiative regarding the processes, procedures and standards for certain information collection from producers participating in certain USDA programs. The Notice does not address any acreage or production reporting dates established. It is the producer's responsibility to submit timely and accurate reports according to existing policies and procedures of the applicable agency.

A couple of commenters questioned whether crop insurance agents will be responsible for accepting and reporting crops for which Federal crop insurance is not available.

Response: Producers are responsible for submitting timely and accurate reports according to existing policies and procedures. AIPs and agents who choose to participate in the Pilot will be made aware of the additional, uninsured crops included in the Pilot, and will be responsible for accepting and reporting the acreage information for those crops as they do for insured crops.

A couple of commenters questioned whether crop insurance agents would be additionally compensated for accepting a producer's crop acreage report that includes crops that are not insurable.

Response: ACRSI is an initiative regarding the processes, procedures and standards for certain information collection from producers participating in certain USDA programs. The Notice does not address how crop insurance agents are compensated.