



United States
Department of
Agriculture

Farm and Foreign
Agricultural
Services

Risk
Management
Agency

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INFORMATIONAL MEMORANDUM NO.: IS-11-011

TO: All Approved Insurance Providers
All Risk Management Agency Field Offices
All Other Interested Parties

FROM: Michael A. Alston /s/ *Michael A. Alston* 9-12-2011
Deputy Administrator for Insurance Services

SUBJECT: Claims Advisory – American Upland (AUP) and Extra Long Staple (ELS)
Cotton Planting Patterns in West Texas

BACKGROUND:

The Risk Management Agency's (RMA) Oklahoma City Regional Office (RO) was contacted by Approved Insurance Providers (AIP) as acreage reports were being filed regarding new planting patterns used by AUP and ELS cotton growers principally in west Texas with irrigation systems. The Oklahoma City RO received calls from AIPs after crop insurance agents began receiving different acreage determinations from Farm Service Agency (FSA) county offices on acres planted to the same planting pattern with a narrow skip (referred to as a "30/50" planting pattern). The "30/50" planting pattern resulted from growers planting cotton seed closer to the irrigation source. Questions were raised as to whether RMA would consider this new pattern a solid plant or skip row planting pattern and what effect on insurance guarantees might result.

The Cotton Crop Provisions (11-0021), Section 1. Definitions, defines "Skip-row" as:

"A planting pattern that:

- (1) Consists of alternating rows of cotton and fallow land or land planted to another crop the previous fall; and*
- (2) Qualifies as a skip-row planting pattern as defined by the Farm Service Agency (FSA) or a successor agency."*

ACTION:

On July 15, 2011, the FSA National Office notified the Texas State FSA Office it had approved a request for an exception to the existing program requirements regarding FSA acreage determinations on the 40 inch maximum row width criteria as it affected the "30/50" planting pattern on irrigated cotton beginning with the 2011 crop year. On August 8, 2011, FSA's National Office further notified the Texas State FSA Office that it had approved the same exception for the "30/50" planting pattern for non-irrigated cotton.



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These exceptions result in the “30/50” planting pattern being considered a solid planting pattern. FSA determined that since the decision was made after the final 2011 FSA acreage certification date, producers would not be required to recertify acres planted to cotton. The RMA acreage reporting date for cotton in west Texas was July 15, 2011.

There may be situations where producers have reported their 2011 cotton acreage planted under the “30/50” planting pattern differently to RMA and FSA for the 2011 crop year. Since FSA has clarified their position that the “30/50” crop planting pattern is a solid planting pattern, acreage report revisions may now be required. AIPs are authorized to revise all affected acreage reports accordingly.

If you have any additional questions, please contact the Oklahoma City Regional Office at (405) 879-2700.

DISPOSAL DATE:

December 31, 2011