



February 10, 2022

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C., 20250

Dear Secretary Vilsack:

Thank you and your team for working to implement the agricultural disaster aid provisions that were included in the continuing resolution (H.R. 5305), which was signed into law on September 30, 2021. We greatly appreciate your comments made at the recent House Agriculture Committee hearing on the timeline for implementation of the ad hoc disaster aid program and how the U.S. Department of Agriculture (USDA) might issue payments. Additionally, the National Association of Wheat Growers (NAWG) appreciates the access and engagement from USDA and the Farm Service Agency (FSA) in working to implement this and past ad hoc disaster programs.

Given significant disasters experienced in recent years for wheat growers, we would like to take this opportunity to reiterate these past challenges from a wheat perspective related to the Wildfires and Hurricanes Indemnity Program (WHIP), subsequent WHIP Plus (WHIP+), and the Quality Loss Adjustment (QLA) program. From NAWG's perspective, there is demonstrated need to see these programs get rolled out in a timely manner. However, we also need to make sure that as these programs are rolled out, it works for wheat farmers who have experienced extreme drought in some areas, excessive moisture in others, and damaging winds. The following examples are some of the challenges and experiences that NAWG has encountered as it relates to wheat growers, and we wanted to bring these to your attention as you continued to review past ad hoc programs and the language included in H.R. 5305, which includes several technical improvements.

Regarding WHIP+, there were some challenges related to differentiating between losses resulting from "excessive moisture" versus "flooding." Congress gave direction to the U.S. Department of Agriculture (USDA) to include "excessive moisture" as a cause of loss for eligibility. Confusion resulted at the ground level if the cause of loss with crop insurance wasn't included in the Secretarial disaster designation triggering eligibility, despite the intention that coverage be available to either cause of loss. In these instances, additional paperwork and documentation were required even though both were eligible causes of loss. Additionally, given the severe prevented planting that occurred in 2019 because of wet conditions, USDA provided a "top-up" payment of 10 percent for those producers who had a prevent plant indemnity. While this was important assistance for growers who experienced these losses, it was not available to 2019 winter wheat growers because the program was restricted to the calendar year 2019 losses; 2019 winter wheat was seeded in the fall of 2018, and so any prevented planting that would have been experienced would have been in the calendar year 2018. Those growers were ultimately made eligible for WHIP+ assistance, but they had to wait several months for it to become available. If any future top-up payments are considered, we would ask to evaluate this issue to process more timely winter wheat payments.

