

# THE RULE MAKING PROCESS FOR THE 2014 FARM BILL

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## Regulation Process Basics

### General Steps:

- 1) Agency writes the regulation
- 2) Goes through Departmental clearance process
- 3) Goes to the Office of Management and Budget (OMB) for inter-agency review and clearance process
- 4) Federal Register for public review and comment
- 5) Congressional review
- 6) Final rule published in the Federal Register



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## Farm Programs Process

- “Expedited Rulemaking Authority” for Title I Commodity Programs and the new crop insurance programs—Supplemental Coverage Option (SCO) and STAX.
- Permits Farm Service Agency (FSA) to bypass certain steps or requirements, such as public notice and comment, Congressional review, etc.
- Secretary instructed to have regulations out within 90 days but rarely accomplished



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## Farm Programs Process

- Write the regulations—the rules for program operation
- Write the software that will operate the programs and make payments
- Write the handbooks and field staff guidance
- Training field staff



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## Farm Programs Process

- Regulations still go through Departmental review and some level of review at OMB
- Software has become an extremely difficult undertaking, particularly as programs become more complex
- Providing proper explanation, guidance and training for field staff can also be difficult and time consuming



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## Complicating Factors

- Program complexity: price-based program and two versions of revenue program
- Requires multiple decisions by farmers and landowners
- Information technology (IT), budgetary and staffing challenges
- Timing issues with planting and harvest dates for various commodities



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## What To Do in the Meantime

- Strong interest (concern?) from farmers, crop insurance agents and others—particularly about the decisions and what it means
- Parallel education process:
  - 1) Build understanding—explaining the bill's provisions and programs
  - 2) Help the decisions—from tools to analysis-based guidance



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## MORE INFORMATION ON 2014 FARM BILL

farmdoc Daily: <http://www.farmdocdaily.illinois.edu/>

March 5, 2014 webinar on Title I of the Farm Bill



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# QUESTIONS?

THANK YOU.

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