



**AMERICAN AGRICULTURE.
STRONGER TOGETHER.**

**Specialty Crop Farm Bill Alliance
Farm Bill Policy Recommendations
119th Congress
August 5, 2025**

All Programs

A Single Definition of Specialty Crops for USDA Programs

The Specialty Crop Competitiveness Act of 2004 established new programs at USDA to meet the unique needs of specialty crops in critical areas such as research, trade, and regional market development and expansion. Subsequent farm bills have continued to improve and refine these programs to meet the unique needs of specialty crops.

These initiatives are chronically underfunded and oversubscribed. Although the OBBBA allocated significant new resources to these programs, those investments continue to be a small fraction of overall farm bill spending allocated to specialty crops. It is imperative that what resources are dedicated to specialty crops not be redirected to other crops or commodities by expanding or misinterpreting the definition of specialty crop.

Policy Recommendation – The SCFBA opposes any attempt to expand or misinterpret the definition of specialty crops beyond the commonly understood meaning set forth in the 2004 Act.

The Specialty Crop Competitiveness Act of 2004 defines specialty crop as fruits, vegetables, tree nuts, dried fruits, and nursery crops (including floriculture), and Congress should reaffirm that, whenever practicable, the Secretary should use this definition of specialty crops for USDA's programs and the delivery of services to specialty crop growers.

Title I Commodity Programs

Permanent Structure for Delivering Economic Assistance to Specialty Crop Growers

Although the SCFBA has chosen federally subsidized crop insurance to become the primary safety net for our growers in the United States (more details below), and reforming the crop insurance program to work better for specialty crops is a top priority for the SCFBA, there are times when USDA or Congress need to deliver economic assistance to broad categories of agricultural producers quickly. USDA offers a variety of programs to help farmers, ranchers, communities, and businesses that have been hard hit by natural disaster events and other economic challenges. Over time USDA and Congress have adjusted and refined how this economic aid is delivered to specialty crop growers.

Policy Recommendation – Congress should statutorily establish a default method for delivering direct economic assistance to specialty crop growers that includes the following elements:

- Payment limitations of not less than \$900,000.
- Exempt growers from AGI limitation if at least 75 percent of their income is derived from farming activities (i.e., the OBBBA version).
- Payments calculated based on a grower's individual aggregate specialty crop receipts.
- Allow growers to select the base year for calculating their payments from a predetermined selection of not less than three years.
- Require minimal paperwork and permit growers to self-attest under penalty of perjury (subject to potential future audit).

Tree Assistance Program (TAP)

The Tree Assistance Program (TAP) provides financial assistance to eligible orchardists and nursery tree growers to replant or rehabilitate eligible trees, bushes, and vines lost by natural disasters. TAP is administered by the Farm Service Agency (FSA). Eligible trees, bushes, and vines are those from which an annual crop is produced for commercial purposes. Nursery trees include ornamental, fruit, nut and Christmas trees produced for commercial sale. Trees used for pulp or timber are not eligible for TAP assistance.

The Bipartisan Budget Act of 2018 made several changes to TAP, including removing the per person and legal entity program year payment limitation ceiling of \$125,000. It also increased the acreage cap, and growers are eligible to be partly reimbursed for losses on up to 1,000 acres per program year, double the previous acreage. The 2018 Farm Bill increased the reimbursement amount for applicants who meet the definition of a beginning or veteran farmer or rancher, and the OBBBA increased coverage levels to 65 percent and adjusted the mortality threshold.

Policy Recommendation – Congress should provide additional flexibility for completing TAP-funded rehabilitation by extending the period of time from the existing 12 months to 24 months or as soon thereafter as is indicated to avoid risk of reinfection in the case of plant diseases.

Policy Recommendation – Cumulative total quantity of acres that can receive TAP payments for eligible participants may not exceed 1,000 acres annually. Congress should provide USDA with the authority to modify or waive the annual acreage cap under exigent circumstances, such as a natural disaster.

Policy Recommendation – Reset high-density stand after loss. TAP only permits producers to reset to their original amount and not the updated high-density planting that they put in after the original planting that TAP is based on. Producers need the ability to update stand to high-density planting after loss.

Policy Recommendation – The definition of "eligible orchardists" should be amended to state, "a person who produces annual or biennial crops from trees for commercial purposes."

Policy Recommendation – Rules should be adjusted to account for perennial crop plants with biennial production cycles, and reimbursable costs should be broadly defined to account for any costs incurred in the process of reestablishing, rehabilitating, and/or nurturing plants suffering from natural disasters back to a productive condition.

Policy Recommendation – Congress should permit FSA to extend replanting assistance for eligible trees, bushes, and vines that although still alive are no longer commercially viable – e.g., they no longer produce fruit.

Noninsured Crop Disaster Assistance Program (NAP)

NAP provides financial assistance to producers of non-insurable crops when low yields, loss of inventory, or prevented planting occur due to natural disasters. Since specialty crops continue to have limited access to risk management tools NAP has been a stopgap for many in our industry to have some type of coverage when disasters may occur. Until the full extent of crop insurance reform proposals have been implemented and specialty crop growers have meaningful access to affordable and effective crop insurance, NAP will remain an important tool for those growers and should be enhanced.

Policy Recommendation – Establish additional NAP coverage options addressing shallower losses, as well as optional units.

Title II Conservation

Working Lands Programs

The specialty crop industry produces hundreds of diverse crops in all regions of the country, each with their own unique production methods, structures, and markets. The diversity of specialty crop production in the United States presents many challenges when administering new conservation initiatives. However, specialty crop growers need additional tools to help them adapt and develop greater resiliency in their operations. Considering the wide diversity of needs across all specialty crop commodities, the SCFBA has focused on two resource needs that affect the greatest number of our growers: flood and drought.

Policy Recommendation – NRCS working lands programs should include the prevention of flood and drought as a priority, where appropriate.

NRCS Paperwork Burden

Producers find excessive paperwork a barrier to participation in NRCS programs. Efforts were made in the last two farm bills to reduce the paperwork burden on producers. Although these efforts have resulted in physical paper being reduced, the paperwork has been replaced by numerous electronic screens.

Policy Recommendation – Allow trade associations representing producers to undertake the paperwork functions (electronic screens) for their producers on a watershed or regional project basis.

Title III Agriculture Trade and Food Assistance Program

Increasing the competitiveness of the U.S. specialty crop industry is a founding principle of the SCFBA. U.S. specialty crop growers adhere to strict U.S. regulatory requirements and buyer's standards designed to protect the environment, provide consumers nutritious and healthy food, and safeguard workers. Maintaining these high U.S. standards is extremely costly. In addition, U.S. specialty crop producers pay some of the highest agricultural labor costs in the world. However, these investments are undermined globally when our foreign competitors benefit from lower levels of regulatory compliance and other associated costs and an overall significantly lower costs of production. Farm Bill programs must recognize this imbalance and provide non-distorting support in the areas of market development, research, innovation, and technology. This support should assist specialty crop producers to maintain competitiveness, offset the cost of production advantages in other countries, and ensure the continued existence of domestic food production.

Technical Assistance for Specialty Crops (TASC)

The Technical Assistance for Specialty Crops (TASC) program funds projects that address sanitary, phytosanitary, and technical barriers that prohibit or threaten the export of U.S. specialty crops. Eligible activities include seminars and workshops, study tours, field surveys, pest and disease research, and pre-clearance programs. Eligible crops include all cultivated plants and their products produced in the United States except wheat, feed grains, oilseeds, cotton, rice, peanuts, sugar, and tobacco. Awards are for a maximum of \$500,000 per year and for projects of up to five years.

The TASC program is intended to benefit an entire industry or commodity rather than a specific company or brand. U.S. non-profit, for-profit, and government entities are eligible to apply. Proposals may target individual countries or reasonable regional groupings of countries.

Policy Recommendation – Congress should provide not less than \$9 million annually to TASC.

Policy Recommendation – Congress should clarify that the TASC program should align with and use the definition of “specialty crops” from the the Specialty Crop Competitiveness Act of 2004, i.e., fruits, vegetables, tree nuts, dried fruits, and nursery crops (including floriculture).

Specialty Crop Competitiveness

Exports play a critical role in maintaining the competitiveness of those specialty crop sectors that are fortunate to produce more than can be consumed in the U.S. For those export-dependent commodities, the USDA Foreign Agricultural Service (FAS) and the Animal and Plant Health Inspection Service (APHIS) are critical to advancing the foreign market competitiveness of U.S. growers, as is the Office of the U.S. Trade Representative. It is these government agencies and their professional staff that represent the interests of U.S. growers, open markets and defend that access internationally. It is critical that USDA and USTR prioritize the competitiveness of U.S. specialty crop growers and that Congress utilize its oversight role to reinforce that mandate.

Policy Recommendation – Congress should require USDA and USTR to issue a report on the export competitiveness of specialty crops. In this report, special emphasis should be placed on those barriers to trade that limit the export competitiveness in specific markets and what steps

USDA and USTR will take in cooperation with specialty crop producers to successfully remove those barriers to trade, including timelines for action. A special call for comment, both public and from the Agricultural Trade Advisory Committee for Trade in Fruits and Vegetables, should be a condition of the report. (Note: Sens. Crapo and Wyden introduced a bill on this topic during the 118th Congress.)

Market Access Program (MAP)

Through the Market Access Program (MAP), FAS partners with U.S. agricultural trade associations, cooperatives, state regional trade groups and small businesses to share the costs of overseas marketing and promotional activities that help build commercial export markets for U.S. agricultural products and commodities.

MAP reaches virtually every corner of the globe, helping build markets for a wide variety of U.S. farm and food products. FAS provides cost-share assistance to eligible U.S. organizations for activities such as consumer advertising, public relations, point-of-sale demonstrations, participation in trade fairs and exhibits, market research, and technical assistance. When MAP funds are used for generic marketing and promotion, participants must contribute a minimum 10 percent match. For the promotion of branded products, a dollar-for-dollar match is required.

Members of the SCFBA receive approximately 25 – 30 percent of MAP funding allocated by the USDA, with the majority 70 – 75 percent going to non-specialty crops. Each year, more than 37 specialty crop organizations from around the country receive more than \$50 million of the \$200 million currently from this oversubscribed market development program. The OBBBA allocated a significant amount of new funding for USDA to carry out activities to encourage the accessibility, development, maintenance and expansion of commercial export markets for U.S. agricultural commodities.

Policy Recommendation – Congress should provide not less than \$400 million annually to MAP.

Title IV Nutrition Programs

Nine in ten Americans do not consume fruits and vegetables in the amounts recommended by the 2020 – 2025 Dietary Guidelines for Americans (DGA). Congress has an opportunity to structure Farm Bill nutrition programs to address diet-related disease by increasing consumption of fruits, vegetables, and tree nuts. Bolstering these programs both supports the nutritional needs of Americans and improves market opportunities for growers.

Procurement and Food Box Programs

USDA has a series of direct purchasing programs that aim to support market prices in and out of emergencies and provide domestically grown fruits and vegetables to food banks, schools and childcare centers, tribal governments, and other feeding sites. These programs include section 32; the Food Purchase and Distribution Program (FPDP); the USDA DOD Fresh Fruit and Vegetable Program; and USDA Foods, which provides food to the Emergency Feeding Assistance Program (TEFAP), the Food Distribution Program for Indian Reservations (FDIPR), the Commodity Supplemental Food Program, and some schools and childcare centers. USDA also implemented the Local Food Procurement Agreements,

Local Food for Schools, and the Farmers to Families Program, all of which were popular programs that were terminated for various reasons.

Policy Recommendation – In general, USDA purchasing programs should support grower resiliency, ensure recipients have access to a wide variety of specialty crops consistent with the Dietary Guidelines for Americans (DGA), and proactively address fruit and vegetable consumption shortfalls.

Policy Recommendation – For all of USDA's nutrition procurement programs, Congress should direct USDA to:

1. Conduct Solicitations using factors other than lowest-cost bid in solicitations, including best value trade-off and cost-plus.
2. Purchase a greater amount and wider variety of specialty crops to address the underconsumption of fruits, vegetables and tree nuts as recognized by the Center for Disease Control (CDC) and cited in the DGA.
3. Streamline barriers for vendors including, but not limited to, inspection at shipping and accepting food safety certifications beyond USDA Good Agricultural Practices (GAP).
4. Extend USDA food distribution programs to reputable nonprofits beyond the TEFAP system to ensure that hard-to-reach areas, including rural areas, have access to nutritious foods, including fruits, vegetables, and tree nuts.
5. USDA has broad authority to make purchases under Section 32, which has been underutilized, and USDA should conduct Section 32 purchases using all three original points of intent, consistent with current U.S. international trade policy: (a) encouraging the export of farm products through producer payments or other means; (b) encouraging the domestic consumption of farm products by diverting surpluses from normal channels or increasing their use by low-income groups; and (c) re-establishing farmers' purchasing power.

Policy Recommendation – Congress should allow states to reserve up to 20 percent of their TEFAP allocation for use within the USDA Department of Defense Fresh (DOD Fresh) Program to access a wide variety of U.S.-grown fresh produce of their choosing.

Policy Recommendation – Existing USDA procurement and distribution programs often inadvertently exclude a wide variety of U.S. grown fruits and vegetables, given their perishability and the technical nature of their supply chains. Any food box program must ensure a stand-alone option for fresh produce. (Additional commodities like dairy and meat could also enjoy a dedicated box which would ensure appropriate temperature controls and a more seamless experience for farmers, distributing agencies, and the end user.)

The Supplemental Nutrition Assistance Program (SNAP)

SNAP is the largest federal government program to address food insecurity and presents a significant opportunity to improve dietary quality for low-income Americans by increasing fruit, vegetable, and tree nut consumption.

To date, the Gus Schumacher Nutrition Incentive Program (GusNIP) is the only dedicated program to increase the buying power of SNAP participants for fruits and vegetables. First included in the 2014 Farm Bill to test whether providing incentives increased fruit and vegetable purchases and consumption, GusNIP has shown that SNAP incentive participants eat more fruits and vegetables than not only non-participating SNAP consumers, but all Americans. However, today, fewer than two percent of SNAP retailers offer SNAP incentives, falling short of our nation's goals to improve dietary quality.

Policy Recommendation – Congress should continue to invest in the GusNIP program, which pilots strategies to improve access to and consumption of fruits and vegetables, including the ten percent set-aside for Produce Prescriptions.

Further innovations are needed to create a dedicated fruit and vegetable benefit for SNAP participants modeled after the successful cash value benefit (CVB) in the WIC program. Operating as a fixed dollar amount set by the National Academy of Sciences, participants can select the fruit and vegetable of their choice, proving to be a flexible option across diverse cultures, seasons, and supply chain disruptions.

Policy Recommendation – Congress should direct USDA to explore innovative ways to promote consumption of fruits, vegetables, and tree nuts through online retail, including the integration with existing programs like GusNIP. With the elimination of SNAP-Ed, additional innovation will be needed to achieve consumption goals at the local level.

Fresh Fruit and Vegetable Program

The Fresh Fruit and Vegetable Program (FFVP) was originally piloted in the 2002 Farm Bill and quickly expanded to all states and territories due to its success and popularity. A USDA evaluation found that FFVP increases consumption among low-income students, helps reduce plate waste at school meals, and, most notably, can reduce obesity rates. The program is oversubscribed, with many more districts (all low-income) applying each year than funding made available (funded through a reservation of Section 32). With the additional awareness of the impact of diet on children through Make America Healthy Again efforts, the FFVP offers a turn-key and evidence-based solution to achieve the goal of reducing diet-related disease.

Policy Recommendation – Congress should make FFVP automatically available to any elementary school that has fifty percent or more of its students qualifying for free or reduced-price lunch.

Title VII Research

Advancing research and development activities to overcome existing and upcoming research challenges in specialty crop agriculture will require acceleration of novel, early-stage innovative agricultural research

with promising technology applications and products. Below represents the SCFBA focus for research in the next Farm Bill.

Specialty Crop Research Initiative (SCRI)

The purpose of the Specialty Crop Research Initiative (SCRI) program is to address the critical needs of the specialty crop industry by awarding grants to support research and extension that address key challenges of national, regional, and multi-state importance in sustaining all components of food and agriculture, including conventional and organic food production systems.

Policy Recommendation – Congress should reinstate the Secretary’s authority to waive the matching funds requirement.

SCRI Mechanization and Automation Fund

The availability and rising cost of labor are major limiting factors for specialty crop producers nationwide. Demographic and generational shifts have reduced the availability of agricultural labor, driving a dire need for more mechanization and automation within specialty crop agriculture. Developing these new forms of technology is therefore increasingly important with respect to successfully growing, harvesting, and handling specialty crops.

Policy Recommendation – Of the funds made available to SCRI in the OBBBA, Congress should allocate \$40 million in annual mandatory spending to the research and development of mechanized and automated tools and systems for specialty crops, provided that any unobligated funds set aside for this purpose return to SCRI for general use at the end of each fiscal year.

The new SCRI fund should include the following funding priorities:

1. Projects that increase the competitiveness of specialty crops.
2. Projects that create or improve cost-effective technologies to reduce a specialty crop grower’s manual labor requirements and increase the efficiency of crop production, resource management, harvesting, processing, postharvest technologies, and packaging through mechanization, automation, and other innovations and technologies.
3. Projects that increase adoption of mechanization and automation technologies by:
 - Emphasizing adoption drivers that could include but are not limited to connectivity, autonomy, reliability, durability, in-field validation, and cost-effectiveness.
 - Investing and developing human capital to increase the specialty crop sector’s capacity to work with new technologies, and to manage a more tech-focused farm workforce. (Innovations resulting from projects will significantly increase the resilience, economic sustainability, and impact on State and local economies of a specialty crop sector or sectors.)

4. Projects that accelerate automation and mechanization through prototype development, in-field trial testing, ongoing industry engagement, and rapid commercialization.

IR-4 Project

The IR-4 Project serves a critically important role for agriculture by facilitating the availability of needed pest management solutions for specialty crops. The private crop protection industry often focuses its product development efforts and resources on large acreage, major row crops where potential sales are significant. As a result, specialty crops can be left with few tools for effectively managing pests and the tools that are made available to specialty crops can lag as to the latest advances in crop protection. The IR-4 project aims to combat these market inefficiencies by advancing crop protection product registrations for the specialty crop sector.

Policy Recommendation – Congress should provide not less than \$25 million annually in mandatory funding for the IR-4 Project.

Title X Horticulture – Organics, AMS, APHIS

Specialty Crop Block Grant Program

The Specialty Crop Block Grant Program (SCBGP) was created to provide greater federal assistance to specialty crop producers by providing grants to state departments of agriculture to enhance the competitiveness of those crops. SCBGP funds can support a wide array of projects.

Policy Recommendation – Of the funds provided for the SCBGP in the OBBBA, not less than \$5 million should be reserved for multi-state projects each year.

Organics

In 2019, 58 percent of organic sales came from crops, led by vegetables and fruits (including berries and tree nuts) and represents \$9 billion in sales. With the growing importance of the organic production sector in specialty crops and increasing participation throughout the supply chain, the SCFBA continues to work with other stakeholders on a range of initiatives to improve the National Organic Program.

Policy Recommendation – Congress should establish a transparent process by which USDA solicits input directly from stakeholders every five years on what, if any, organic standards need updating. The agency should then publish a list of priorities for regulatory action and follow its existing process and procedures to execute on that plan.

Policy Recommendation – Both USDA and the National Organic Standards Board (NOSB) should consider the best available information – including scientific, consumer, and market data – when making organic policy decisions.

Domestic Promotion Activities

While individual producers may be successful at moving their product into the marketplace, creating the dynamic that expands the marketplace and encourages consumer commodity consumption is difficult given the fragmented nature of specialty crop production. Many domestic specialty crop products increasingly face competition from both less expensive imports and branded, highly refined manufactured products that can serve as “like” substitutes. Some have questioned whether USDA has statutory authority to create and operate a domestic promotion program to address these challenges.

Policy Recommendation – Congress should reaffirm that USDA has the statutory authority to conduct domestic promotion activities.

Mechanization and Automation Technology Deployment

Dependence on manual and hand labor in the specialty crop sector continues to be the predominate method to plant, monitor, harvest, and even package specialty crops. In fact, of the 20 most widely consumed fruits and vegetables in the United States, 17 still require hand harvesting. In almost all cases, hand harvesting results in higher grower production costs resulting in higher food prices for consumers compared to other food categories. In addition, domestic labor is increasingly limited due to an aging work.

When mechanized and automated solutions do arrive in the marketplace, they are often not adopted quickly as industry best practices because they are expensive, unproven or undertested, and require significant grower investment.

Policy Recommendation – Congress should direct USDA to utilize existing programs and authorities to assist specialty crop growers with the purchase of mechanized or automated solutions.

Title XI Crop Insurance

Some specialty crop growers have utilized crop insurance effectively for many years, and for those growers, the SCFBA focused its efforts on enhancements that would make existing policies more effective. Unfortunately, the vast majority of specialty crop growers in the United States cannot utilize crop insurance in a meaningful way. As a result, a large cross section of specialty crop growers operates without any federally supported safety net. Reforming crop insurance to work more effectively and affordably for all specialty crops has been the focus of the SCFBA’s effort to provide our growers with an affordable and effective safety net.

Systemic Enhancements

The following three proposed recommendations work together to establish a more fertile environment for producing crop insurance policies that are uniquely suited to the needs of specialty crop growers. (1) The establishment of an industry led advisory committee, (2) greater flexibility in the development of new policies for specialty crops, and (3) enhanced data collection regarding specialty crops.

Policy Recommendation – Establish a Specialty Crop Advisory Committee for Crop Insurance.

- The Specialty Crop Advisory Committee for Crop Insurance would supplement the expertise at Risk Management Agency (RMA), including for enhancing and improving existing crop insurance policies available to specialty crops, conducting outreach to specialty crop growers and affiliated groups, and having a formal role in the development of new crop insurance policies for specialty crops.
- Details of the Specialty Crop Advisory Committee for Crop Insurance should include:
 - Membership should represent a diversity of specialty crop commodities and the regions in which they're grown and include individuals with expertise in crop insurance for specialty crops. Membership on the Committee should include producers with experience with crop insurance and crop insurance professionals such as agents and underwriters familiar with specialty crop production.
 - The Committee would have direct influence over the development of new insurance policies for specialty crops, amendments to existing insurance policies for specialty crops, as well as RMA's outreach to and engagement with specialty crop growers.
 - The chair of Specialty Crop Advisory Committee would automatically serve on the Federal Crop Insurance Corporation's Board of Directors.
 - USDA's existing Specialty Crops Coordinator would serve as the RMA staff liaison to the Advisory Committee.

Policy Recommendation – Require enhanced flexibility in the application of 508(h) standards required to create new insurance policies for specialty crops.

- The application of statutory requirements related to data, actuarial soundness, and marketability, among others, can be subjective. RMA and the FCIC are accustomed to working with row crops, which have more uniform and transparent markets and a longer history of participation in the federal crop insurance program than specialty crops.
- Congress should require RMA and FCIC to exercise greater discretion and flexibility when evaluating the merits of newly proposed specialty crop insurance policies, guided by the Specialty Crop Advisor Committee for Crop Insurance.

Policy Recommendation – Enhance USDA's capacity to collect data that would be useful to the creation and administration of crop insurance policies for specialty crops.

- In addition to establishing an Advisory Committee and the enhanced flexibility for specialty crop insurance policy development, requiring USDA to acquire more and better data relevant to the creation and administration of specialty crop insurance policies

should result in greater availability for a greater number of individual specialty crop commodities.

- Conduct a pilot program to create a pricing library for agents and insurance providers using data from—AMS, NAP, existing insurance policies approved by the FCIC Board, land-grant colleges or universities and other institutions of higher education, grower boards or commissions, and other relevant sources.
- Establish a presumption that requires USDA RMA to use available data whenever possible when considering a new or expanded crop insurance policy for specialty crops. (Under current practice, RMA does not use data from neighboring counties, NAP, or even other existing comparable crop insurance policies.) The Specialty Crop Advisory Committee for Crop Insurance should have a formal role in evaluating and determining when and how to use existing data.
 - Under current practice, RMA will not use data from neighboring counties, NAP, or even other existing crop insurance policies.
 - Allow prices and yields used to establish coverage in other Federal crop insurance policies or from neighboring counties (when relevant) to be used as prices and yields for new or expanded policies.
 - Establish a process for records and acreage reports submitted by producers for NAP must be accepted as documentation for the requisite actual production history for other policies.

Whole Farm Revenue Insurance Program

Although often cited as the default revenue insurance plan for specialty crops, the existing program has limited utility for many specialty crop operations. The following enhancements would make the WFRP more affordable and effective for a wider range of specialty crop growers.

Policy Recommendation – Utilizing the language from HR 8467 (118th), clarify that WFRP is agnostic to what causes a coverable loss in revenue (other than one directly caused by the producer).

Policy Recommendation – Require the Secretary to review annually the merits of the revenue cap in the WFRP with the goal of its ultimate elimination. (This approach to eliminating the revenue cap should address concerns regarding the programs actuarial soundness and avoid CBO scoring a cost.)

Policy Recommendation – Allow WFRP to satisfy the requirement that a grower have an underlying policy for endorsements for things like Hurricane Insurance Protection-Wind Index (HIP-WI). (Current practice requires growers to have additional Catastrophic or Multi-Peril coverage in addition to WFRP.)

Policy Recommendation – Restrict the ability of Approved Insurance Providers (AIPs) to alter the revenue guarantee.

Policy Recommendation – Increase the existing 35 percent year-over-year limit on growth in covered acreage. (Note: this limits how many acres a grower can insure each year. If WFRP is expected to be the default safety net for most specialty crop growers, the growth of its use should not be constrained.)

Policy Recommendation – Clarify diversification requirements by requiring the RMA and approved insurance providers to treat different cultivation cycles of a single crop, such as peppers, as separate crops to recognize the difference in perils at different periods of the year for purposes of calculating the diversification premium discount.

Policy Recommendation – Provide additional educational and training opportunities to approved insurance providers and insurance agents.

Policy Recommendation – Congress should codify recent enhancements to WFRP that were made administratively by USDA, including:

- Allowing producers to purchase catastrophic coverage level policies for individual crops with WFRP.
- Expanding yield history to a 10-year maximum (from 4 years) for all crops not covered by another federal crop insurance policy.
- Making the policy more affordable for single commodity producers.
- Allowing producers to customize their coverage by choosing whether WFRP will consider other federal crop insurance policies as primary insurance when calculating premium and revenue to count during claim time.

Other Revenue Insurance Policies

Policy Recommendation – Congress should clarify that ALL revenue insurance policies should be agnostic to what causes a loss in revenue (other than one directly caused by the producer), Congress should clarify that all revenue insurance plans are likewise agnostic on the cause of loss.

Prevented Planting

Few specialty crops currently have access to prevented planting crop insurance coverage, and what prevented planting coverage is available does not account for the significant capital expenditures necessary for the production of many specialty crops that's incurred prior to the crop being planted.

Policy Recommendation – Congress should require RMA to make “Prevented Planting” coverage to include more specialty crops, including the cost of temporary infrastructure installed in the field prior to a crop being planted (e.g., plastics and certain types of temporary hoop houses).

Enhancements to Existing Insurance Products

Many specialty crop producers have experience crop insurance policies with high premium costs with coverage levels and corresponding payouts that are too low. As coverage levels increase so too do premium rates, at some point producers decide to self-insure. Pricing accuracy needs to be improved, and varietal development needs to be accelerated.

Policy Recommendation – Allow for Optional Units to section out fields and account for different weather events in different field locations.

Policy Recommendation – Remove harvest costs from the payment, which should help lower premium costs. (As an example, while the Strawberry Production and Revenue History program is not perfect, one useful feature to replicate elsewhere is that harvest costs are removed.)

Policy Recommendation – Prices should be county-specific for RMA programs to account for the differences in seasons and marketing windows.

Policy Recommendation – Higher levels of buy-up coverage for existing products are needed as well as encouraging RMA to be quicker to price policies for emerging varieties.

Research and Development Directives

Policy Recommendation – Mandate that USDA RMA initiate “research and development directives” for specific endorsements and index programs, including:

- Abnormal amounts of rainfall, extreme heat, wildfire, hail, drought, hurricanes (standalone HIP-WI), and other events, and
- An index policy to insure crops during the growing season against losses due to frost, freeze, or cold weather events.

RMA Outreach to Specialty Crop Growers

RMA was mandated in the 2018 Farm Bill to engage in greater outreach to specialty crop growers to develop a greater number of policies covering specialty crop production. Outreach efforts have been uneven and insufficient resulting in no meaningful increased availability of crop insurance policies to specialty crop producers. RMA relies on crop insurance agents to “sell” crop insurance policies and engage with growers, but this model only works if there are crop insurance policies to sell.

Policy Recommendation – Require RMA, working with the Specialty Crop Advisory Committee for Crop Insurance, to conduct better outreach to specialty crop growers in all regions of the country, including an equitable outreach program in all States that engages specialty crop producers, so producers understand how to currently access and use new and existing program.