

For: State and County Offices

Common Errors Found in Reviewing NAP Area Requests

Approved by: Deputy Administrator, Farm Programs



1 Overview

A

Background

Notice NAP-30 included a report of NAP area activity through June 11, 1999. The notice reported significant area activity in FY 1999.

The large number of area requests submitted in FY 1999 have been reviewed and processed. While processing these requests, common errors in area definition and crop data were identified. Some of the errors demonstrate a need for offices to familiarize themselves with NAP procedure. Others show a need for procedural clarifications or amendments.

B

Purpose

This notice:

- identifies common errors found in NAP area requests
- provides recommendations to avoid common errors
- minimizes delay in reviewing and acting on area requests.

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**County Office
and STC Action**

County Offices and STC's shall review this notice to ensure that these discrepancies are reduced or eliminated.

Disposal Date January 1, 2000	Distribution State Offices; State Offices relay to County Offices
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Notice NAP-34

2 Errors in NAP Area Requests

A

Frequent Common Errors The following are frequent common errors found in reviewing NAP area requests, frequency of the error, and recommendation to avoid the error.

Frequent Common Errors (Occurring on More Than 50 Percent of Cases and/or Revisions)	
Identified Error	What Should Have Been Done or What Should Have Happened?
A Statewide county-expected yield is continuing to be established for the same crop for each county within a State.	Yields should be established on a county-by-county basis. Yields established Statewide may not be representative of the crop's potential production in a particular county or potential defined area. NAP has been available since 1995, and APH data or similar information should be available for establishing expected yields county-by-county. Note: It is important that NAP is publicized and that producers are encouraged to report their crop acreage and production. These reports provide information which would be more representative of crop's potential production in a particular county or counties for establishing county-expected yields according to 1-NAP, paragraph 107.
Supporting documentation is missing showing how unaffected acres were impacted when notices of loss do not account for all acreage within a county or defined area.	Provide documentation showing the average crop loss within the defined area on unaffected acres. Crop acreage not accounted for on notices of loss is assumed to have suffered no loss unless specific information is provided to the contrary according to 1-NAP, subparagraphs 4.9 A and 101 B.

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2 Errors in NAP Area Requests (Continued)

A
Frequent
Common Errors
(Continued)

Frequent Common Errors (Occurring on More Than 50 Percent of Cases and/or Revisions)	
Identified Error	What Should Have Been Done or What Should Have Happened?
Crop definition for CAT 1 forage is not being submitted with the NAP area request.	<p>Procedure is being updated to assist STC's in submitting area requests with forage crops. Forage crop losses should be determined based on the STC's definition of CAT 1 forage or CAT 2 forage according to 1-NAP, paragraph 173. A list of forages that make up the CAT 1 forage within each county in the defined area should be submitted with the NAP area request.</p> <p>Until procedure is issued, continue to follow 1-NAP, paragraph 187, which provide that before the beginning of the year, STC's shall identify species, type, or variety of forage present in a county and identify it as either predominately grazed (Category 1) or predominately mechanically harvested (Category 2).</p>
The same county-expected yield is being recommended for a crop in an area that has had multi-year disaster losses.	<p>Yields shall be reviewed for crops that continue to have disaster losses year-after-year. When Noninsured Assistance Program Branch reviews a NAP area request, yields are adjusted when the crop has been approved in 2 or more previous years and APH data is not available to support the recommended yield.</p> <p>Presently offices are not instructed to perform these adjustments in procedure; however, instructions will be issued in a future amendment. Until that time, STC's shall reduce the county-expected yield for a crop with multi-year disaster losses by:</p> <ul style="list-style-type: none"> • 20 percent for 2 previous years • 25 percent for 3 previous years • 30 percent for 4 previous years. <p>Exception: If APH data for the crop/type/practice and intended use in the county shows that these adjustments to county-expected yields are inappropriate, STC shall document such data and determine an appropriate county-expected yield.</p>
Documentation is not provided showing how irrigated crops are impacted by drought conditions.	Provide documentation showing how an irrigated crop is impacted by drought conditions according to 1-NAP, subparagraph 21 C.

Notice NAP-34

2 Errors in NAP Area Requests (Continued)

B

Semi-Frequent Common Errors The following are semi-frequent common errors found in reviewing NAP area requests, frequency of the error, and recommendation to avoid the error.

Semi-Frequent Common Errors (Occurring Less Than 50 Percent but More Than 20 Percent of Cases and/or Revisions)	
Identified Error	What Should Have Been Done or What Should Have Happened?
Recalculation of area loss is not being performed when the county-expected yield is different from the STC-established yield.	Area crop loss should be recalculated at the STC level to determine if the crop suffered the requisite area loss level when the county-expected yield is different from what the STC established according to 1-NAP, subparagraph 4.9 A.

C

Infrequent Common Errors The following are infrequent common errors found in reviewing NAP area requests, frequency of the error, and recommendation to avoid the error.

Infrequent Common Errors (Occurring Less Than 20 Percent of Cases and/or Revisions)	
Identified Error	What Should Have Been Done or What Should Have Happened?
Multiple unrelated natural disasters conditions are being submitting for area loss.	Review the disaster occurrence, delineate the area, and identify the crops that suffered more than a 35 percent loss. Review 1-NAP, paragraphs 100 and 107 to determine the disaster condition that actually caused the crops to trigger. Approved NAP crops in a defined NAP area with a qualifying loss because of natural disaster reasonably related to the basis of the area's approval may be considered for payment.
The same yield is being established for the irrigated and nonirrigated practices.	Documentation should be provided showing yields would be the same for that crop regardless whether it is irrigated or nonirrigated. Yield documentation or data that is available without regard to practice (blended yields) is insufficient to support establishing identical nonirrigated and irrigated county-expected yields according to 1-NAP, subparagraph 107 D.

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2 Errors in NAP Area Requests (Continued)

C
**Infrequent
 Common Errors
 (Continued)**

Infrequent Common Errors (Occurring Less Than 20 Percent of Cases and/or Revisions)	
Identified Error	What Should Have Been Done or What Should Have Happened?
Acreage reporting dates are being established before the final planting date.	Acreage reporting dates cannot be established before the final planting date. For NAP purposes, follow 2-CP and 1-NAP, paragraph 178, in establishing acreage reporting dates and planting periods. Crop acreage must be reported by the earlier of the final reporting date in 2-CP or 15 calendar days before onset of harvest.
Planting periods are being designated in the calendar year in which the crop is planted as opposed to when the crop will be harvested.	According to 1-NAP, Exhibit 2, planting periods should be established in the calendar year in which majority of the crop will be harvested. Planting periods should be established according to 1-NAP, subparagraph 178 C.
The acreage and production of all intended uses and practices of a crop in the defined area are not being summarized as 1 crop when determining area crop eligibility.	In determining eligibility, the acreage and production of all intended uses and practices of a crop in a defined area must be considered as one crop. The exception to that are seed crops which may qualify as separate crops according to 1-NAP, subparagraph 174 G, and small grain forages that qualify as a separate crop according to 1-NAP, paragraph 186.5
