

TO:

United States Department of Agriculture

INFORMATIONAL MEMORANDUM: COM-15-003

Farm and Foreign Agricultural Services

All Approved Insurance Providers

All Risk Management Agency Field Offices

All Other Interested Parties

Risk Management Agency

FROM: Heather Manzano

/s/ Heather Manzano

10/26/2015

1400 Independence Avenue, SW Stop 0801 Washington, DC 20250-0801 Deputy Administrator for Compliance

SUBJECT: Livestock Feeding Records

BACKGROUND:

The Risk Management Agency (RMA) is required annually, in accordance with Appendix C of the Office of Management and Budget (OMB) Circular No. A-123. Requirements for Effective Estimation and Remediation of Improper Payments dated October 20, 2014, to estimate and report an improper payment rate for the Federal crop insurance program. RMA recently completed its field review of policies for the 2015 reporting period and is currently reviewing policies for the 2016 reporting period.

In the recent improper payment review sample, RMA identified policies with errors that resulted from insureds not maintaining proper livestock feeding records. Policy reviews for other case work also found that a large number of producers who fed production to livestock did not meet the requirements for acceptable feeding records set forth by the Crop Insurance Handbook (CIH). Section 3, paragraph 1434 of the 2016 CIH, states "AIPs should encourage insureds who feed all or a portion of the harvested production to have the total amount of production determined by the AIP prior to beginning feeding. Contemporaneous livestock feeding records will not be required if all production is determined by the AIP prior to insured beginning to feed production."

ACTION:

Approved Insurance Providers (AIPs) and their agents should remind insureds if they plan to feed all or a portion of their production to either maintain acceptable feeding records or request the AIP to determine the total amount of production prior to beginning feeding. Accurate production reporting will help maintain the integrity of the crop insurance program and reduce the program's overall improper payment rate.

DISPOSAL DATE:

December 31, 2016

NAU Country Insurance Company 7333 Sunwood Drive, Ramsey, MN 55303 Phone: 763.427.3770 • Toll Free: 800.942.6557 • Fax: 763.427.6473 naucountry.com

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Memorandum

To:

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From:

Mark Mossman

Date:

November 3, 2015

Subject:

Livestock Feeding Records

Attached is a copy of the recently released Informational Memorandum: COM-15-003, which was release by RMA and forwarded by QBE NAU to all last week. I would like to take a moment to add some commentary around what we are doing at this time and more importantly, how QBE NAU will be handling in the future.

The bulletin is providing guidance to AIPs and their agents, instructing to have an adjuster determine the production for grain that will used to feed livestock. Currently, a NOL is being submitted to notify QBE NAU of this service request. These requests are not claims, but rather a livestock feeding record request. Please continue to do this or work with your local personnel for alternate notification processes that may exist.

Moving forward, we will be addressing a systematical solution, which will assist in the notification process. Our thoughts are to isolate these requests into an off- shoot of the existing process for tracking purposes. Please watch for an announcement upon completion of this project.

Thank you for allowing us the opportunity to include this service to those growers whom are in need of this.

Livestock Feeding APH Process

