



# Wildfires and Hurricanes Indemnity Program – Puerto Rico

## Audit Report 03702-0003-31

We evaluated FSA's administration and oversight of WHIP in Puerto Rico.

### OBJECTIVE

Our objective was to evaluate FSA's administration and oversight of the 2017 WHIP in Puerto Rico.

### REVIEWED

We interviewed FSA officials and reviewed: (1) applicable laws, regulations, notices, handbooks, and procedures; (2) the prices FSA established; (3) the methodology FSA used to calculate WHIP payments in Puerto Rico; and (4) FSA's internal controls.

### RECOMMENDS

We recommend FSA strengthen controls; establish policy; conduct training; assess the actual production value for all questioned insured production losses Office of Inspector General (OIG) identified and, based on the assessment, recover any disallowed costs from the producers and issue payments to the producers for any underpayments; and, when designing future disaster relief programs, ensure handbook procedures include a requirement that program documents related to current State committee members must be reviewed by a State or national office employee.

### WHAT OIG FOUND

The 2017 Wildfires and Hurricanes Indemnity Program (WHIP) is a Farm Service Agency (FSA) program that provided payments to eligible producers to offset losses from hurricanes and wildfires. FSA issued more than \$193 million in WHIP payments in Puerto Rico.

We found that all 37 prices FSA established in Puerto Rico for tree, bush, and vine losses were inaccurate, not adequately supported, or both. As a result, FSA issued more than \$157 million in questioned payments for tree, bush, and vine losses in Puerto Rico. Additionally, FSA Puerto Rico officials did not use the correct actual production value when calculating WHIP payment amounts for producers who had insured production losses, which resulted in more than \$15.6 million in questioned costs and FSA having reduced assurance that the net payments for all insured production losses paid for 1,521 producer applications in Puerto Rico were accurate.

Finally, we found that an FSA county committee member approved a State committee member's WHIP application without oversight from personnel at the State office or national office level. Without independent review, there is increased risk or perception that county-level officials could feel pressure to act favorably on State committee members' applications.

FSA concurred with our findings and recommendations, and we accepted management decision for four of the five recommendations.





## OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



**DATE:** March 24, 2023

**AUDIT**

**NUMBER:** 03702-0003-31

**TO:** Zach Ducheneaux  
Administrator  
Farm Service Agency

**ATTN:** Gary Weishaar  
Branch Chief, External Audits and Investigations  
Farm Production and Conservation Business Center

**FROM:** Steve Rickrode  
Acting Assistant Inspector General for Audit

**SUBJECT:** Wildfires and Hurricanes Indemnity Program – Puerto Rico

This report presents the results of the subject review. Your written response to the official draft is included in its entirety at the end of the report. We have incorporated excerpts from your response, and the Office of Inspector General's (OIG) position, into the relevant sections of the report. Based on your written response, we are accepting management decision for recommendations 1, 2, 3, and 5. However, we are unable to reach management decision on recommendation 4. The information needed to reach management decision on this recommendation is set forth in the OIG Position section following recommendation 4. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer (OCFO).

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of each management decision to prevent being listed in the Department's annual Agency Financial Report. For agencies other than OCFO, please follow your internal agency procedures in forwarding final action correspondence to OCFO.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions. This report contains publicly available information and will be posted in its entirety to our website (<https://usdaoig.oversight.gov>) in the near future.



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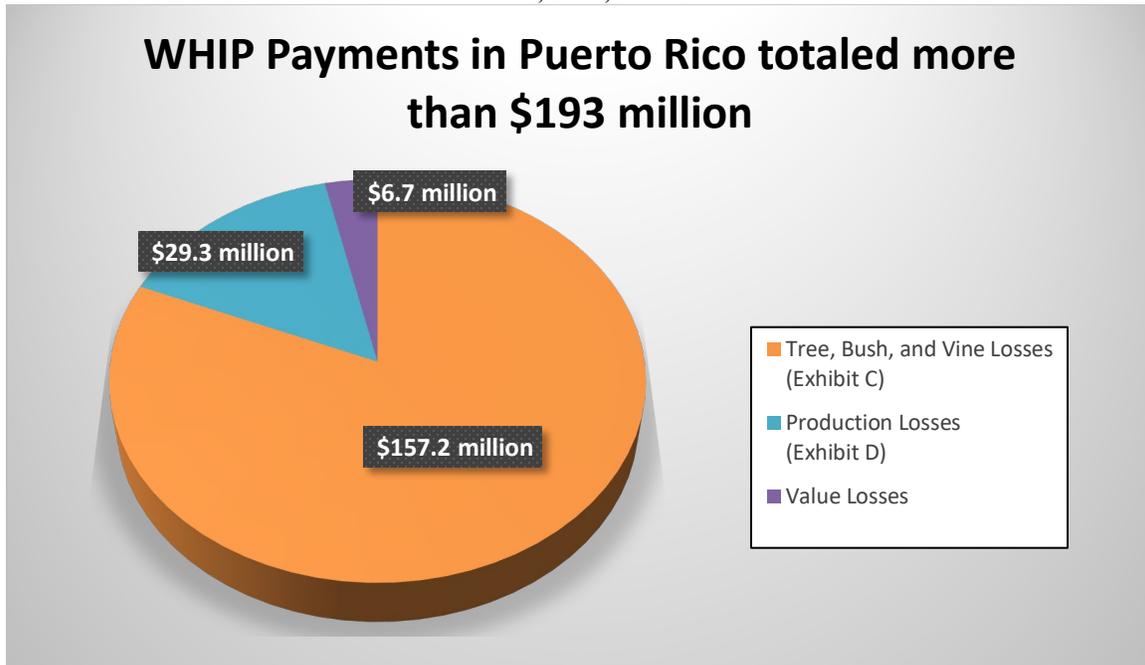
## Background and Objectives

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### Background

The United States Department of Agriculture’s (USDA) Farm Service Agency (FSA) administers the delivery of farm loan, commodity, conservation, disaster assistance, and related programs. One such program, the 2017 Wildfires and Hurricanes Indemnity Program (WHIP), provided payments to eligible producers to offset losses from hurricanes and wildfires that occurred in the 2017 calendar year.<sup>1</sup> The Bipartisan Budget Act of 2018 made \$2.36 billion available for disaster assistance for necessary expenses related to crop, tree, bush, and vine losses related to hurricanes and wildfires that occurred in calendar year 2017, such as Hurricanes Irma and Maria. Of the \$2.36 billion, the Secretary directed FSA to provide nearly \$2 billion in assistance to eligible producers through WHIP.<sup>2</sup> FSA issued more than \$193 million in WHIP payments in Puerto Rico as shown in Figure 1 below.

**Figure 1: Total WHIP Payments in Puerto Rico. Figure by Office of Inspector General (OIG) Based on October 1, 2019, FSA Data.**



Like its other programs, FSA delivered WHIP through 50 State offices and in Puerto Rico.<sup>3</sup> While Puerto Rico is a United States Territory, FSA refers to it as a State office. Puerto Rico also has another distinct difference in its administration of farm programs. USDA’s Risk Management Agency (RMA) manages the Federal Crop Insurance Corporation in the United

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<sup>1</sup> FSA documentation refers to this program as “WHIP” and “2017 WHIP.” In this report, we will refer to it as “WHIP.”

<sup>2</sup> *2017 Wildfires and Hurricanes Indemnity Program*, 83 Fed. Reg. 33,795 (July 18, 2018).

<sup>3</sup> According to FSA data as of October 1, 2019, 11 States (Alabama, California, Florida, Georgia, Kansas, Louisiana, Mississippi, North Carolina, South Carolina, Texas, and Washington) and 2 Territories (Puerto Rico and Virgin Islands) received WHIP payments.

States and in Puerto Rico. In Puerto Rico, the Government of Puerto Rico Agricultural Insurance Corporation (CSA) provides crop insurance through the local Department of Agriculture.<sup>4, 5</sup>

FSA administered WHIP at three different levels: national, State, and county.<sup>6</sup> At the national office level, the Deputy Administrator for Farm Programs supervised implementation, which included overseeing how State and county committees ran the program. Executive directors at the State and county level also helped implement WHIP. State committees are selected by the Secretary and are responsible for carrying out FSA's farm programs within delegated authorities. State committee members ultimately directed the administration of WHIP within their State and ensured that State and county offices follow WHIP provisions.

WHIP issued payments to producers for three different loss types.

1. Tree, bush, and vine loss: FSA established that 37 types of perennial trees, bushes, and vines in Puerto Rico were eligible for WHIP.<sup>7</sup> See Exhibit C for a list of the types. Payments for tree, bush, and vine losses were based on Federal crop insurance principles and the "stage" of the plant (i.e., the age and production capacity of a tree, bush, or vine). Typically, trees, bushes, and vines with longer development cycles were split into three stages: (1) newly planted or reset, non-producing plants; (2) established plants that were not yet fully producing; and (3) fully mature plants that were producing a yield typical of healthy plants of a similar age. The tree, bush, or vine's growth stage, the amount of damage suffered, and the required rehabilitation determine the value lost.
2. Production loss: FSA established that 41 crops in Puerto Rico were eligible for WHIP.<sup>8</sup> See Exhibit D for a list of the crops. Payments for production losses took into consideration the difference between the expected value of the crop and the actual value of the damaged crop. Payments for production losses were calculated based on total planted acreage of the crop for the unit.
3. Value loss: FSA identified crops where the entire plant or commodity is sold, such as mushrooms, flowers, or fish. Payments for value loss crops were based on inventory and losses before and after the qualifying disaster event.

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<sup>4</sup> The Puerto Rico Agricultural Insurance Corporation is named *Corporación Seguros Agrícolas de Puerto Rico* in the Spanish language and is commonly abbreviated CSA.

<sup>5</sup> The Puerto Rico law known as the "Puerto Rico Agricultural Insurance Act" (Law No. 12 of Dec. 12, 1966) created the Puerto Rico Agricultural Insurance Corporation, which is a component of the Puerto Rico Department of Agriculture.

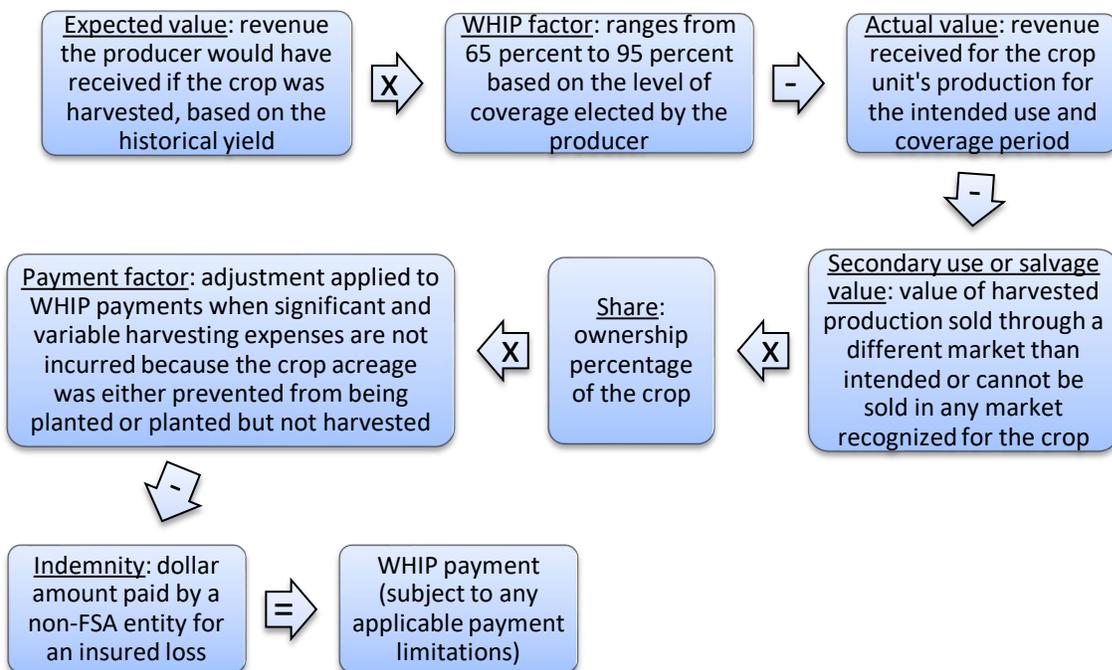
<sup>6</sup> Puerto Rico organizes its Territory as municipalities rather than counties; however, because FSA uses the term "county office," this report refers to the FSA Puerto Rico offices as county offices.

<sup>7</sup> USDA FSA, *2017 Wildfire and Hurricane Indemnity Program (WHIP) Tree Stage Data for Puerto Rico*, PR (Puerto Rico) Notice WHIP-2 (Nov. 21, 2018).

<sup>8</sup> USDA FSA, *Establishing 2017 Wildfire and Hurricane Indemnity Program (WHIP) Crop Data*, PR Notice WHIP-1 (July 15, 2018).

Each WHIP payment calculation had a specific method to get to WHIP’s loss calculation. The components of this calculation are as follows.

**Figure 2: Components of WHIP Payment Calculations**



The formulas for calculating expected value and actual value for the three loss types are as follows.

**Table 1: Calculations of WHIP Values by Loss Type**

Loss Type	Expected Value Calculation	Actual Value Calculation
<b>Tree, Bush, and Vine Loss</b>	Number of trees, bushes, and vines damaged or destroyed × price	Expected Value - ((Number of trees, bushes, and vines destroyed × price) + (Number of trees, bushes, and vines damaged × partial damage factor <sup>9</sup> × price))
<b>Production Loss</b>	Acres × price × yield × guarantee adjustment factor	Price × actual production
<b>Value Loss</b>	Dollar value of the crop immediately before the eligible disaster event	Dollar value of inventory immediately after the eligible disaster event + ineligible cause of loss

This report represents the culmination of work started as part of Audit 03702-0002-31, *Wildfires and Hurricanes Indemnity Program* (report released September 2020). Due to the impacts of the coronavirus disease 2019 (COVID-19) pandemic, we were not able to complete our on-site work

<sup>9</sup> Partial damage factor is a percentage of the value lost when a tree, bush, or vine is damaged and requires rehabilitation but is not completely destroyed.

in Puerto Rico and finished our audit work remotely.<sup>10</sup> Therefore, this report includes our review of WHIP Puerto Rico as well as general issues that pertain to the whole program nationwide.

## **Objectives**

Our objective was to evaluate the Farm Service Agency's administration and oversight of the 2017 Wildfire and Hurricanes Indemnity Program in Puerto Rico.

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<sup>10</sup> As part of our previous audit work, we originally non-statistically selected three FSA States and Territories based on the greatest amount of payments: Florida, Georgia, and Puerto Rico. We completed audit work in Florida and Georgia and included results in our initial report, Audit Report 03702-0002-31, *Wildfires and Hurricanes Indemnity Program*, released September 2020, and recommended FSA strengthen program guidance and controls.

## Finding 1: FSA Needs to Improve How It Sets Prices for Trees, Bushes, and Vines

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Among other crops, WHIP provided assistance for losses suffered to perennial plants that produce commercial crops annually, such as coffee trees and passion fruit vines. However, we found that all 37 prices FSA established in Puerto Rico for tree, bush, and vine losses were either inaccurate, not adequately supported, or both. This occurred because FSA did not establish adequate controls over the development and approval of tree, bush, and vine prices. As a result, FSA issued more than \$157 million<sup>11</sup> in questioned payments to 2,065 producers for tree, bush, and vine losses in Puerto Rico.

According to “1-WHIP,” an FSA handbook, WHIP pricing should account for the cost of: (1) the tree as a new sapling; (2) installation labor for the sapling; (3) additional watering, fertilizer, and other agricultural practices to develop the tree, bush, or vine to the stage at which it was lost, above what the lost tree would have required had it not been damaged or destroyed; and (4) removal of a destroyed tree, bush, or vine of a similar stage.<sup>12</sup> State committees are responsible to establish tree, bush, and vine prices in a manner similar to crop insurance pricing. Specifically, State committees are to use crop insurance prices and factors, if available, and consult with reliable sources, such as local universities, for trees, bushes, and vines not subject to crop insurance. State committee-approved tree stage data, including tree stage, partial damage factor, and prices, as well as supporting documentation, must be submitted to the Deputy Administrator for Farm Programs.<sup>13</sup>

We reviewed the tree, bush, and vine prices for Puerto Rico as well as the supporting documentation. We noted that FSA’s price setting process included RMA crop insurance pricing data, and data obtained from university sources.<sup>14</sup> However, our analysis of both the crop insurance and university sources disclosed that the data used for setting tree, bush, and vine prices in Puerto Rico did not always follow 1-WHIP. Further, in other instances, FSA averaged certain prices inconsistently and incorrectly. Thus, all 37 tree, bush, and vine prices were affected by one or more of the following issues. Exhibit C presents a summary of these issues, by type of tree, bush, and vine.

- *Prices Inflated by Costs Not Allowed in WHIP:* We identified that 33 of the prices set for trees, bushes, or vines included additional costs that increased the prices FSA paid. For example, 14 of the prices included total maintenance costs, when 1-WHIP only allows for additional maintenance costs, i.e., costs above what a lost tree would have required had it not been damaged or destroyed (see Exhibit C for the listing of the affected trees, bushes, and vines). Including the total maintenance costs rather than just the additional portion inflated the pricing. In 19 other instances, prices were inflated not just by total maintenance costs, but also by the value of production lost for that year plus 5 to 10

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<sup>11</sup> As of October 1, 2019, FSA paid \$157,212,092 for tree, bush, and vine losses in Puerto Rico to 2,065 producers.

<sup>12</sup> USDA FSA, *Wildfires and Hurricanes Indemnity Program*, (1-WHIP), Amendment 7, subparagraph 141C (Sept. 9, 2019). Hereafter referred to as “1-WHIP.”

<sup>13</sup> Ibid.

<sup>14</sup> RMA is another agency within USDA and is responsible for establishing crop insurance policy requirements.

additional years (see Exhibit C for the listing of the affected trees, bushes, and vines). The 1-WHIP handbook did not allow any of these costs.

- *Prices Based on Unrepresentative Crop Information:* We identified that averages of the inflated prices described above were used to set the prices for three additional types of trees, bushes, and vines, even though the prices of the trees, bushes, and vines were not related to the three types. For example, FSA used coffee and orange prices in the averages to calculate prices for jack fruit, lanson/langstat, and sapodilla. We also noted that the crop insurance pricing data for a fourth tree, coffee, included only Hawaii data that does not represent all coffee in Puerto Rico. The Hawaii policy pricing data factored in prices for Kona variety coffee that is priced higher than other varieties of coffee and is not grown in Puerto Rico. The Hawaii policy pricing data also factored in codes for “organic, certified” coffee, which may be priced higher for crop insurance than the codes for non-organic coffee. According to State office personnel, organic coffee is not grown in Puerto Rico. Further, the crop insurance pricing data for Hawaiian coffee contained components covering loss of income, which would further inflate the price and are not allowed for in 1-WHIP.
- *Prices Affected by Inaccurate Averaging:* We identified that with three of the prices, FSA calculated the tree stage prices inconsistently and incorrectly. In these averages, FSA used only unique values (using a price once even if it appears in the data multiple times) to determine certain prices, but not others, and also made a typographical error that caused the software to not recognize a number when calculating the average.
- *Prices Deflated Due to Exclusion of Authorized Costs:* We identified that 19 prices excluded a cost that decreased the prices FSA paid (see Exhibit C for the listing of the affected trees, bushes, and vines). Specifically, these prices did not include the cost to remove the destroyed tree, bush, or vine, even though 1-WHIP states it should be included.
- *Price Included Unsupported Costs:* We identified that 1 price (grapes, which only consisted of 2 stages) included a Stage 3 price that exceeded what the data supported (see Exhibit C for the listing of the affected trees, bushes, and vines).<sup>15</sup> We did not identify any additional maintenance costs from 1 year to the next to support the more than 47-percent increase from the Stage 2 price.<sup>16</sup> FSA was unable to explain how it calculated the Stage 3 price.

As a result of these issues, the WHIP payments FSA made in Puerto Rico for 37 types of trees, bushes, and vines were not accurate and supported. These issues skewed WHIP payments for these crops, often in multiple different ways. The impact can be illustrated through comparison

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<sup>15</sup> FSA established grape vines with two stages since 1-WHIP allows trees, bushes, and vines with shorter development cycles to be categorized using two stages. These stages represent newly planted or reset, non-bearing plants; or fully mature plants that are producing a yield typical of healthy plants of a similar age. FSA categorized grape vine stages as Stage 2 and Stage 3. Stage 3 vines are fully mature plants that were producing a yield typical of healthy plants of a similar age.

<sup>16</sup> Stage 2 vines are newly planted or reset, non-bearing plants.

of what a producer would usually expect from growing the crop and what FSA paid for a WHIP disaster payment. For example, coffee was the tree, bush, or vine crop for which FSA calculated the greatest gross dollar value WHIP payments in Puerto Rico. Using FSA's expected yields, we calculated that if hurricane damage had not occurred, the expected annual revenue a producer could receive from growing a type of coffee from 1 acre of coffee trees would be less than \$699.<sup>17</sup> However, the potential WHIP payment for 1 acre of fully destroyed Stage 3 coffee trees would be more than \$29,653.<sup>18</sup> Therefore, in this example, a producer would have received more than 42 times the amount per acre for destroyed coffee trees from WHIP than the producer would have expected from the trees' 2017 production. WHIP was designed to assist producers in removing dead tree stumps, replacing with new trees, and providing additional costs in limited circumstances. It was not a lifetime revenue replacement program.

We noted that FSA had two key internal controls in place for development and approval of WHIP tree, bush, and vine prices. However, these controls were not sufficient to ensure FSA could establish tree, bush, and vine prices that were adequately supported and/or accurately included costs allowed for in established guidance. First, the State committee was required to review and approve various data elements required for WHIP including tree, bush, and vine damage prices by stage. Second, State-committee-approved tree stage data (such as tree age, price, and damage factor) were required to be submitted to the Deputy Administrator for Farm Programs via email along with the State memo and supporting documentation. Despite these reviews, FSA approved tree, bush, and vine prices that used cost components in their methodologies that did not comply with 1-WHIP guidance. According to FSA, the Deputy Administrator for Farm Programs review was only a review for consistency between States, and we concluded this was not an in-depth review to see if the prices complied with what is allowed in 1-WHIP. We also concluded the State committee did not perform an in-depth review, based on our conversations with the State committee and because, as our policy review validated, 1-WHIP does not specify what the State committee review should entail. We determined that if FSA had expanded its review beyond attempting to assure consistency between States, it could have identified the issues we identified. Moreover, FSA could improve the accuracy of prices used to reimburse tree, bush, and vine producers.

When we asked FSA about these pricing issues, FSA officials stated that they spent a significant amount of time in consultation with RMA officials to understand how RMA determines tree stages and develops prices for crop insurance policies. However, we determined FSA misinterpreted what the RMA crop insurance policy pricing represented. An FSA national official stated they intended to mimic RMA pricing as much as possible. Yet, FSA's 1-WHIP also stated it allowed only additional costs (costs above what a lost tree would have required). However, FSA used RMA data (which included total costs) in FSA's pricing. Due to FSA's misinterpretation and subsequent pricing issues noted, we determined that FSA's controls over its pricing process could be improved. When FSA uses data from any outside entity to develop

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<sup>17</sup> That is, based on FSA acreage data, a coffee producer in Puerto Rico would have expected \$698.99 per acre from the 2017 coffee crop. Using the 2017 National Crop Table, OIG calculated the revenue as follows: County Expected Yield of 3.17 hundredweight per acre  $\times$  price of \$220.50 per hundredweight.

<sup>18</sup> Based on USDA FSA, *Establishing 2017 Wildfire and Hurricane Indemnity Program (WHIP) Crop Data*, PR Notice WHIP-1, Exhibit 2 (July 15, 2018), OIG calculated the payment as follows: 1,030 trees per acre  $\times$  price per tree of \$28.79.

program guidance, FSA should coordinate with the outside entity to ensure that the data provided are accurate and being used in accordance with their intended purpose.

Ultimately, all 37 tree, bush, and vine prices in Puerto Rico did not follow the guidance established in 1-WHIP. Due to the pervasiveness of the issues with determining the prices used to calculate payments, we question the accuracy of more than \$157 million in tree, bush, and vine net payments in Puerto Rico.<sup>19</sup> Improving FSA's controls over the development and approval of tree, bush, and vine prices would help ensure producers receive accurate payments as they recover and rebuild their farming operations from the damage caused by hurricanes and wildfires. By strengthening the controls over the development and approval of tree, bush, and vine prices, we believe FSA will be more effective in overseeing and administering WHIP and any similar future disaster relief programs.

## **Recommendation 1**

Strengthen controls over the development and approval of tree, bush, and vine prices, and expand current review to include verification of the sufficiency and accuracy of supporting information.

### **Agency Response**

FSA concurs with this recommendation. FSA acknowledges that strengthened controls in the development and approval process for tree, bush, and vine prices would improve program integrity. Currently FSA policy for 2020 and 2021 tree, bush, and vine losses have not been finalized; however, if a pricing mechanism is used similar to WHIP, FSA will expand its review beyond attempting to assure consistency between States and include verification of the sufficiency and accuracy of supporting information. Once policy is finalized, procedures and guidance will be updated in Handbook 3-ERP which will strengthen controls no later than October 31, 2023.

### **OIG Position**

We accept management decision for this recommendation.

## **Recommendation 2**

Establish a policy that, when using information or data from any outside entity, FSA will conduct an accuracy and applicability review with the outside entity to ensure that the information or data provided is being used in accordance with its intended purpose and with FSA regulations and policies.

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<sup>19</sup> The total of the tree, bush, and vine loss net payments in Puerto Rico according to FSA's payment data is \$157,212,092 as of October 1, 2019.

## **Agency Response**

FSA concurs with this recommendation. FSA will develop a Standard Operating Procedure when outside sources or information are used for programmatic decisions. The Standard Operating Procedure will require coordination with outside data source/entities to ensure that the information or data provided is being used in accordance with its intended purpose and with FSA regulations and policies. The agency will update current and future programmatic handbooks that rely on external data resources by September 30, 2023.

## **OIG Position**

We accept management decision for this recommendation.

## Finding 2: Actual Production Calculation Methodology Did Not Follow WHIP Guidance

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We found that FSA Puerto Rico officials did not use the correct actual production<sup>20</sup> when calculating WHIP payment amounts for producers who had insured production losses. This occurred because the Puerto Rico State office developed and implemented a deviation from the established methodology to determine the amount of actual production without obtaining the required approval from the FSA National office. Since FSA used the unapproved formula for all insured production losses in Puerto Rico, FSA has reduced assurance that the net payments for all insured production losses paid for 1,521 producer applications in Puerto Rico were accurate. Gross payment calculations for insured production losses totaled more than \$15.6 million.<sup>21</sup>

According to 1-WHIP, WHIP payments are based, in part, on the producer's production. Specifically, production loss payments are made to producers based on numerous components including the expected value of a crop, calculated actual value of the crop produced, producer's share of the crop, indemnity, salvage value, and other factors (see Background Figure 2). A key factor in determining the actual value of the crop is the actual production. 1-WHIP requires officials to select the higher of two options—the producer's certification or the county disaster yield (CDY).<sup>22</sup> 1-WHIP also states that provisions of the handbook are not to be revised without prior written approval from the FSA National office.<sup>23</sup>

Our review of WHIP payments in Puerto Rico identified that the Puerto Rico State office developed and implemented its own methodology to determine the actual production, which deviated from the established guidance.<sup>24</sup> We found that FSA Puerto Rico officials developed a calculation using factors that were not allowed in the guidance, such as the ratio of the actual production to the amount the production was insured for minus the producer's deductible multiplied by the county expected yield multiplied by the acres. This deviation results in using a different actual production number, which will inversely affect the overall WHIP payment calculation—a lower production number will result in a higher WHIP payment and a higher production number will result in a lower WHIP payment if all other factors remain the same.

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<sup>20</sup> Actual production is the total amount of harvested and appraised production by unit (1-WHIP subparagraph 110B).

<sup>21</sup> The more than \$29.3 million paid for production losses in Puerto Rico included producers who had production that was insured, uninsured, or had Noninsured Crop Disaster Assistance Program coverage. The \$15.6 million is the total amount calculated for insured production losses prior to any adjustments made before payments were issued, such as adjustments for payment limitations. Due to the payment limitations not being accounted for in the data FSA provided, OIG could not determine a precise, aggregated net payment total.

<sup>22</sup> 1-WHIP requires producers to submit verifiable or reliable production records to substantiate production to the county committee. The county committee assigns production based on the higher value of either the producer's certification or the CDY. The only time the CDY is used is if there are no verifiable or reliable production records available. FSA establishes CDYs for each crop, crop type, intended use, practice, and planting period to reflect the average impact the eligible disaster(s) had on crops in the county.

<sup>23</sup> 1-WHIP subparagraph 3F.

<sup>24</sup> FSA used the Government of Puerto Rico Agricultural Insurance Corporation (CSA) documents to create the following formula to calculate actual production: *(dollar value based on CSA value of the crop left standing, harvested, or lost due to causes not covered by insurance ÷ dollar value of discounted portion of total insured value from CSA (dependent on producer deductible) × county expected yield × acres = actual production)*.

We reached out to a Puerto Rico FSA State official regarding the decision to use this formula. The official said they received approval, but were unable to demonstrate they received prior written approval as required. The State official stated that the actual production formula was established to determine the percentage of production and that the decision to use such methodology to calculate actual production was because CSA producer data was not available electronically and could not be downloaded or provided directly to FSA with the amount of production for the insured crop.<sup>25</sup> However, we noted that producers provided this information to FSA on their CSA documents. While the documents might not have been available to download electronically, the agency nonetheless used the producer-provided, self-certification, CSA documents to obtain components for the formula.

When we asked about the formula used in Puerto Rico, officials representing the FSA national office stated that it did not approve a deviation from procedure to allow the Puerto Rico offices to use the formula to calculate the actual production. An FSA National official indicated that the Puerto Rico personnel informed the national office that the CSA loss adjuster worksheets (which are part of the producer-provided CSA documents) were not always accurate. An FSA National official also stated that when comparing the final appraisal to the initial appraisal there were discrepancies, so using a loss claim to determine the appraisal's accuracy was not uncommon. However, despite the potential concerns with these documents, we noted FSA staff in Puerto Rico still used them to calculate a different number for actual production.

FSA staff in Puerto Rico applied the unapproved formula to determine the actual production for all 1,521 producer applications that had insured production loss. FSA provided data that showed the total production losses paid in Puerto Rico; however, due to the data structure, we are not able to determine the total net payments for insured production losses. We requested FSA's assistance to determine the amount of affected production loss payments. FSA staff ran reports in the system it used to administer WHIP, which showed the total gross calculated amount of insured production loss payments for Puerto Rico was more than \$15.6 million.<sup>26</sup> However, the actual amount of paid insured production losses could not be determined from the reports provided by FSA because payment limitations are not accounted for in this data. As a result, FSA has reduced assurance that the payments for insured production losses were accurate. We determined these payments could be recalculated to improve accuracy and adherence to 1-WHIP, as the actual production number should be included in the producer's files. FSA needs to conduct reviews of the actual production used in the payment calculations for the 1,521 producer applications and correct the inaccurate WHIP payments as applicable.

The 1-WHIP handbook recognized that provisions may need revision, but it required any provisions to be approved in writing in advance. Since the Puerto Rico FSA officials proceeded without documented prior approval from the national office, we determined FSA should develop training that clarifies how FSA personnel should request and receive approval for deviations from established policy and procedures.

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<sup>25</sup> CSA is independent of FSA and there is no requirement that it make its records electronically accessible to Puerto Rico FSA officials.

<sup>26</sup> According to FSA analysis, the total gross calculated amount of insured production loss payments affected by the unauthorized calculation used by Puerto Rico was \$15,681,325.

### **Recommendation 3**

Conduct specific training that demonstrates how FSA should request and receive approval for practices that deviate from established policies and procedures.

#### **Agency Response**

FSA concurs with this recommendation. Handbook 1-CM will be amended to include language associated to deviating from National Office policy. Additionally, during the March National Office conference call with State Offices, the Safety Net Division will provide training on this updated provision to be shared with their county office. This action will be completed no later than May 30, 2023.

#### **OIG Position**

We accept management decision for this recommendation.

### **Recommendation 4**

Based on established guidance, assess the actual production value for all questioned insured production losses totaling \$15,681,325 identified by OIG. Recover any disallowed costs from the producers and issue payments to the producers for any underpayments.

#### **Agency Response**

FSA concurs with intent of this recommendation. No action will be taken to recover overpayments given statute limitations [sic]. Specifically, the finality rule applies and prohibits FSA from pursuing overpayments when an error is determined more than 90 days from the date the application and all supporting documentation is filed. Since applications for WHIP were finalized and filed in 2018, no actions will be taken to recover any over payments. However, action will be taken for underpayments. FSA will complete a phased approach by evaluating the Puerto Rico policy deviation used for determining production for calculating loss. Based on that evaluation, if necessary, FSA will take the next step in identifying errors, determining applicable under payments and issuing those payments. This action will be completed no later than January 30, 2024.

#### **OIG Position**

We are unable to reach management decision for this recommendation. As required by USDA Departmental Regulation Number 1720-001, in order to reach management decision, FSA needs to provide us evidence of the final determination made for each of the payments in order to support its conclusion of the applicability of the finality rule. Specifically, FSA needs to provide: (1) the dollar amounts FSA determined as inaccurate, (2) bills for collection for amounts owed and evidence that the identified overpayments

have been entered as a receivable on the agency's accounting records, and (3) support that the equivalent action has been performed for the underpayments.

## **Finding 3: State Committee Member Disaster Relief Applications Need a Higher Level of Review**

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We found that an FSA county committee member approved a State committee member's WHIP application without oversight from personnel at the State office or National office level. The State committee member's subordinate was able to approve the application because there were no internal control provisions in 1-WHIP requiring State committee members' applications be independently reviewed or approved by another State or National level employee. Without independent review, there is increased risk that State committee members could attempt to exert undue influence on county level officials in order to enhance the State committee members' program benefits and do so without their activities ever being detected.

Departmental Regulation and Office of Management and Budget guidance requires Federal managers to maintain systems of internal control.<sup>27</sup> Specifically, Office of Management and Budget Circular A-123 states that to “the extent that Federal managers can effectively mitigate and prevent fraud from occurring, it can save time and resources spent in investigating and prosecuting fraud, and recovering lost money.”<sup>28</sup> Further, the Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government* state that management should design appropriate control activities for an entity's internal control system.<sup>29</sup> These standards identify segregation of duties, which includes separating the responsibilities for authorizing transactions and reviewing them, so that no one individual controls all key aspects of the transaction. Segregation of duties in the internal control system helps prevent fraud, waste, and abuse and can address the risk of management circumventing existing control activities through management override.

Our review of 1-WHIP procedures identified a weakness in FSA's segregation of duty requirements that FSA commonly addresses in other programs. Specifically, we noted that State committee member WHIP applications were not subject to independent or higher level reviews. A national office official informed us that the handbook requires that the applications of State office employees, county committee members, county executive directors, county office employees, and their spouses go to the State committee, or their designee, for approval.<sup>30</sup> However, WHIP policy did not include State committee members in this procedure. We identified that a county level official had approved the WHIP application of a State committee member, who has oversight responsibility over county and State program operations.

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<sup>27</sup> USDA Departmental Regulation Number 1110-002, *Management's Responsibility for Internal Control*, June 17, 2013, required that national office officials will “establish, maintain, evaluate, improve, and report on systems of controls. These systems should constitute the full range of controls necessary to assist managers in attaining program objectives and protecting and using Government resources efficiently and effectively.” The current version of the Regulation further clarifies that national office officials will “[e]stablish and maintain a system of internal control based on GAO's [*Standards for Internal Control in the Federal Government*] ensuring adequate controls for program and administrative operations, reporting, and compliance are in place”. USDA Departmental Regulation Number 1110-002, *Management's Responsibility for Internal Control*, March 5, 2021.

<sup>28</sup> Office of Management and Budget, *Management's Responsibility for Enterprise Risk Management and Internal Control*, Circular A-123 (July 15, 2016).

<sup>29</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, ¶10.03 (Sept. 2014).

<sup>30</sup> 1-WHIP subparagraph 4A.

When we asked national office officials about this, they concluded that based on 1-WHIP policy, a county committee member could approve a State committee member's WHIP application. We noted that this is unlike other FSA programs—such as the Emergency Conservation Program<sup>31</sup> and the Dairy Margin Coverage Program<sup>32</sup>—that require Deputy Administrator for Farm Programs and/or the State Executive Director to approve State committee members' applications.

Without independent review, there is the potential that one of the more than 220 State committee members nationwide could intentionally or unintentionally exert influence over county level officials in regards to their own applications. When implementing future disaster relief programs, FSA would be well served by ensuring that handbook procedures include a requirement that program documents, including applications, related to current State committee members be reviewed or approved by a State or national office level employee, which should provide an internal control that may prevent, detect, or deter potential fraudulent activities by senior program managers.

## **Recommendation 5**

When designing future disaster relief programs, ensure that handbook procedures include a requirement that a State- or national-level employee must review or approve program documents, including applications, related to current State committee members.

### **Agency Response**

FSA concurs with this recommendation. FSA previously identified this missing internal control in WHIP policy and has since incorporated the requirement of proper higher level approval authority for FSA employees and State and county committee participants within the following:

- Subparagraph 4A of Handbook 1-Quality Loss Assistance,
- Subparagraph 4 A of Handbooks 1 and 3 Emergency Relief Program covering Phase 1 and Phase 2 of 2020 and 2021 disaster assistance.

Additionally, during the March National Office conference call with State Office, the Safety Net Division will provide training on this updated guidance to be shared with their county office. This action will be completed no later than April 1, 2023.

### **OIG Position**

We accept management decision for this recommendation.

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<sup>31</sup> FSA's Emergency Conservation Program, which helps farmers and ranchers repair damage to farmlands caused by natural disasters and put in place methods for water conservation during severe drought, establishes this requirement at USDA FSA, *Emergency Conservation Program*, 1-ECP, Revision 6, Amendment 1 (Apr. 22, 2021).

<sup>32</sup> FSA's Dairy Margin Coverage Program, which provides dairy operations with risk management coverage, establishes this requirement at USDA FSA, *Dairy Margin Coverage Program*, 1-DMC, Amendment 2 (June 9, 2020).

## Scope and Methodology

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We conducted an audit of FSA’s administration and oversight of 2017 WHIP in Puerto Rico. We performed fieldwork on this audit from October 2020<sup>33</sup> through November 2022 at the FSA national office in Washington, DC; at the FSA State office; and at three FSA county offices, as noted in Exhibit B.<sup>34</sup> This report represents the culmination of work started as part of the Audit 03702-0002-31 *Wildfires and Hurricanes Indemnity Program* (report released September 2020), which, due to the impacts of the COVID-19 pandemic, we were not able to complete our on-site work in Puerto Rico and finished our audit work remotely. Therefore, this report includes our review of WHIP Puerto Rico as well as general issues that pertain to the whole program nationwide.

Our review covered all WHIP payments in Puerto Rico issued from July 16, 2018, through October 1, 2019. As of October 1, 2019, Puerto Rico had issued a total of more than \$193 million in WHIP payments.<sup>35</sup> This scope includes more than 99.4 percent of total WHIP Puerto Rico funds paid as of October 4, 2022.<sup>36</sup>

To accomplish our objective, we:

- Reviewed applicable laws, regulations, notices, handbooks, and agency procedures pertaining to WHIP administration;
- Interviewed officials at the FSA national office in Washington, DC, as well as State and county officials in Puerto Rico to gain an understanding of how the agency administered WHIP;
- Reviewed the prices FSA established for trees, bushes, and vines;
- Reviewed the methodology FSA used in Puerto Rico to calculate payments;
- Reviewed FSA’s internal controls over WHIP; and
- Discussed the results of findings and potential recommendations with FSA officials.

We selected three counties for our review in Puerto Rico primarily based on the highest amount of payments issued, as well whether any FSA employees, county committee members, or their spouses received a WHIP payment within the county. We selected Mayaguez, Adjuntas, and Ponce as our three counties, which comprised a total of more than \$108 million in WHIP payments. From these counties, we selected a non-statistical sample of 59 producers’ WHIP application files for review. These producers received a total of \$23,466,983 in WHIP payments.

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<sup>33</sup> We conducted fieldwork for a prior audit from March 2019 to April 2020 for *Wildfires and Hurricanes Indemnity Program*, Audit Report 03702-0002-31, *Wildfires and Hurricanes Indemnity Program*, Sept. 2020. As part of our previous audit work, we originally non-statistically selected three FSA States and Territories based on the greatest amount of payments: Florida, Georgia, and Puerto Rico. We completed audit work in Florida and Georgia and included results in our initial report. We were unable to complete our planned work in Puerto Rico at that time because of the COVID-19 pandemic; as a result, this engagement was performed as a separate audit that began in October 2020.

<sup>34</sup> Puerto Rico organizes its Territory as municipalities rather than counties; however, because FSA uses the term “county office,” this report refers to the FSA Puerto Rico offices as county offices.

<sup>35</sup> The audit team selected our samples in Puerto Rico based on WHIP payment data as of October 1, 2019, which totaled \$193,317,942.

<sup>36</sup> As of October 4, 2022, FSA paid \$194,350,290 for WHIP payments in Puerto Rico.

However, we cannot rely on our sample reviews due to concerns about the integrity of program documentation and, therefore, will not be reporting on the accuracy of these payments.

During the course of our audit, we obtained data from the agency's Common Payment System and used it for selecting our non-statistical sample to review.<sup>37</sup> We assessed data reliability by: (1) comparing data regarding total amounts paid for 2017 WHIP with detailed payment records provided by FSA; (2) manually recalculating WHIP payments for each of our sampled producer files to verify the payment calculation function in the WHIP program software was accurate; (3) interviewing agency officials knowledgeable about the data; and (4) comparing the results of our observations to agency data that captured those results. We also verified whether the Common Payment System was properly tracking individuals' total WHIP payments received and not allowing anyone a payment above their respective payment limitations.<sup>38</sup> We performed this verification by: (1) reviewing the agency information system data to verify that no payments more than \$900,000 were issued; and (2) observing within our sampled files where payments were appropriately limited by the system. We did not identify any issues during this verification. However, we did not assess the overall reliability of any FSA information system to carry out WHIP activities, as we did not rely solely on its data to support the reported findings, conclusions, and recommendations. Evaluating the effectiveness of information systems or information technology controls was not part of the audit objective. We performed this verification by reviewing agency information system data.

We relied on the work of specialists from OIG's Office of Analytics and Innovation to analyze and rank WHIP payment data for the counties and producers from highest to lowest. We obtained documentation to ensure the specialists were qualified professionally, competent in the work we relied upon, and met independence standards.

We assessed internal controls to satisfy our audit objectives. Our assessment included internal control components and principles of the Standards for Internal Control in the Federal Government.<sup>39</sup> In particular, we assessed the following components and underlying principles:

<b>Component</b>	<b>Principle</b>
Control Activities	Management should implement control activities through policies.
Control Activities	Management should design control activities to achieve objectives and respond to risks.
Control Activities	Management should design the entity's information system and related control activities to achieve objectives and respond to risks.

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<sup>37</sup> FSA uses the Common Payment System to apply a standardized process for issuing program benefits and payments to participating producers.

<sup>38</sup> Each eligible producer that requested WHIP benefits was subject to a payment limitation of either \$125,000 (if less than 75 percent of their average adjusted gross income was derived from farming, ranching, or forestry) or \$900,000 (if at least 75 percent of their average adjusted gross income was derived from farming, ranching, or forestry).

<sup>39</sup> GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Sept. 2014).

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence we obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Abbreviations

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1-WHIP .....	USDA FSA, <i>Wildfires and Hurricanes Indemnity Program</i> , 1-WHIP, Amendment 7 (Sept. 9, 2019).
CDY .....	county disaster yield
COVID-19 .....	coronavirus disease 2019
CSA.....	Government of Puerto Rico Agricultural Insurance Corporation
FSA .....	Farm Service Agency
GAO.....	U.S. Government Accountability Office
OIG.....	Office of Inspector General
PR.....	Puerto Rico
RMA.....	Risk Management Agency
USDA .....	United States Department of Agriculture
WHIP.....	Wildfires and Hurricanes Indemnity Program

## Exhibit A: Summary of Monetary Results

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Exhibit A summarizes the monetary results for our audit report by finding and recommendation number.

Finding	Recommendation	Description	Amount	Category
1	1	WHIP payments to producers for damaged or destroyed tree, bush, and vine plants	\$157,212,092 <sup>40</sup>	Questioned Costs, No Recovery Recommended
2	4	WHIP payments to producers for loss of insured production	\$15,681,325 <sup>41</sup>	Questioned Costs, Recovery Recommended
<b>Total</b>			<b>\$172,893,417</b>	

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<sup>40</sup> The total amount of \$157,212,092 was for tree, bush, and vine net payments in Puerto Rico as of October 1, 2019.

<sup>41</sup> This amount is a subpart of the \$29.3 million paid for total production losses. The \$15.6 million is the total amount calculated for insured production losses prior to any adjustments made before payments were issued, such as adjustments for payment limitations. Due to the payment limitations not being accounted for in the data FSA provided, OIG could not determine a precise, aggregated net payment total. The agency needs to conduct individual reviews of the affected producers to determine a more precise amount and the total will likely include overpayments and underpayments.

## Exhibit B: Sites Visited

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This exhibit shows the name and location of FSA sites OIG visited prior to the World Health Organization declaring COVID-19 a global pandemic on March 11, 2020.

Name	Location
FSA National Office	Washington, DC
Puerto Rico State Office	San Juan, Puerto Rico
Adjuntas County Field Office	Adjuntas, Puerto Rico
Mayaguez County Field Office	Mayaguez, Puerto Rico
Ponce County Field Office	Ponce, Puerto Rico

## Exhibit C: Summary of Trees, Bushes, and Vines Pricing Issues by Type

This exhibit summarizes the pricing issues we identified for the 37 types of trees, bushes, and vines in Puerto Rico discussed in Finding 1.<sup>42</sup> All 37 types of trees, bushes, and vines had at least one issue as summarized below.

	Trees, Bushes, and Vines Eligible for WHIP Payments in Puerto Rico	Prices Inflated by Costs not Allowed in WHIP	Prices Based on Unrepresentative Crop Information	Prices Affected by Inaccurate Averaging	Prices Deflated Due to Exclusion of Authorized Costs	Price Included Unsupported Costs
1	Avocado	X				
2	Abiu	X			X	
3	Achachairu	X			X	
4	Breadfruit	X			X	
5	Cacao	X			X	
6	Carambola	X				
7	Cherimoya	X			X	
8	Citron	X				
9	Coconut	X			X	
10	Coffee	X	X			
11	Durian	X			X	
12	Genip	X			X	
13	Grapefruit	X				
14	Grapes					X
15	Guava	X			X	
16	Jack Fruit		X	X		
17	Lanson/Lang stat		X	X		
18	Lemons	X				
19	Limes	X				
20	Loquats	X			X	
21	Lychee	X			X	
22	Mango	X				
23	Mangosteen	X			X	
24	Oranges	X				
25	Papaya	X				
26	Passion Fruit	X			X	
27	Pawpaw	X			X	

<sup>42</sup> This exhibit also shows the 37 trees, bushes, and vines in Puerto Rico with established tree stage data from USDA FSA, *2017 Wildfire and Hurricane Indemnity Program (WHIP) Tree Stage Data for Puerto Rico*, PR Notice WHIP-2 (Nov. 21, 2018).

28	Pitaya (Dragon Fruit)	X			X	
29	Pulsa Pulasan	X			X	
30	Pummelo	X				
31	Rambutan	X			X	
32	Sapodilla		X	X		
33	Sapote	X			X	
34	Soursop	X			X	
35	Tangelo	X				
36	Tangerine	X				
37	Tangor	X				
	Total	33	4	3	19	1

## **Exhibit D: Crops Listed in PR Notice WHIP-1**

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This exhibit shows the 41 crops in Puerto Rico with established CDYs from PR Notice WHIP-1 dated July 15, 2018.

<b>Number</b>	<b>Crops Eligible for WHIP Payments in Puerto Rico</b>	<b>Number</b>	<b>Crops Eligible for WHIP Payments in Puerto Rico</b>
1	Avocados	22	Lettuce
2	Bananas	23	Mangos
3	Beans	24	Millet
4	Cabbage	25	Okra
5	Cantaloupes	26	Onions
6	Cassava	27	Oranges
7	Celery	28	Papaya
8	Cacao	29	Passion Fruits
9	Coffee	30	Peas
10	Corn	31	Peppers
11	Cucumbers	32	Pineapple
12	Dasheen	33	Plantain
13	Eggplant	34	Potatoes Sweet
14	Flowers	35	Pumpkins
15	Ginger	36	Sorghum Forage
16	Grapefruit	37	Squash
17	Grass	38	Tannier
18	Herbs	39	Tomatoes
19	Honey	40	Watermelon
20	Honeydew	41	Yam
21	Lemons		

**FSA's  
Response to Audit Report**

**TO: Steven Rickrode**  
**Acting Assistant Inspector General for Audit**

**FROM: Zachary W. Ducheneaux**  
**Administrator**

Date: 2023.02.08

17:18:54 -05'00'

**SUBJECT: Statement of Action: OIG Audit No. 03702-0003-31- Farm Programs:**  
**Wildfires and Hurricanes Indemnity Program – Puerto Rico**

On December 12, 2022, OIG held an exit conference with FSA, concerning the subject audit, resulting in three findings and five recommendations. Overall, OIG found that FSA did not have proper controls in place for ensuring accurate price establishment, production calculation methodology, or utilize proper oversight regarding the administration of WHIP in Puerto Rico.

FSA agrees additional controls should be implemented in future programs to ensure field offices are utilizing correct procedures and policy, and that prices are verified. FSA also agrees that additional training and communication to state and county offices should occur to ensure policies are followed and in place to provide adequate guidance for situations where policy does not provide specific direction. FSA would like to note that implementation of recommendations will be limited to future programs, with the exception of recommendation 4 as noted below.

Below are the FSA responses to each of the OIG recommendations:

**RECOMMENDATION 1**

Strengthen controls over the development and approval of tree, bush, and vine prices, and expand current review to include verification of the sufficiency and accuracy of supporting information.

**AGENCY RESPONSE**

FSA concurs with this recommendation. FSA acknowledges that strengthened controls in the development and approval process for tree, bush, and vine prices would improve program integrity. Currently FSA policy for 2020 and 2021 tree, bush and vine losses have not been finalized; however, if a pricing mechanism is used similar to WHIP, FSA will expand its review beyond attempting to assure consistency between States and include verification of the sufficiency and

accuracy of supporting information. Once policy is finalized, procedures and guidance will be updated in Handbook 3-ERP which will strengthen controls no later than October 31, 2023.

**RECOMMENDATION 2**

Establish a policy that, when using information or data from any outside entity, FSA will conduct an accuracy and applicability review with the outside entity to ensure that the information or data provided is being used in accordance with its intended purpose and with FSA regulations and policies.

**AGENCY RESPONSE**

FSA concurs with this recommendation. FSA will develop a Standard Operating Procedure (SOP) when outside sources or information are used for programmatic decisions. The SOP will require coordination with outside data source/entities to ensure that the information or data provided is being used in accordance with its intended purpose and with FSA regulations and policies. The agency will update current and future programmatic handbooks that rely on external data resources by September 30, 2023.

**RECOMMENDATION 3**

Conduct specific training that demonstrates how FSA should request and receive approval for practices that deviate from established policies and procedures.

**AGENCY RESPONSE**

FSA concurs with this recommendation. Handbook 1-CM will be amended to include language associated to deviating from National Office policy. Additionally, during the March National Office conference call with State Offices, the Safety Net Division will provide training on this updated provision to be shared with their county office. This action will be completed no later than May 30, 2023.

**RECOMMENDATION 4**

Based on established guidance, assess the actual production value for all questioned insured production losses totaling \$15,681,325 identified by OIG. Recover any disallowed costs from the producers and issue payments to the producers for any underpayments.

**AGENCY RESPONSE**

FSA concurs with intent of this recommendation. No action will be taken to recover overpayments given statute limitations. Specifically, the finality rule applies and prohibits FSA from pursuing overpayments when an error is determined more than 90 days from the date the application and all supporting documentation is filed. Since applications for WHIP were finalized and filed in 2018, no actions will be taken to recover any over payments. However, action will be taken for underpayments. FSA will complete a phased approach by evaluating

the Puerto Rico policy deviation used for determining production for calculating loss. Based on that evaluation, if necessary, FSA will take the next step in identifying errors, determining applicable under payments and issuing those payments. This action will be completed no later than January 30, 2024.

**RECOMMENDATION 5**

When designing future disaster relief programs, ensure that handbook procedures include a requirement that a State or national level employee must review or approve program documents, including applications, related to current State committee members.

**AGENCY RESPONSE**

FSA concurs with this recommendation. FSA previously identified this missing internal control in WHIP policy and has since incorporated the requirement of proper higher level approval authority for FSA employees and State and county committee participants within the following:

- Subparagraph 4A of Handbook 1-Quality Loss Assistance,
- Subparagraph 4 A of Handbooks 1 and 3 Emergency Relief Program covering Phase 1 and Phase 2 of 2020 and 2021 disaster assistance.

Additionally, during the March National Office conference call with State Office, the Safety Net Division will provide training on this updated guidance to be shared with their county office. This action will be completed no later than April 1, 2023.

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