The 2014 Farm Bill: Guiding a Client through the New Law

Bill Bridgforth
Ramsay, Bridgforth, Robinson & Raley LLP, Pine Bluff, Arkansas.

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Agricultural Act of 2014

Landowner Elections
Under 2014 Farm Bill

The 2014 Farm Bill: Guiding a Client through the New Law
Agricultural Act of 2014 Landowner Elections

1-Time Election to Reallocation Base Acres

- Reallocation of Base Acres
  - than generic base acres, as in effect on September 30, 2013, among the covered commodities (does not include cotton) planted on the farm at any time during the 2009 through 2012 crop years.
  - The reallocation shall be in proportion to the ratio of the 4-year average of the acreage planted on the farm to each covered commodity during 2009 through 2012 to the average planted to all covered commodities for each crop year.
  - Include any crop year in which the covered commodity was not planted.
  - Generic base acres are retained and may not be reallocated.


Base Reallocation Example:

<table>
<thead>
<tr>
<th>Covered Commodity</th>
<th>Cotton</th>
<th>Rice</th>
<th>Corn</th>
<th>Soybeans</th>
<th>Wheat</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2013 Base Acres</td>
<td>200</td>
<td>150</td>
<td>100</td>
<td>200</td>
<td>150</td>
<td>800</td>
</tr>
<tr>
<td>2009-2012 Planted Acres</td>
<td>0</td>
<td>150</td>
<td>300</td>
<td>350</td>
<td>0</td>
<td>800</td>
</tr>
<tr>
<td>Covered Commodity Planted as Percentage of Total Covered Commodities Planted</td>
<td>20.75%</td>
<td>37.50%</td>
<td>43.75%</td>
<td>0%</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Generic Base Acres Retained</td>
<td>200</td>
<td>150</td>
<td>100</td>
<td>200</td>
<td>150</td>
<td>800</td>
</tr>
<tr>
<td>Base Acres if 2013 Base Acres are Retained</td>
<td>200</td>
<td>112.5</td>
<td>225</td>
<td>262.5</td>
<td>0</td>
<td>800</td>
</tr>
<tr>
<td>Base Acres if 2013 Base Acres are Reallocated</td>
<td>200</td>
<td>112.5</td>
<td>225</td>
<td>262.5</td>
<td>0</td>
<td>800</td>
</tr>
</tbody>
</table>

1-Time Election to Update Payment Yields, on a covered commodity by covered commodity basis for purposes of calculating PLC Payments

- of the average of the yield per planted acre for the crop of the covered commodity on the farm for the 2008 through 2012 crop years, excluding any crop year in which the covered commodity was not planted.
  - 75% of the average of the 2008 through 2012 county yield for the commodity, you may assign a yield for that crop year equal to 75% of the average of the 2008 through 2012 county yield.
  - Update even if ARC Coverage is selected.

Payment Yield Update

- Certification of yield
  - Verifications, the owner must have documentary evidence to support the certified yield.
- The regulations provide that documentary evidence includes:
  - (1) production approved by the county committee for some other FSA program purposes;
  - (2) commercial receipts;
  - (3) settlement sheets;
  - (4) warehouse ledger sheets;
  - (5) elevator receipts or load summaries, supported by other evidence showing disposition, as under other provisions of this subpart of this part of this part of this Act; and
  - (6) other production evidence determined acceptable by the Deputy Administrator.
- Production evidence must show:
  - (1) the producer’s name,
  - (2) the commodity,
  - (3) the buyer or name of storage facility,
  - (4) the date of transaction or delivery, and
  - (5) the quantity.

Producer Elections
Under 2014 Farm Bill

- **ALL** of the producers on a farm shall make a 1-time irrevocable election to receive PLC payments on a covered commodity by covered commodity basis or ARC payments.
- If the producers on a farm elect to receive ARC payments, the producers on the farm shall unanimously select whether to receive ARC payments on county coverage applicable on a covered commodity by covered commodity basis or individual coverage applicable to all of the covered commodities on the farm.
- If the producers on a farm fail to make a unanimous election for the 2014 crop year, the Secretary shall not make any PLC or ARC payments with respect to the farm for the 2014 crop year and the producers on the farm shall be deemed to have elected PLC payments for all covered commodities on the farm for the 2015 through 2018 crop years.
### Agricultural Act of 2014 Important Dates:

- **Sept. 29, 2014 to Feb. 27, 2015:**
  - Land owners may visit their local Farm Service Agency office to update yield history and/or reallocate base acres.

- **Nov. 17, 2014 to March 31, 2015:**
  - Producers make a one-time election of either ARC or PLC for the 2014 through 2018 crop years.

- **Mid-April 2015 through summer 2015:**
  - Producers sign contracts for 2014 and 2015 crop years.

- **October 2015:** Payments for 2014 crop year, if needed.

  *Source: FSA News Release No. 0161.14*

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### Agricultural Act of 2014

#### PRICE LOSS COVERAGE

- Essentially a counter-cyclical payment.
- Decoupled payment.
- Secretary shall make price loss coverage payments for a covered commodity if the Secretary determines that –
  - The effective price for the covered commodity for the crop year, is less than
  - The reference price for the covered commodity for the crop year.
Agricultural Act of 2014 Price Loss Coverage

Price Loss Coverage payment for a covered commodity is made when the effective price for the covered commodity is LESS than the reference price for the covered commodity.

- Effective Price for a crop year is the HIGHER of the national average price received by producers during the 12-month marketing year for the covered commodity or the Loan Rate.
- Reference Price is set in the Farm Bill like the target price for CC Payments was in 2008 Farm Bill.

- Reference Price for Rice - $14.00 per hundredweight
- Reference Price for Corn - $3.70 per bushel
- Reference Price for Wheat - $5.50 per bushel
- Reference Price for Grain Sorghum - $3.95 per bushel
- Reference Price for Soybeans - $8.40 per bushel

Amount of Price Loss Coverage Payment equals the Payment Rate times the Payment Yield times the Payment Acres.

- The Payment Rate is the difference between Reference Price and Effective Price (higher of NAMP and Loan Rate).
- The Payment Yield is the counter-cyclical payment yield for the covered commodity under 2008 Farm Bill or updated yield if landowner elects to update (90% of 2008-2012 average).
- The Payment Acres equal 85% of base acres of the covered commodity and generic base attributed to the covered commodity.

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Agricultural Act of 2014 Price Loss Coverage

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PLC Example for Rice

<table>
<thead>
<tr>
<th>Assumed 2014 National Average Market Price for Rice</th>
<th>$13.42/cwt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference Price for Rice</td>
<td>$14.00/cwt</td>
</tr>
<tr>
<td>PLC Payment Rate based on assumed NAMP of $13.42/cwt</td>
<td>$0.58/cwt</td>
</tr>
<tr>
<td>Payment Yield on Hypothetical Farm</td>
<td>55.0 cwt</td>
</tr>
<tr>
<td>Base Acres of Rice on Hypothetical Farm</td>
<td>1,000 base acres</td>
</tr>
<tr>
<td>Payment Acres on Hypothetical Farm</td>
<td>1,000 x 0.85 = 850 acres</td>
</tr>
<tr>
<td>PLC Payment on Hypothetical Farm if NAMP is $13.65</td>
<td>$0.58 x 55.0 x 850 = $27,115</td>
</tr>
</tbody>
</table>
The 2014 Farm Bill: Guiding a Client through the New Law

Agricultural Act of 2014

Agricultural Risk Coverage
(County Coverage)

Agricultural Act of 2014
Agricultural Risk Coverage
County Coverage

- Alternative to receiving price loss coverage payments for a covered commodity.
- ARC is a revenue based program.
- County Coverage or Individual Coverage option.

Agricultural Act of 2014
Agricultural Risk Coverage
County Coverage

- ARC payments are to be made on a covered commodity when the “actual crop revenue” is less than the “agricultural risk coverage guarantee”.
- “Actual crop revenue” is the product of:
  - The actual average county yield per planted acre for the covered commodity; and
  - The higher of the national average market price received by producers during the 12-month marketing year or the national average loan rate for a marketing assistance loan.
### Agricultural Act of 2014

**Agricultural Risk Coverage**

**County Coverage**

- ARC payments are to be made on a covered commodity when the “actual crop revenue” is less than the “agricultural risk coverage guarantee”.
  - “Agricultural risk coverage guarantee” is 86 percent of the benchmark revenue.
  - Benchmark revenue is the product of:
    - The average historical county yield for the most recent five crop years, excluding the crop years with the highest and lowest yields; and
    - The national average market price for the most recent five crop years, excluding the crop years with the highest and lowest prices.

- The payment rate for a covered commodity, in the case of county coverage is be equal to the lesser of:
  - The amount by which the agricultural risk coverage guarantee (86% of Benchmark) exceeds the actual crop revenue; or
  - 10 percent of the benchmark revenue.

### Amount of ARC Payments

- The amount of the agricultural risk coverage payment for the crop year shall be the product of the payment rate and the payment acres.
  - Payment acres for county coverage is 85% of base acres of the covered commodity, including generic base acres attributed to the covered commodity.
Agricultural Act of 2014
Agricultural Risk Coverage

COUNTY COVERAGE

ARC EXAMPLE

(Corn)

| Assumed Olympic Average County Yield | $155 |
| Assumed Olympic Average Market Price | $5.30 |
| ARC Benchmark Revenue (155 x $5.30 = $821.50) | $821.50 |
| ARC Guarantee (86% Benchmark Revenue) | $706.49 |
| Assumed Actual County Yield | 163 |
| Assumed National Average Market Price | $3.84 |
| Actual County Revenue (163 x $3.84 = $625.92) | $625.92 |
| ARC Guarantee minus Actual County Revenue | $80.57 |
| 85% Adjustment | |
| County Coverage ARC Payment per Base Acre | $68.48 |

Under this scenario there would be no PLC payment for corn as National Average Market Price was greater than the Reference Price for corn.

Agricultural Risk Coverage (Individual Coverage)
Agricultural Act of 2014
Agricultural Risk Coverage
Individual Coverage

Individual coverage ARC is a whole farm revenue based program.

Unlike county coverage ARC which can be selected on a covered commodity-by-covered commodity basis, individual ARC applies to **ALL** covered commodities on the farm.

Individual ARC payments are to be made when actual crop revenue is less than the agricultural risk coverage guarantee.

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**Individual coverage ARC** is a whole farm revenue based program.

Unlike county coverage ARC which can be selected on a covered commodity-by-covered commodity basis, individual ARC applies to **ALL** covered commodities on the farm.

Individual ARC payments are to be made when actual crop revenue is less than the agricultural risk coverage guarantee.

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**Actual crop revenue** is based on the producer’s share of all covered commodities planted on all farms for which individual coverage has been selected is determined as follows:

- For each covered commodity, determine the product of the total production of the covered commodity on such farms and the higher of the national average market price received by producers during the 12-month marketing year or the national average loan rate for a marketing assistance loan;
- Total the amount determined for each covered commodity;
- Divide the total by the total planted acres of all covered commodities on such farms.

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**Agricultural risk coverage guarantee** is 86 percent of the benchmark revenue.

- Benchmark revenue is based on the producer’s share of all covered commodities planted on all farms for which individual coverage has been selected is determined as follows:
  - The yield per planted acre for the covered commodity on such farms, and
  - The national average market price received by producers during the 12-month marketing year;
- For each covered commodity, the average of the revenues determined for the most recent five years excluding each crop year with the highest and lowest revenues.
- The sum of the amounts determined for all covered commodities on such farms, but adjusted to reflect the ratio between to total number of acres planted on such farms to a covered commodity and the total number of acres of all covered commodities planted on such farms.
The payment rate for a farm, in the case of individual coverage, shall be equal to the lesser of:

- The amount by which the agricultural risk coverage guarantee (86% of Benchmark) exceeds the actual crop revenue; or,
- 10 percent of the benchmark revenue.

Amount of ARC Payments:

- The amount of the individual ARC payment for the crop year shall be the product of the payment rate and the payment acres.
- Payment acres for individual coverage is 65% of base acres of covered commodities on all farms enrolled in individual ARC, including any generic base acres attributed to a covered commodity on said farms.
### ARC Individual Coverage Example

**Assumptions:**

Producer A has an interest in two (2) farms for which individual coverage ARC was selected.

FSN 111 consists of 150 cropland acres. There are 100 base acres of rice and 50 base acres of soybeans on FSN 111. Producer A’s interest in FSN 111 is 100%. Producer A will plant 100 acres of rice and 50 acres of soybeans on FSN 111 in 2014.

FSN 222 consists of 350 cropland acres. There are 100 base acres of rice, 100 base acres of corn, and 150 base acres of soybeans on FSN 222. Producer A’s interest in FSN 222 is 100%. Producer A will plant 100 acres of rice, 175 acres of corn, and 75 acres of soybeans on FSN 222 in 2014.

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### Calculation of Benchmark Revenue

#### Step 1: Determine Olympic Average Revenue for Each Covered Commodity Planted on Farms in which Producer A has an interest on which Individual ARC was selected.

**SOYBEANS**

<table>
<thead>
<tr>
<th>Crop Year</th>
<th>Assumed Yield (bu./acre)</th>
<th>National Average Market Price</th>
<th>Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>52</td>
<td>$9.59</td>
<td>$499</td>
</tr>
<tr>
<td>2010</td>
<td>45</td>
<td>$11.30</td>
<td>$509</td>
</tr>
<tr>
<td>2011</td>
<td>41</td>
<td>$12.50</td>
<td>$513</td>
</tr>
<tr>
<td>2012</td>
<td>49</td>
<td>$14.40</td>
<td>$706</td>
</tr>
<tr>
<td>2013</td>
<td>53</td>
<td>$13.00</td>
<td>$689</td>
</tr>
</tbody>
</table>

**Olympic Average Revenue for Soybeans:** $570

(Excludes High and Low. National Average Market Prices are estimates and may not be actual figures used by USDA in calculating ARC payments.)

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#### CORN

<table>
<thead>
<tr>
<th>Crop Year</th>
<th>Assumed Yield (bu./acre)</th>
<th>National Average Market Price</th>
<th>Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>167</td>
<td>$3.70 (Ref. Price)</td>
<td>$618</td>
</tr>
<tr>
<td>2010</td>
<td>175</td>
<td>$5.18</td>
<td>$907</td>
</tr>
<tr>
<td>2011</td>
<td>163</td>
<td>$6.22</td>
<td>$1,014</td>
</tr>
<tr>
<td>2012</td>
<td>180</td>
<td>$6.89</td>
<td>$1,240</td>
</tr>
<tr>
<td>2013</td>
<td>182</td>
<td>$4.46</td>
<td>$812</td>
</tr>
</tbody>
</table>

**Olympic Average Revenue for Corn:** $911

(Excludes High and Low – Reference Price used for 2009 as NAMP was less than Reference Price. National Average Market Prices are estimates and may not be actual figures used by USDA in calculating ARC payments.)
**Agricultural Act of 2014**

**Agricultural Risk Coverage**

**ARC Individual Coverage Example**

**Calculation of Benchmark Revenue**

**Step 1:** Determine Olympic Average Revenue for Each Covered Commodity Planted on Farms in which Producer A has an interest on which Individual ARC was selected.

<table>
<thead>
<tr>
<th>Year</th>
<th>Assumed Yield (cwt)/acre</th>
<th>National Average Market Price (Est.)</th>
<th>Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>65.75</td>
<td>$14.40</td>
<td>$918.00</td>
</tr>
<tr>
<td>2010</td>
<td>37.65</td>
<td>$14.00 (Ref. Price)</td>
<td>$527.00</td>
</tr>
<tr>
<td>2011</td>
<td>58.48</td>
<td>$14.20</td>
<td>$830.00</td>
</tr>
<tr>
<td>2012</td>
<td>64.25</td>
<td>$15.00</td>
<td>$964.00</td>
</tr>
<tr>
<td>2013 (Projected/Estimated NAMP)</td>
<td>72.28</td>
<td>$15.40</td>
<td>$1,113.00</td>
</tr>
</tbody>
</table>

Olympic Average Revenue for Rice

(Excludes High and Low – Reference Price used for 2010 as NAMP was less than Reference Price. National Average Market Prices are estimates and may not be actual figures used by USDA in calculating ARC payments.)

**ARC Individual Coverage Example**

**Calculation of Benchmark Revenue**

**Step 2:** Total Benchmark Revenue for Each Covered Commodity and Adjust Based on % of Planted Acres

<table>
<thead>
<tr>
<th>Crop</th>
<th>2014 Planted Acres</th>
<th>Percent of Total Planted Acres</th>
<th>Olympic Avg. Revenue</th>
<th>Benchmark Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soybeans</td>
<td>175</td>
<td>35.0%</td>
<td>$570</td>
<td>$200</td>
</tr>
<tr>
<td>Corn</td>
<td>125</td>
<td>25.0%</td>
<td>$911</td>
<td>$228</td>
</tr>
<tr>
<td>Rice</td>
<td>200</td>
<td>40.0%</td>
<td>$904</td>
<td>$362</td>
</tr>
<tr>
<td>Totals</td>
<td>500</td>
<td>100%</td>
<td>$790</td>
<td></td>
</tr>
</tbody>
</table>

**ARC Individual Coverage Example**

**Calculation of Actual Revenue**

**Step 3:** Calculate Actual Revenue and Adjust for % of Covered Commodity to Total Planted Acres

<table>
<thead>
<tr>
<th>Crop</th>
<th>Assumed 2014 Marketing Year Average Price (cwt/acre)</th>
<th>Assumed 2014 Actual Yield</th>
<th>Planned Acres</th>
<th>Revenue Adjusted to Total Planted Ac...</th>
<th>Actual Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Soybeans</td>
<td>$10.97</td>
<td>50</td>
<td>175</td>
<td>10.4%</td>
<td>$170</td>
</tr>
<tr>
<td>Corn</td>
<td>$3.84</td>
<td>172</td>
<td>120</td>
<td>20.8%</td>
<td>$40.60</td>
</tr>
<tr>
<td>Rice</td>
<td>$13.42</td>
<td>65.5</td>
<td>200</td>
<td>40.5%</td>
<td>$352</td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>500</td>
<td>100%</td>
<td>$709</td>
</tr>
</tbody>
</table>
**Agricultural Act of 2014**

**Agricultural Risk Coverage**

<table>
<thead>
<tr>
<th>ARC Individual Coverage Example Calculation of ARC Payment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 4: Calculate ARC payment</td>
</tr>
<tr>
<td>2014 Benchmark Revenue</td>
</tr>
<tr>
<td>2014 ARC Guarantee (86% of Benchmark)</td>
</tr>
<tr>
<td>2014 Actual Revenue</td>
</tr>
<tr>
<td>2014 ARC Payment Rate</td>
</tr>
<tr>
<td>Total Base Acres</td>
</tr>
<tr>
<td>Base Payment Acres (85% of Base)</td>
</tr>
<tr>
<td>2014 ARC Payment</td>
</tr>
</tbody>
</table>

2014 Benchmark Revenue: $790

2014 ARC Guarantee (86% of Benchmark): $679

2014 Actual Revenue: $709

2014 ARC Payment Rate: $0

Total Base Acres: 500

Base Payment Acres (85% of Base): 325

2014 ARC Payment: 325 acres x $0/acre = $0.00

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**ARC and PLC Producer Webtools**

1. National Association of Agricultural and Food Policy led by the Food and Agricultural Policy Research Institute (FAPRI) at the University of Missouri, and the Agricultural and Food Policy Center (AFPC) at Texas A&M University
   - https://usda.afpc.tamu.edu/

2. National Coalition for Producer Education (NCPE), led by the University of Illinois
   - http://fsa.usapas.com/

3. FSA Website
   - www.fsa.usda.gov

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**Agricultural Act of 2014**

**Cotton Provisions**
Cotton Transition Payment

- For 2014 and possibly 2015, the Secretary shall provide transition assistance to producers on a farm for which cotton base acres were in existence for the 2013 crop year.
- In 2014, payment is based on 60% of cotton base acres on the farm for 2013 crop year.
- In 2015, payment is based on 33.5% of cotton base acres on the farm for 2013 crop year if the farm is located in a county in which STAX is not available for 2015 crop year.

Cotton base acres become “generic base acres”

- made with respect to generic base acres planted to a covered commodity for the crop year.
- According to Farm Bill, generic base acres are allocated to a covered commodity in the following manner:
  - If a single covered commodity is planted and the total planted acres exceeds the generic base acres on the farm, the generic base acres are attributed to the covered commodity in an amount equal to the number of generic base acres.
  - If multiple covered commodities are planted and the total number of acres planted to all covered commodities exceeds the number of generic base acres, the generic base acres are attributed to each of the covered commodities on a pro rata basis.
- Regulations have not been issued so need to use USDA interpretation.

Example of Attribution of Generic Base Acres – Farm on which a single covered commodity is planted (based on strict interpretation of statutory language).

<table>
<thead>
<tr>
<th></th>
<th>Generic Base</th>
<th>Corn</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 Base Acres</td>
<td>200</td>
<td>100</td>
<td>300</td>
</tr>
<tr>
<td>2014 Planted Acres</td>
<td>Cotton</td>
<td>Corn</td>
<td>200</td>
</tr>
<tr>
<td>2014 Planted Acres</td>
<td>75</td>
<td>125</td>
<td>200</td>
</tr>
<tr>
<td>Generic Base Attributed</td>
<td>100%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2014 Effective Base Acres</td>
<td>200</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2014 Payment Acres</td>
<td>0</td>
<td>170</td>
<td>170</td>
</tr>
</tbody>
</table>
Example of Attribution of Generic Acres – Farm on which multiple covered commodities are planted (based on strict interpretation of statutory language).

<table>
<thead>
<tr>
<th></th>
<th>Generic Base</th>
<th>Corn</th>
<th>Soybeans</th>
<th>Rice</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014 Base Acres</td>
<td>100</td>
<td>100</td>
<td>0</td>
<td>100</td>
<td>300</td>
</tr>
<tr>
<td>2014 Planted Acres</td>
<td>50</td>
<td>100</td>
<td>75</td>
<td>75</td>
<td>300</td>
</tr>
<tr>
<td></td>
<td>Cotton</td>
<td>Corn</td>
<td>Soybeans</td>
<td>Rice</td>
<td></td>
</tr>
<tr>
<td>Generic Base Attributed</td>
<td>40</td>
<td>35</td>
<td>30</td>
<td></td>
<td>105</td>
</tr>
<tr>
<td>2014 Effective Base Acres</td>
<td>0</td>
<td>140</td>
<td>30</td>
<td>130</td>
<td>300</td>
</tr>
<tr>
<td>2014 Payment Acres</td>
<td>119</td>
<td>25.5</td>
<td>110.5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Cotton Transition Payment

- Amount of payment for 2014
  - Payment equals 5.4 cents x 2013 base acres of cotton times the direct payment yield for cotton under 2008 Farm Bill.
  - Example: Assume farm had 250 base acres of cotton and a direct payment yield of 850 lbs. Cotton Assistance Payment for 2014 will be: 250 x 850 lbs. x $0.054 = $11,475.00.
  - Cotton Assistance Payment will be made after October 1 of the calendar year in which the crop of cotton is harvested.
  - Subject to separate payment limit of $40,000 per individual or legal entity.

Cotton Transition Assistance Payment

- Amount of payment for 2015 (if STAX is not available in county; if STAX is available, no Transition Payment)
  - Payment equals 3.3 cents x 2013 base acres of cotton times the direct payment yield for cotton under 2008 Farm Bill.
  - Example: Assume farm had 250 base acres of cotton and a direct payment yield of 850 lbs. Cotton Assistance Payment for 2015 will be: 250 x 850 lbs. x $0.033 = $7,012.50.
  - Cotton Assistance Payment will be made after October 1 of the calendar year in which the crop of cotton is harvested.
  - Subject to separate payment limit of $40,000 per individual or legal entity.
Agricultural Act of 2014

Disclaimer:

- Regulations implementing the Agricultural Act of 2014 have not been issued by USDA.
- Presentation is based upon our current understanding of Act and is subject to change based upon interpretation and implementation of Act.

QUESTIONS?

William C. Bridgforth
billbridgforth@ramsaylaw.com

David R. Bridgforth
dbridgforth@ramsaylaw.com

Ramsay, Bridgforth, Robinson and Raley LLP
Post Office Box 8509
Pine Bluff, Arkansas 71611
(870) 535-9000