



U.S. Department of Agriculture Office of Inspector General



Prevented Planting Followup

Audit Report 05601-0008-31

We reviewed how RMA administered and oversaw the Federal Crop Insurance Program's requirements for prevented planting.

OBJECTIVE

Our objective was to assess RMA's controls over the prevented planting provisions of the Federal Crop Insurance Program. We specifically evaluated how RMA administered and oversaw the provisions in light of our prior audit recommendations.

WHAT OIG FOUND

Risk Management Agency (RMA) updated its internal controls to administer and oversee prevented planting, including a new, more objective "1-in-4" rule to ensure that consistently wet acreage would not be eligible for prevented planting claims. Eligible acreage needs to have been planted to a crop at least once in the previous 4 years. However, RMA did not ensure that the specific acreage in a producer's land was eligible for an insurance payment. To make this determination, the producers' insurance adjusters used a mathematical approach to determine the total acres eligible for a prevented planting claim. During our review, we were unable to use the information in the adjusters' claim files to confirm that producers were eligible for the insurance payments they received.

REVIEWED

We reviewed laws, regulations, reports, and agency procedures, and we interviewed RMA National and regional officials to gain insight into RMA's processes. However, we could not complete a review of sampled prevented planting insurance claim files because we found that the documentation was not adequate to support or verify that claimed acres were eligible for prevented planting.

RMA agreed with our two recommendations, and we accepted management decision for both recommendations.

RECOMMENDS

RMA should strengthen the requirements in its Prevented Planting Standards Handbook to clarify how acres claimed are eligible for prevented planting. RMA should also identify new technologies that may improve approved insurance provider documentation to support and verify prevented planting claims.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: February 9, 2024

AUDIT

NUMBER: 05601-0008-31

TO: Marcia Bunger
Administrator
Risk Management Agency

ATTN: Gary Weishaar
Branch Chief
External Audits and Investigations Division

FROM: Janet Sorensen
Assistant Inspector General for Audit

SUBJECT: Prevented Planting Followup

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 all two audit recommendations in the report, and no further response to this office is necessary. 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.

Table of Contents

Background and Objectives	1
Finding 1: AIPs Did Not Document and Support Eligibility Determinations .	5
Recommendation 1	7
Recommendation 2	8
Scope and Methodology.....	9
Abbreviations	12
Exhibit A: Summary of Monetary Results	13
Exhibit B: Results of Prior Audit Recommendations	14
Agency’s Response	17

Background and Objectives

Background

The United States Department of Agriculture’s (USDA) Risk Management Agency (RMA) serves America’s agricultural producers through market-based risk management tools to strengthen the economic stability of agricultural producers and rural communities. RMA manages the Federal Crop Insurance Corporation (FCIC) to provide innovative crop insurance products to America’s farmers and ranchers. Approved insurance providers (AIPs) sell and service Federal crop insurance policies in every State as well as through a public-private partnership with RMA in Puerto Rico. Through AIPs, producers purchase over 1 million crop insurance policies each year.

RMA backs the AIPs, which share the risks associated with catastrophic losses due to major weather events. For crop years 2014 through 2020,¹ producers paid more than \$25.8 billion out of more than \$69.2 billion in total premiums; the Government subsidized the remaining \$43.4 billion. Based on RMA data for those years,² producers received more than \$51.4 billion in indemnity payments related to all types of crop insurance indemnity claims, including prevented planting claims. For this period, 19.6 percent of all indemnities (\$10.1 billion) were prevented planting payments (see Figure 1). The cause of loss was due to excess moisture for 88 percent of all prevented planting claims.

The Federal Crop Insurance Program supports producers that were prevented from planting their insured crop. RMA defines *prevented planting* as failure to plant the insured crop by the final planting date, or within any applicable late planting period, due to an insured cause of loss, such as excess moisture or drought. Failure to plant because of uninsured causes such as lack of proper equipment or labor to plant acreage, or use of a particular production method, is not considered prevented planting. In order for prevented planting acreage to be eligible, it must meet numerous criteria such as being free of trees, rocky outcroppings, or other factors, and be available to plant.³

¹ OIG issued audit report [05601-0001-31](#), *RMA: Controls Over Prevented Planting*, in September 2013. We selected the years following our prior audit for review.

² Risk Management Agency, National Summary by Insurance Plan, <https://www.rma.usda.gov/Information-Tools/Summary-of-Business> (as of Apr. 24, 2023).

³ USDA FCIC, *Prevented Planting Standards Handbook: 2018 and Succeeding Crop Years*, § 2626, “Eligible Acres,” 25370 (Oct. 2017).

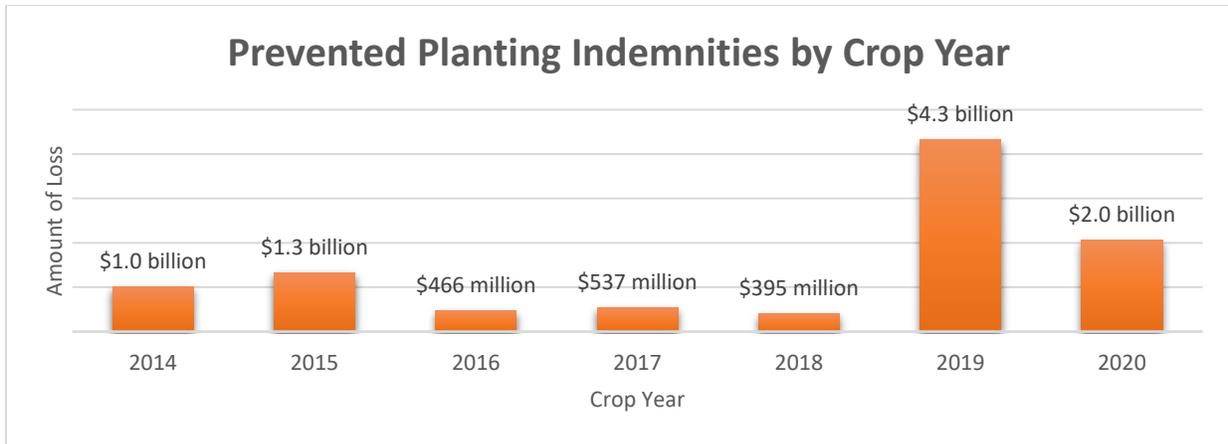


Figure 1: Total prevented planting indemnities since OIG’s 2013 audit.⁴
Figure by OIG, based on RMA data obtained from Oct. 2020 through April 2021.

To ensure effectiveness and efficiency, RMA needs to have various controls over the program as it works with the AIPs. RMA administers prevented planting and provides oversight of the AIPs as they implement the program. RMA and the AIPs have responsibilities related to an insured producer’s claim. Figure 2 illustrates the prevented planting claims process.

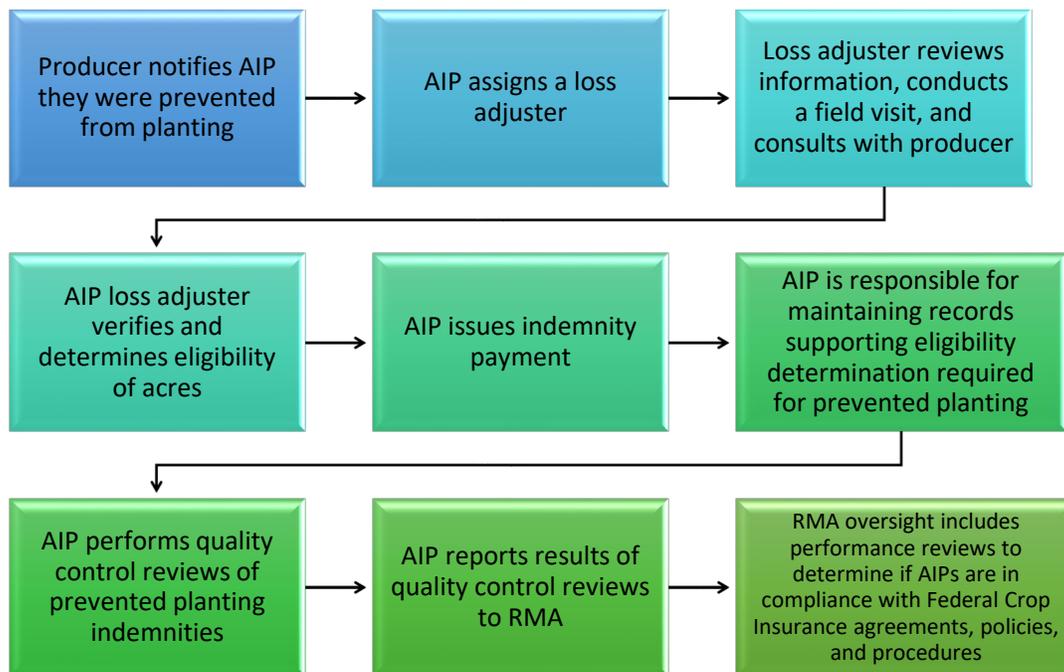


Figure 2: Prevented planting claims process. Figure by OIG.

In 2012, RMA implemented an additional requirement for prevented planting eligibility in the area known as the Prairie Pothole Region, which includes Iowa, Minnesota, Montana, North

⁴ According to the National Oceanic and Atmospheric Administration, in 2019, several States had their wettest year on record and above-average annual precipitation was observed across much of the Nation in 2020 as well.

Dakota, and South Dakota. The requirement, known as the “1-in-4” rule, means that for acreage to be eligible for prevented planting, among other requirements, it must have been planted at least once in the past 4 crop years.⁵ RMA added this Special Provision to reduce or eliminate prevented planting claims on acreage that is repeatedly wet year after year. After the 2020 crop year, RMA made this a nationwide requirement.⁶

The following animated map geographically shows the cumulative result of prevented planting indemnity payments disbursed by county in the Prairie Pothole Region.

Figure 3: This animated figure shows the accumulated disbursement of prevented planting indemnities in the Prairie Pothole Region from 2014 through 2020. Totals are cumulative. Figure by OIG based on RMA data provided as of February 4, 2021. The interactive functions of this map only work in PDF.

In September 2013, OIG released audit report *RMA: Controls Over Prevented Planting*.⁷ That report included three findings and eight recommendations pertaining to the prevented planting provisions. OIG determined that RMA needed to improve the prevented planting provisions to be more cost effective; encourage producers to plant a crop, where possible; and make eligibility

⁵ USDA FCIC, *Prevented Planting Standards Handbook: 2018 and Succeeding Crop Years*, §11, “Prevented Planting Provisions,” 25370 (Oct. 2017). “Special Provisions” are part of the policy that contains specific provisions of insurance for each insured crop that may vary by geographic area. RMA personnel informed us that the Special Provisions for the “1-in-4” rule applied to all counties located in the Prairie Pothole Region States (Iowa, Minnesota, Montana, North Dakota, and South Dakota).

⁶ 7 C.F.R. § 457.8.

⁷ Audit report [05601-0001-31](#), *RMA: Controls Over Prevented Planting* (Sept. 2013).

document and support prevented planting eligibility. Exhibit B summarizes the status of corrective actions.

Objectives

Our objective was to assess the controls over the prevented planting provisions of the Federal Crop Insurance Program. Specifically, we evaluated the adequacy of RMA's administration and oversight of the provisions, including the actions taken in response to the recommendations of OIG audit report 05601-0001-31, *RMA: Controls Over Prevented Planting*.

Finding 1: AIPs Did Not Document and Support Eligibility Determinations

Since our 2013 report,⁸ RMA updated the internal controls it uses to administer and oversee prevented planting, such as revising the *Prevented Planting Standards Handbook* and other provisions of the program. Revisions included the new, more objective “1-in-4” rule, a provision designed to ensure consistently wet acreage would not be eligible for prevented planting insurance coverage if it is not planted at least once in 4 years. However, we found that RMA did not ensure AIPs adequately documented whether producers had planted the acres to a crop in at least 1 of the 4 most recent crop years as required to be eligible for prevented planting. This occurred because RMA allows AIPs to use a mathematical process to determine the number of acres eligible for a prevented planting claim. However, this process does not identify which specific acres were eligible for prevented planting. Without documentation from the AIPs that demonstrated which acres were eligible, we determined that 9 of 9 AIPs related to our sample⁹ made prevented planting payments totaling more than \$1.087 billion in crop year 2020 in North Dakota and South Dakota that were not fully supported.¹⁰

According to the Special Provisions in the Prairie Pothole Region, to be eligible for a prevented planting payment, acreage claimed as prevented planting must have been planted to a crop in at least 1 of the 4 most recent crop years.¹¹ Once the acreage does not satisfy this “1-in-4” rule in the preceding crop years, RMA considers it physically unavailable for planting. For this land to become eligible again, it must be planted to a crop for 2 consecutive crop years. Acreage must be physically available for planting to be eligible for a prevented planting payment.¹² The *Prevented Planting Handbook* requires verification that reported prevented planting acres are eligible.¹³ RMA defines *verification* as the determination of whether information submitted is true and accurate through independent third parties or independent documentation in accordance with

⁸ Audit report [05601-0001-31](#), *RMA: Controls Over Prevented Planting* (Sept. 2013).

⁹ We selected claims from Arkansas, North Dakota, and South Dakota. These three States had the highest total prevented planting payments from crop years 2014 to 2020. At the time we drew our sample, there were 9 total AIPs that administered the claims in our sample and thus we refer throughout this report to 9 AIPs. Later, 2 of the AIPs merged.

¹⁰ In crop years 2019 and 2020, two of our sampled States, North Dakota and South Dakota, were subject to Special Provisions establishing the “1-in-4” rule. The 9 AIPs related to our sample made more than \$1.087 billion in prevented planting payments in North Dakota and South Dakota in crop year 2020. We are questioning only these 2020 costs because we halted our review after we could not confirm the 2020 claims (as discussed in the finding). Nationwide across all AIPs for crop years 2019 and 2020, prevented planting payments totaled more than \$6.3 billion.

¹¹ USDA FCIC, *Prevented Planting Standards Handbook: 2018 and Succeeding Crop Years*, §11, “Prevented Planting Provisions,” 25370 (Oct. 2017). “Special Provisions” are part of the policy that contains specific provisions of insurance for each insured crop that may vary by geographic area. RMA personnel informed us that the Special Provisions for the “1-in-4” rule applied to all counties located in the Prairie Pothole Region States (Iowa, Minnesota, Montana, North Dakota, and South Dakota).

¹² *Ibid.*

¹³ USDA FCIC, *Prevented Planting Standards Handbook: 2018 and Succeeding Crop Years*, § 74, “Prevented Planting Payment Determinations,” 25370 (Oct. 2017).

FCIC procedures.¹⁴ According to RMA, “with respect to certifications, asking the policyholder whether the information is true and accurate does not constitute verification.”¹⁵

During our review of sampled AIP claim files, we noted that the documentation was not adequate to support or verify eligibility for prevented planting. AIP documentation to support evaluations of the “1-in-4” rule was based on producer self-certified acreage reports from the 4 previous crop years.¹⁶ The files showed that loss adjusters used a mathematical process to determine eligible prevented planting acres. OIG determined that all 9 AIPs used the mathematical approach and relied on the producer-certified forms. However, the mathematical approach did not allow us to identify or determine and verify if the claimed prevented planting acres were planted at least once in the 4 previous crop years. Therefore, the mathematical approach constitutes the loss adjuster’s reliance on the producer’s self-certification, which, according to the Standard Reinsurance Agreement, is not a form of verification. Thus, because we could not confirm that the acres claimed were eligible for prevented planting, we halted our file reviews.

We discussed our concern with RMA officials that it did not appear that AIP loss adjusters were clearly identifying how they determined that the specific prevented planting acres claimed were or were not eligible according to the “1-in-4” rule. An RMA official responded that the RMA handbook requires AIPs to first determine the number of eligible acres, including whether the land is physically available for planting, and that meeting the “1-in-4” rule is only one part of the determination. In addition, the RMA official explained that there are no examples in the handbook that explicitly demonstrate how to apply the “1-in-4” rule. Another RMA official stated that they allow the AIPs to mathematically calculate the prevented planting claims because it is not feasible to measure and specifically identify acreage claimed for prevented planting. RMA officials acknowledged that the handbook may need clarification.

OIG recognizes that physical measurement to determine how many acres are wet at the time of a loss adjuster’s field inspection is a challenge, particularly in excessively wet years with a high volume of claims. However, RMA and AIP officials mentioned new technologies such as global positioning system devices, drones, and satellite imagery that could allow for more accurate determinations of prevented planting claims. Both RMA and AIP officials expressed that they were also open to the use of new technologies to ensure accurate prevented planting payments.

We concluded that RMA should strengthen the guidance it provides to the AIP loss adjusters responsible to verify prevented planting claims, such as by providing more detailed instruction and examples for loss adjusters to follow when determining and verifying eligibility for the “1-in-4” rule. We reached this conclusion because we could not complete a file review to verify eligibility under the “1-in-4” rule for prevented planting acreage. We determined that it would be beneficial for RMA to clarify how the eligibility determinations can be supported and verified during reviews. We noted RMA expanded the “1-in-4” rule nationwide for crop year 2021, which expanded the number of acres for which AIPs need to effectively document eligibility for prevented planting. By taking steps to clarify how acres claimed as prevented planting are to be

¹⁴ 2019 Standard Reinsurance Agreement § 1, “Definitions” (July 2018).

¹⁵ Ibid.

¹⁶ Producers certify crop acreage information on USDA FSA *Report of Acreage* FSA-578 (Aug. 22, 2019) forms.

verified as eligible for prevented planting, RMA can better ensure that AIPs do not make indemnity payments for acres that are not regularly capable of being planted.

The “1-in-4” rule applied in two of our sampled States (North Dakota and South Dakota) during the time of our review.¹⁷ We noted that claims in these two States constituted a significant portion of total prevented planting claims during the period under review.

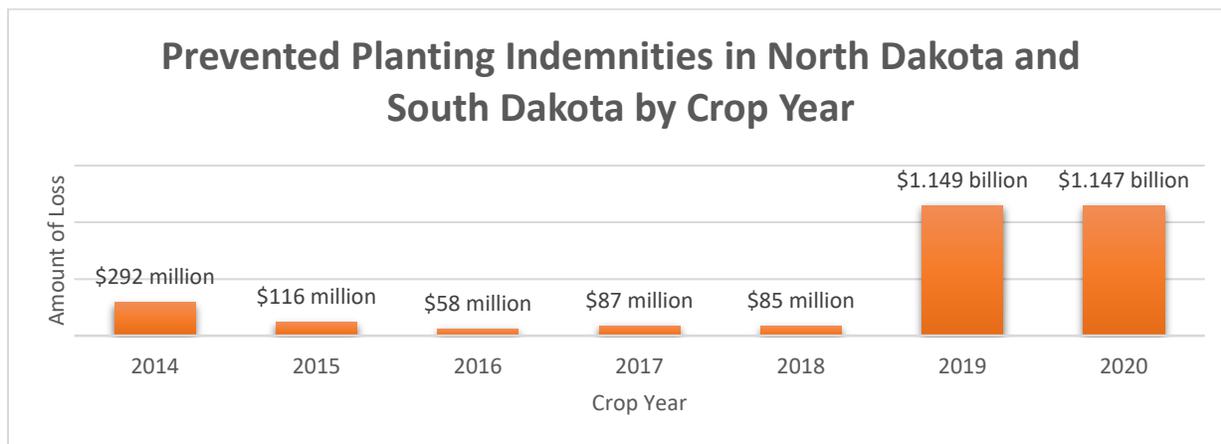


Figure 4: Total Prevented Planting Indemnities in North Dakota and South Dakota.¹⁸ Figure by OIG, based on RMA data provided on Feb. 4, 2021.

We are questioning only the most recent year of payments within our review scope. We determined that the 9 AIPs were responsible for more than \$1.087 billion of the \$1.147 billion of the 2020 prevented planting indemnities made in North Dakota and South Dakota.¹⁹ Since OIG determined the 9 AIPs relied on mathematical calculations, we concluded that all payments made by these AIPs were not fully supported.

RMA officials said they could understand how OIG reached our conclusion and that they would consider clarifying their prevented planting procedures. Additionally, they stated that RMA is looking into new technologies that could be used to improve the process for adjusting prevented planting claims.

Recommendation 1

Strengthen RMA handbook requirements to clarify how acres claimed as prevented planting are to be verified as eligible for prevented planting.

¹⁷ Claims in Arkansas were not subject to Special Provisions establishing the “1-in-4” rule until crop year 2021.

¹⁸ According to the National Oceanic and Atmospheric Administration, in 2019 and 2020, areas in North Dakota and South Dakota had above-average annual precipitation.

¹⁹ A total of 6 other AIPs operated in North Dakota and South Dakota but did not have claims selected for our sample.

Agency Response

RMA agrees with this recommendation. RMA will clarify language in appropriate handbooks to ensure preventing planting acreage is properly verified for eligibility.

OIG Position

We accept management decision on this recommendation.

Recommendation 2

Conduct a review to identify any new or additional technologies that may improve AIP documentation to support and verify accuracy of prevented planting claims.

Agency Response

RMA agrees with this recommendation. In September 2023, RMA executed a 2-year extension to the Research Support Agreement with the University of Illinois to study prevented planting mapping and standing water detection to support OIG findings regarding identification and documentation of eligible and ineligible prevented planting acres. OIG recommended RMA conduct a review to identify the use of new technologies, including satellite imagery, to aid in identifying and measuring prevented planting acres. This work seeks to identify technology solutions to support the identification of eligible and ineligible acres, support documentation, and ensure accuracy of prevented planting claims. Preliminary findings are expected to be complete by November 30, 2024, with a final report due July 2025.

OIG Position

We accept management decision on this recommendation.

Scope and Methodology

To accomplish our objectives, we evaluated the adequacy of RMA’s implementation of the 8 recommendations from the prior audit.²⁰ We also evaluated controls over the prevented planting provisions. The audit covered crop years 2019 and 2020. We initiated fieldwork in December 2020 and completed it in November 2023. Due to health and safety concerns related to the coronavirus disease 2019 pandemic, we conducted the audit remotely using digital copies of files obtained from AIPs.

We determined from data RMA provided on February 4, 2021, that AIPs issued more than \$10.1 billion in prevented planting payments nationwide for crop years 2014 through 2020. We selected the three States (Arkansas, North Dakota, and South Dakota) with the highest total prevented planting payments during this time period for review. AIPs issued more than \$4.319 billion for prevented planting indemnities in crop year 2019 and more than \$2.059 billion for prevented planting indemnities in crop year 2020. In the 3 States we sampled, AIPs issued more than \$1.381 billion for prevented planting indemnities in crop year 2019 and more than \$1.335 billion for prevented planting indemnities in crop year 2020.

In order to evaluate RMA’s controls over the prevented planting provisions, including the “1-in-4” rule, we identified the producers that had prevented planting claims in the same State and county for 2019 and/or 2020 as well as the 4 previous years. In our sampled States, RMA issued 540 indemnities totaling more than \$68.4 million in 2019 and 836 indemnities totaling more than \$125.7 million in 2020. These indemnities went to producers who had prevented planting claims in the same State and county for the current crop year and the 4 previous crop years. We used a random number generator to select a non-statistical sample and reviewed 10 producers from each of our 3 sampled States. However, with the documentation we received from AIPs, we were unable to determine if eligibility requirements were met. As discussed in the finding, we halted our review of the sampled claims.

We determined there were 9 AIPs associated with our samples,²¹ and that these 9 AIPs provided more than \$5.8 billion in prevented planting payments in 2019 and 2020 (92 percent of prevented planting payments nationwide). For Arkansas, North Dakota, and South Dakota, these 9 AIPs administered more than \$2.5 billion out of more than \$2.7 billion in prevented planting payments made in 2019 and 2020.

To accomplish our objectives, we performed the following audit procedures:

- Reviewed applicable laws, regulations, and agency procedures concerning the administration of the Federal Crop Insurance Program, specifically those provisions pertaining to prevented planting;
- Interviewed officials assigned to RMA’s national office in Washington, D.C., and RMA’s Product Management Division in Kansas City, Missouri, to assess controls over

²⁰ Audit report [05601-0001-31](#), *RMA: Controls Over Prevented Planting* (Sept. 2013).

²¹ At the time we drew our sample, there were 9 total AIPs that administered the claims in our sample and thus we refer throughout this report to 9 AIPs. Later, 2 of the AIPs merged.

prevented planting and to gain an understanding of RMA's expectations of the AIPs that administer the prevented planting policies, provisions, and procedures;

- Interviewed officials assigned to the RMA Northern Regional Compliance Office in Eagan, Minnesota, to gain an understanding of how RMA enforces compliance with prevented planting policies, provisions, and procedures;
- Reviewed the results of a 2015 study on prevented planting and pre-planting costs to determine the basis on which RMA established its current prevented planting coverage levels;
- Began and then halted reviews of prevented planting claim files, as well as policy and quality control review documents associated with the claims, to verify whether certain key provisions were correctly implemented in the loss adjustment process by the AIPs;
- Interviewed AIP personnel to understand their prevented planting claim processes for loss adjusters; and
- Reviewed oversight reports conducted by RMA to evaluate and determine whether internal controls and processes comply with Federal crop insurance agreements, policies, and procedures.

To conduct this audit, we obtained data from RMA's Policy Acceptance and Storage System. We assessed the reliability of the RMA-provided data by comparing data in the system to publicly available aggregate totals for crop years 2014 through 2020 and interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report. However, we did not assess the overall reliability of any RMA information systems, as we did not rely solely on system 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 relied on the work of specialists from OIG's Office of Analytics and Innovation to develop the analytical map presenting the geographic disbursement of prevented planting payments at the county level. We obtained documentation to ensure these specialists were qualified professionally, competent in the work we relied upon, and met independence standards.

We assessed internal controls to satisfy the audit objectives. Our assessment included internal control components and principles of the Standards for Internal Control in the Federal Government.²² In particular, we assessed the following components and underlying principles:

²² United States Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Sept. 2014).

Component	Principle
Control Activities	Management should design control activities to achieve objectives and respond to risk
Information and Communication	Management should use quality information to achieve the entity's objectives
Information and Communication	Management should internally communicate the necessary quality information to achieve the entity's objectives
Monitoring	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results

However, because our review was limited to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. We discussed our conclusions with agency officials and included their responses, as appropriate.

Abbreviations

AIP	Approved Insurance Provider
FCIC.....	Federal Crop Insurance Corporation
FSA	Farm Service Agency
OIG	Office of Inspector General
RMA	Risk Management Agency
USDA.....	United States Department of Agriculture

Exhibit A: Summary of Monetary Results

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

Finding	Recommendation	Description	Amount	Category
1	1		\$1,087,545,244	Questioned Costs/No Recovery
Total			\$1,087,545,244	

Exhibit B: Results of Prior Audit Recommendations

The table below lists the results of RMA's implementation of prior audit recommendations from Audit Report 05601-0001-31.²³ We determined that the corrective actions for 6 out of 7 applicable recommendations were effective.

Recommendation No.	Prior Recommendation	Fully Implemented?	Corrective Action Effective?
1	Obtain updated pre-planting cost information and use it to reevaluate the current coverage levels provided for prevented planting. Make any necessary changes to reduce program costs, where possible, and bring the coverage levels consistently in line with pre-planting costs for each crop	Yes	Yes
2	Establish a schedule by which prevented planting coverage levels will periodically be reevaluated to ensure that the levels remain in an appropriate and consistent relationship with pre-planting costs	Yes	Yes
3	Obtain a formal Office of General Counsel opinion regarding whether the Risk Management Agency is prohibited from applying an assigned yield to prevented planting acreage and using it to calculate a producer's actual production history when a second crop is not planted	Yes	Yes
4	If the Office of the General Counsel determines that an assignment of yield is not prohibited, evaluate what the proper yield assignment would be, and take appropriate action to implement the results	Not applicable, due to opinion provided in response to recommendation 3.	

²³ Audit report [05601-0001-31](#), *RMA: Controls Over Prevented Planting*, Sept. 2013.

Recommendation No.	Prior Recommendation	Fully Implemented?	Corrective Action Effective?
5	If the Office of General Counsel determines that an assignment of yield is prohibited, prepare a decision memorandum for consideration by the Secretary and follow up accordingly. The decision memorandum should review other potential actions that could be taken, including seeking legislative change to allow Risk Management Agency to apply an assigned yield to prevented planting acreage, and using it to calculate a producer's actual production history when a second crop is planted	Yes	Yes
6	Revise the Special Provisions of Insurance to replace language regarding normal weather determinations with another more objective standard to apply when determining if acres are available for planting. Initiate any regulatory action required to implement these revisions	Yes	No, see discussion in finding 1.
7	Ensure that any revisions in the prevented planting loss adjustment standards include specific instructions to require approved insurance providers to document their determinations	Yes	Yes

Recommendation No.	Prior Recommendation	Fully Implemented?	Corrective Action Effective?
8	Issue guidance emphasizing that any quality control reviews that approved insurance providers perform on prevented planting claims must include the verification that loss adjusters comply with Federal Crop Insurance Corporation procedures, including the completion of all required eligibility determinations and the inclusion of all supporting documents in the producer's file	Yes	Yes

**RMA's
Response to Audit Report**



United States
Department of
Agriculture

Farm Production
and Conservation

Risk
Management
Agency

1400 Independence
Avenue, SW
Stop 0801
Washington, DC
20250-0801

TO: Yarisis Rivera-Rojas
Deputy Assistant Inspector General for Audit
Office of Inspector General

FROM: Heather Manzano
Audit Liaison Official
Risk Management Agency

**HEATHER
MANZANO**

Digitally signed by
HEATHER MANZANO
Date: 2023.12.22
13:24:44 -05'00'

SUBJECT: Office of Inspector General Audit 05601-0008-31 Prevented Planting
Follow-up Management Decision

RMA agrees with the OIG Audit 05601-0008-31 Prevented Planting Follow-up finding and recommendations. RMA requests Management Decision for recommendations 1 and 2.

Recommendation 1

Strengthen RMA handbook requirements to clarify how acres claimed as prevented planting are to be verified as eligible for prevented planting.

RMA Response to Recommendation 1

RMA will clarify language in appropriate handbooks to ensure preventing planting acreage is properly verified for eligibility. The estimated completion date is November 1, 2024.

Recommendation 2

Conduct a review to identify any new or additional technologies that may improve AIP documentation to support and verify accuracy of prevented planting claims.

RMA Response to Recommendation 2

In September 2023, RMA executed a 2-year extension to the Research Support Agreement with the University of Illinois to study prevented planting mapping and standing water detection to support OIG findings regarding identification and documentation of eligible and ineligible prevented planting acres. OIG recommended RMA conduct a review to identify the use of new technologies, including satellite imagery, to aid in identifying and measuring prevented planting acres. This work seeks to identify technology solutions to support the identification of eligible and ineligible acres, support documentation, and ensure accuracy of prevented planting claims. Preliminary findings are expected to be complete by November 30, 2024, with a final report due July 2025. The estimated completion date is November 30, 2024.

Learn more about USDA OIG at <https://usdaoig.oversight.gov>
Find us on LinkedIn: US Department of Agriculture OIG
Find us on Twitter: @OIGUSDA

**Report suspected wrongdoing in USDA programs:
<https://usdaoig.oversight.gov/hotline>**

Toll-free: 800-424-9121

In Washington, DC: 202-690-1622



All photographs on the front and back covers are from Adobe Stock with a licensing agreement.
They do not depict any particular audit, inspection, or investigation.

U.S. Department of Agriculture (USDA) is an equal opportunity provider, employer, and lender.

In accordance with Federal civil rights law and USDA civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.