

August 25, 2020

The Honorable Undersecretary Bill Northey
Undersecretary for Farm Production and Conservation
1400 Independence Ave, SW
Washington, DC 20250

Dear Undersecretary Northey:

We very much appreciate the recent actions USDA has taken to improve the Coronavirus Food Assistance Program (CFAP). Since the program's rollout in May, specialty crop participation nationwide has lagged far behind other commodities. In response to those deficiencies, USDA has significantly expanded crop eligibility for the program, as well as made it easier for producers to be eligible for funds with technical changes to long standing guidance. These steps will enhance the program and no doubt lead to more growers both being eligible for, as well as receiving, larger amounts of funding. We thank USDA for these changes.

Looking forward, we believe additional enhancements are necessary to provide equitable relief for the specialty crop industry. As you continue to implement CFAP and look toward additional relief options in the coming months, we want to provide USDA some additional insight as to how our sector can best be further assisted in the COVID-19 fallout.

CFAP Adjustments

We strongly believe that relief should be available to losses incurred after April 15, 2020. As currently constructed, large numbers of growers are excluded from the program and USDA should strive to expand eligibility beyond that end date. We note that as part of the CARES Act Congress provided USDA \$14 billion in March for COVID-19 relief, and we believe USDA already has resources to expand the program beyond April 15th. We believe that the pandemic will likely persist through calendar year 2020. As a result we want to see CFAP assistance carry forward through the rest of the year.

As USDA considers the next evolution of the CFAP, we would suggest that rather than calculating injury suffered for literally hundreds of different specialty crop types on a crop-by-crop basis, USDA can focus its analysis to determine whether the farmer his/herself has been injured and whether their income has suffered harm as a result of the current crisis. USDA could for example compare profit and loss this year versus a similar period over a period of time in prior years; such a revenue approach would more accurately reflect injury suffered.

Our alliance is working to push Congress for additional USDA resources to ensure the full year is covered. Assuming that CFAP can be extended for the rest of the year, we would ask that USDA remain open to additional administrative changes—as it has thus far—as more producers in different parts of the country become eligible. As that happens, yet unforeseen problems may arise. Beyond extending eligibility window, we ask the Administration to consider how to increase the payment cap beyond current levels. We understand that USDA has been creative in coming up

with a way to provide upto \$750,000 per farm but losses for larger growers have been staggering thus we ask the Administration to consider even greater flexibility.

Specialty Crop Grower Outreach

With respect to CFAP we believe that USDA should strive to reach out to every specialty crop grower in the United States, as it has done with other programs. For example, USDA engaged every U.S. dairy producer after the 2018 Farm Bill created the Dairy Margin Coverage (DMC) program. USDA should similarly engage with all specialty crop growers with respect to CFAP. To that end, we propose the following outreach measures, as we acknowledge that USDA, and especially the Farm Service Agency, does not have abundant experience with our sector of agriculture.

- 1) **Access other USDA departments to secure additional existing data on producer names.** The Risk Management Agency should have names of specialty crop growers who purchase crop insurance. While crop insurance is not prevalent nor readily available for field-grown specialty crops, crop insurance is widely used in orchard and vine crops. As a percentage of production, many orchard crops achieve 60-80% coverage. Accessing RMA records as a result would be helpful in reaching out. In addition, NRCS and AMS data should also be accessed but it must be stressed that AMS data is likely less complete, and NRCS enrollment is much lower as a percentage of coverage as compared to other crops or livestock parts of American agriculture. Nonetheless cross-referencing these two additional datasets should provide some benefit.
- 2) **Engage state departments of agriculture and county agriculture commissioners.** We believe state and local agricultural entities will have additional data to help USDA conduct outreach. This is likely the case with respect to county agriculture commissioners, as they may be able to access a large database of specialty crop growers that USDA cannot. We strongly suggest that USDA engage with county agricultural commissioners, especially those in the largest specialty crop growing states, and ask for their assistance.
- 3) **Engage with specialty crop trade associations.** Most associations have been actively pushing to inform their members of CFAP. We ask USDA to consider a joint printed mailer, as we believe this approach remains one of the most effective means of outreach to farmers.

Future COVID Loss Relief

The fresh produce industry strongly urges additional resources be provided to assist growers in protecting the health and safety of their workforce. Most urgently, farmers need access to additional testing for their farmworkers, priority access to PPE and a vaccine and/or therapeutic medicines as they become available, as well as funding to quarantine those who either test positive for COVID-19 or have been exposed to a positive individual. Some farms have been

fortunate to find available tests and are paying for their workers to be tested; however, in rural parts of the country, finding tests for potentially hundreds of workers can be very difficult, and testing results are often long-delayed. Furthermore, the cost of widespread and frequent re-testing, if feasible, is also beyond the financial reach of many farms, most of which are family-owned and operated. Other farming operations have taken the next step and are renting hotel rooms to isolate or quarantine positive and exposed employees, if such accommodations are available. However, it is again cost-prohibitive for many farms to provide 14 days of isolation/quarantine lodging, which in many cases is stretching beyond that period as testing and lab results are badly delayed. Compounding the costs of testing and housing are additional COVID-19 expenses, including masks, gloves, disinfectants, sanitizers, touchless thermometers, and other administrative and engineering controls. Most farmers have some of these supplies on hand and are providing them to their employees, but not all are adequately stocked and the list of supplies and other requirements continue to expand as we learn more about COVID-19. Assistance to secure these supplies will help secure the supply chain of fresh produce so consumers can rely on their grocery shelves continuing to be stocked appropriately.

Thank you for your continued attention to the needs of agriculture workers and their employers as we collectively work to keep food on American tables during the COVID-19 pandemic and beyond.

Sincerely,

Dave Puglia
President & Chief Executive Officer
Western Growers

Kam Quarles
Chief Executive Officer
National Potato Council

Michael A. Joyner
President
Florida Fruit & Vegetable Association

Tom Stenzel
President
United Fresh Produce Association