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General Comment

To the Federal Crop Insurance Corporation:

I appreciate the opportunity to comment on the proposed extension of the information collection associated with Subpart U ineligibility tracking under the Federal Crop Insurance Act. My comments address questions (1) practical utility and (3) enhancing the quality and utility of the information collected.

I am an independent researcher whose work, currently under review at Nature Communications Sustainability and Nature Food and available as a preprint, quantifies the economic consequences of climate-driven agricultural migration in the United States. Using a county-level machine learning model trained on 638,000 observations across 2,902 counties from 1950 to 2024, I have identified 473 counties currently exhibiting four or more empirical signals of agricultural cascade — declining yields, accelerating farm consolidation, rural population outflow, and farmland devaluation relative to soil-quality fundamentals.

This research is relevant to the FCIC ineligibility tracking system because the same climate-driven yield declines that drive cascade dynamics also drive systematic increases in delinquent debt among producers in affected counties. As crop insurance indemnities fail to keep pace with structural yield declines (a separate issue I document elsewhere), producers in cascade counties face elevated risk of falling into the delinquent-debt category that triggers Subpart U ineligibility determinations. The current information collection treats each ineligibility determination as an individual administrative event. It does not capture the geographic clustering of new ineligibility determinations, which my research suggests is a leading indicator of structural agricultural distress at the county level.

I respectfully recommend that FCIC consider two enhancements to the information collection during the OMB renewal process:

First, capture geographic metadata at the determination level. The current Ineligible Tracking System records the identity of ineligible persons and the basis for ineligibility, but the public-facing summary statistics do not aggregate by county or commodity. Adding county-level aggregation to the information collection — without changing what insurance providers report — would allow FCIC and external researchers to identify geographic clusters of new ineligibility determinations as they emerge. This would impose minimal additional burden on the 13 reinsured insurance companies, since they already report the underlying data, and would substantially enhance the practical utility of the collection for early warning purposes.

Second, retain temporal patterns in ineligibility determinations. Currently, when a person regains eligibility, they are removed from the active tracking system. Retaining anonymized historical records of past ineligibility events — including the duration of ineligibility and the basis for it — would allow FCIC to identify whether climate-vulnerable counties show systematically longer ineligibility durations or higher rates of recurrent ineligibility. This information would have direct utility for FCIC's mission of program integrity and would support the Risk Management Agency's broader risk-rating function without creating new collection burdens.

These enhancements would convert the Subpart U information collection from a purely administrative compliance tool into a dataset with meaningful early-warning value for the agricultural risk management community. The 473 counties I have identified through independent research would benefit from FCIC-side detection because the information collection is already happening — what is missing is the analytical framework to extract structural distress signals from determinations that are currently treated only as individual compliance events.

I would be glad to share the underlying research with FCIC staff or to discuss the methodology in further detail. Thank you for considering these comments and for the opportunity to participate in the public comment process.

Respectfully submitted,

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