



January 27, 2026

Alex Sereno, Director, Program Administration and Standards Division
Risk Management Agency
U. S. Department of Agriculture
1400 Independence Avenue
SW Room 0801-South Building
Washington, DC 20250

RE: Docket ID: FCIC-25-0068

These comments are submitted on behalf of the more than 200,000 family farmer and rancher members of National Farmers Union (NFU). We appreciate the continued work of the U.S. Department of Agriculture (USDA) and the Federal Crop Insurance Corporation (FCIC) to expand and improve risk management options. Most of the changes set to be implemented through the Expanding Access to Risk Protection (EARP) rule of November 28, 2025, will provide greater flexibility and resources to crop insurance users, as directed by Public Law 119-21. **However, we strongly oppose the provision to eliminate buy-up coverage on prevented planted acres.**

The ability to increase protection against prevented planting losses is an important option for many farmers. The prevented plant buy-up option gives farmers a chance to stay in business even when extremely wet or otherwise inclement weather keeps them out of their fields during the planting season.

The rationale offered for the decision to remove buy-up coverage in section VI of the EARP rule is troubling. Since the rise of crop insurance as a broadly adopted risk management tool in the 1990s, policy makers have steadily improved the program so that farmers and ranchers have better tools to protect against losses. The EARP rule cites the passage of ad hoc disaster bills as a reason to eliminate the buy-up option for prevented planting coverage, but better crop insurance options and standing disaster programs are needed to prevent the need for ad hoc disaster programs in the first place.

NFU's grassroots, member-driven policy supports stronger and forward-thinking policies that consider the potential for adverse weather and market failures. There should be less emphasis on temporary assistance instead of greater reliance upon it, which this rule promotes. Unlike crop insurance, emergency programs often provide help long after the loss occurs and cannot be used for business planning decisions because they rely upon special actions by Congress or the federal government. Furthermore, this unprompted decision could not come at a worse time as Farmers Union members across the country

are feeling the ill effects of tariffs, high input costs, and low commodity prices. Now is not the time to eliminate risk management options for family farmers and ranchers.

We strongly urge USDA to reverse the decision in section of VI of the EARP rule and the department should reinstate the prevented plant buyup option in the 2027 crop year.

If you have any questions or would like to further discuss these comments, please contact Mike Stranz, NFU Vice President of Advocacy, at mstranz@nfu.org or 202-554-1600. Thank you for your consideration of this important matter.

Sincerely,



Rob Larew
President