

United States Department of Agriculture March 16, 2011

**INFORMATIONAL MEMORANDUM: PM-11-013** 

Farm and Foreign Agricultural Services

**TO:** All Approved Insurance Providers

All Risk Management Agency Field Offices

All Other Interested Parties

Risk Management Agency

**FROM:** Tim B. Witt /s/Tim B. Witt

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**SUBJECT:** Guidelines for Quality Adjustment for the Tobacco Program

## **BACKGROUND**

The Tobacco Crop Provisions provide for quality adjustment based on the average value of the damaged tobacco, as compared to the price election provided by RMA. This average value is determined by averaging the price per pound received by the producer for all mature tobacco production from the unit. When the Approved Insurance Provider (AIP) determines the value received for the harvested tobacco is not reasonable, the AIP retains the right to determine the reasonable market value of the damaged tobacco production. RMA is aware there are currently no universal standards being used to determine reasonable market values by tobacco grade. This has resulted in some difficulties determining production that should be adjusted for quality, as well as the consistency of quality adjustment performed in the loss adjustment process.

In accordance with Section 12(f) of the Tobacco Crop Provisions, mature harvested tobacco may be adjusted for quality deficiencies when production has been damaged by insurable causes. The 2011 Loss Adjustment Standards Handbook (Tobacco LASH) Section 3G(5) provides guidance for determining the reasonable value of damaged tobacco production. Under Section 3G(5)(d) of the Tobacco LASH, the AIP may obtain tobacco grades for the damaged production from the Agricultural Marketing Service (AMS) to help determine the extent of damage to the tobacco.

Questions have arisen regarding appropriate determinations for valuing damaged tobacco once a grade has been assigned by AMS.



## **ACTION**

RMA is providing guidance for the 2011 crop year to assist AIPs in establishing reasonable values for damaged tobacco production based on tobacco grading in accordance with AMS Tobacco Standards for Individual Type as defined in 7 CFR part 29. Utilizing third party marketing data, RMA has categorized all AMS grades for burley and flue-cured tobacco by historical market prices. Each category has a recommended value, as defined by a percentage reduction of the RMA price election. The assignments of grades to categories, and the associated recommended value for the production of that grade, are contained in Attachment 1.

AIPs are reminded to follow the procedures contained in the Tobacco Crop Provisions and Tobacco LASH when adjusting damaged tobacco for the purposes of quality adjustment, and AMS grading should only be used when all other criteria for quality adjustment have been met. It remains the responsibility of the policy holder to demonstrate the extent of their crop loss and that the damage was due to an insured cause of loss.

**DISPOSAL DATE:** December 31, 2011

Factor Category 1		
Recommended Value equals Price Election		
Burley	Flue Cured	
X1L <sup>°</sup>	B1L	
X2L	B2L	
X3L	B3L	
X1F	B1F	
X2F	B2F	
X3F	B3F	
X4F	B1FR	
C1L	B2FR	
C2L	B3FR	
C3L	B3K	
C1F	H3F	
C2F	H4F	
C3F	H4FR	
C4F	C1L	
B1F	C2L	
B2F	C3L	
B3F	C1F	
B1FR	C2F	
B2FR	C3F	
B3FR	X1L	
B4FR	X2L	
B1R	X3L	
B2R	X1F	
B3R	X2F	
B4R	X3F	
T3F	P2L *1	
T4F	P3L *1	
T3FR	P2F *1	
T4FR	P3F *1	
T3R	NOG-F *2	
T4R		

Factor	Cotogowy 2
	Category 2 lue equals Price Election
	Flue Cured
Burley X4L	B4L
X4L X5L	B5L
X5F	B4F
X4M	B5F
C4L	B4FR
C5L	B5FR
C5F	B4K
C3M	B5K
C4M	B3KR
C5M	B4KR
C3V	B5KR
C4V	B3V
C5V	B4V
B4F	B3KL
B5F	B4KL
B5FR	B3KF
B5R	B4KF
B2M	B3KM
B3M	B4KM
B4M	B5KM
B5M	H5F
B3VF	H5FR
B4VF	H4K
B3VR	H5K
B4VR	C4L
T5F	C5L
T5FR	C4F
T5R	C5F
M3F	C4KR
M4F	C4V
M5F	C4KL
M3FR	C4KF
M4FR	C4KM
M5FR	X4L
WICH IX	X5L
	X4F
	X5F
	X3KR
	X4KR
	X3V
	X4V
	X3KM
	X4KM
	P4L *1
	P4F *1
	M4F
	M4F M5F
	M4KR
	M4KM
	M5KM

	G	
Factor Category 3		
Recommended Value is 80% of Price		
Election		
Burley	Flue Cured	
X5M	B6K	
B4D	B5V	
B5D	H6K	
B5VF	C4S	
B5VR	C4KL	
T4D	C4KF	
T4VF	X4KL	
T4VR	X4KF	
T5VR	P5L *1	
	P5F *1	
Factor Category 4		
Factor	Category 4	
	· Category 4 Value is 60% of Price	
Recommended '		
Recommended '	Value is 60% of Price	
Recommended E	Value is 60% of Price Election	
Recommended E Burley	Value is 60% of Price Election Flue Cured	
Recommended E Burley C3K	Value is 60% of Price Election Flue Cured B5KL	
Recommended E Burley C3K C4K	Value is 60% of Price Election Flue Cured B5KL B5KF	
Recommended S  Burley C3K C4K B3K	Value is 60% of Price Election Flue Cured B5KL B5KF B4KV	
Recommended S  Burley C3K C4K B3K B4K	Value is 60% of Price Election Flue Cured B5KL B5KF B4KV B4G	
Recommended S Burley C3K C4K B3K B4K B3GF	Value is 60% of Price Election Flue Cured B5KL B5KF B4KV B4G C4GK	
Recommended S  Burley C3K C4K B3K B4K B3GF B3GR	Value is 60% of Price Election Flue Cured B5KL B5KF B4KV B4G C4GK X4KV	
Recommended S  Burley C3K C4K B3K B4K B3GF B3GR T5D	Value is 60% of Price Election  Flue Cured  B5KL  B5KF  B4KV  B4G  C4GK  X4KV  X4G	

Factor Category 5		
Recommended Value is 40% of Price		
Election		
Burley	Flue Cured	
X4G	B5KV	
X5G	B4GK	
C5K	C4G	
C4G	X4GK	
C5G	M4GK	
B5K	M5GK	
B4GF		
B5GF		
B4GR		
B5GR		
T5K		
T4GF		
T5GF		
T5GR		
M4G		
M5G		
M4K		
M5K		

Factor Category 6		
Recommended Value is 20% of Price		
Election		
Burley	Flue Cured	
N1L	B6KF	
N1F	B6KV	
N1R	B5G	
N1G	B5GK	
	M5GK	
	P4G *1	
	P5G *1	
	N1R	
	N1BO	
	N1XO	
	N1L *1	
	N1XL	
	N1K	
	N1KV	

Factor Category 7 Recommended Zero Value if Destroyed		
Burley	Flue Cured	
N2L	N1GL *1	
N2R	N1GF	
N2G	N1GG	
NO-G	N1GR	
S - Scrap	N2	
	NO-G	
	S - Scrap	

- \*1 Includes production with the Sand descriptor
- \*2 NOG-F denotes excessive foreign matter and production of this grade should not be adjusted for quality

Note: U (unsound), W (doubtful keeping order), or wet are special descriptors that may be added to any grade and may indicate an atypical value