

August 23, 2021

Richard Flournoy
Acting Manager, Federal Crop Insurance Corporation
6501 Beacon Drive
Kansas City, MO 64133-4675

Dear Acting Manager Flournoy,

On behalf of the AGree Economic and Environmental Risk Coalition, we thank you for the opportunity to provide input on the U.S. Department of Agriculture's (USDA) Acreage Crop Reporting Streamlining Initiative (ACRSI). Enhancing the collection and quality of agricultural data while reducing reporting burdens for producers are critical steps to modernizing USDA's ability to collect, share, and utilize accurate data to achieve its programmatic goals. We applaud USDA's effort to improve agricultural data collection and utilization through ACRSI.

Additional improvements can be made to USDA's data collection methodologies to reduce reporting burdens on producers, continue modernizing USDA's data infrastructure, and create trust and mutual benefits for both USDA and producers. We recommend USDA do the following to enhance the quality, utility, and clarity of data that it collects.

- **Expand the ACRSI program to include other datasets collected by multiple USDA agencies:** USDA should minimize duplicative data collection by identifying data points collected by multiple USDA agencies beyond producer name, customer/tax ID, state, county, commodity name, commodity type or variety, intended use, date planted, planted acreage, and land location. For example, adding the option to voluntarily report tillage, cover cropping, and other conservation practices as part of Farm Service Agency (FSA) and Risk Management Agency (RMA) acreage reporting would be important to include. More consistent, annual data collection on the adoption of conservation practices on working lands is critical to future research to understand how these practices can help build farm resilience and mitigate climate change.
- **Standardize data formats across agencies:** ACRSI must continue to standardize data formats across agencies (e.g., by aligning common land unit (CLU) acreage tolerance between FSA and RMA) to increase interoperability and reduce reporting burdens on producers. These changes will help advance a system that allows producers to enter information into forms once and use it for reporting across multiple USDA agencies and programs.
- **Expand electronic reporting capacity through pilots and investment:** USDA should expand electronic reporting capacity for FSA and for USDA's statistical data collection efforts at the National Agricultural Statistics Service (NASS) through the use of pilots, such as the 2018 pilot in Nebraska that allowed external providers to submit required data from precision farm equipment and farm management information systems. More funding for increased software and staffing capacity would also help USDA agencies to expand their electronic reporting capacity.
- **Ensure producers can access reported data:** Ensure that producers can retrieve their historical information back from USDA agencies and systems to utilize for their own operations and decision making. This will help producers maintain electronic farm records and build incentives for accurate data reporting.

- **Adopt geospatial technologies to reduce the need for producer-provided data:** USDA agencies should implement satellite imagery, application maps, yield maps, and other geospatial imagery sources such as drones and manned aircraft to collect data related to crop acreage, yields, commodity type, land location, and biomass. Utilizing these technologies can reduce reporting burdens on farmers, while improving data accuracy, saving money, and increasing collection efficiency for USDA agencies. As the use of satellite data and remote sensing expands, farmers and ranchers should be engaged to explore the implications of increased remote sensing, how producers can benefit, and how to leverage subsequent reductions in reporting burdens.
- **Prioritize equity in designing data systems:** New data systems should be designed to work for and collect information from all types of producers and sizes of agricultural operations, including historically underserved producers and agricultural enterprises. This is essential to ensure that all agricultural producers and all types of agriculture can benefit from modernized USDA systems and programs.
- **Strengthen USDA data security and protect producer data:** USDA needs to proactively strengthen the security of data systems to defend producer-reported data from potential breaches, hacks, and unauthorized releases.

In summary, expanding the ACRSI program to include other datasets and continuing to modernize USDA's data infrastructure can help to improve the collection and quality of agricultural data collected by the Agency. The ACRSI program is a critical component of modernizing USDA's data infrastructure, alongside other ongoing efforts such as expanding rural broadband access. These recommendations are supported by the members of the AGree Economic and Environmental Risk Coalition, which includes researchers, academics, producers, former officers of USDA, and NGO leadership, who stand ready to lend support to USDA as implementation partners.

We appreciate your leadership in improving the USDA's data systems and look forward to continued innovation from the ACRSI.

Sincerely,

The AGree Economic and Environmental Risk Coalition