

# **Food Security Act (FSA)**

## **Compliance Review**

### **2007 Report**

**March, 2008**

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## **Food Security Act (FSA) Compliance Review Year 2007 Summary of Findings Report**

### **Background:**

The Food Security Act of 1985 requires NRCS to identify random tracts for States to review for compliance to highly erodible land (HEL) and wetland (WET) conservation practices. The random tracts review list for the States/counties are selected from the Farm Service Agency (FSA) database (KCMO). The query to select tracts appropriate for the review was as follows:

1. All tracts where 'FSA HEL' or 'Wetlands' designations are indicated for the tract.
2. All tracts where USDA benefits subject to the provisions had been received.

In addition, all tracts given a variance determination from prior year by NRCS are added, as well as those tracts on which FSA county or State committees granted good faith with the exception of a declared disaster, (AC). Finally, State Conservationists have the authority to increase the random sample for management reasons due to the results of quality assurance and customer conformance reviews and reports.

Details on the following findings are included in the analysis section of the report. Overall, the review data shows that conservation practices are being implemented on the land.

### **Findings:**

- 21,769 tracts were recorded in the web application for 2007.
- 177 (1.1%) highly erodible land tracts were found not in compliance out of 15,588 HEL tracts, compared to 232 (1.0%) in 2006, 344 (1.7%) in 2005, and 260 (0.9%) in 2004.
- 99 (1.0%) tracts were identified as having potential wetlands violations (PV's) out of the 9,989 wetlands tracts in 2007. This is compared to 87 (0.7%) in 2006, 100 (0.7%) in 2005 and 107 (1.0%) in 2004.
- The amount of time spent conducting the compliance reviews was reduced 1.5 staff years by calculating total time at 27.0 staff years in 2007, compared to 28.5 in 2006, and 31.9 in 2005. This reduction reflects the reduction in the number of invalid tracts resulting in a significant savings of time spent to replace invalid tracts.
- 88 tracts received a second variance determination (11.8%) after getting a variance determination in 2006 compared to 73 (10.2%) in 2006, 81 (10.4%) in 2005. This count may be due to the Farm Service Agency providing either a good faith or hardship exemption to participants given a prior year violation. This needs additional investigation.
- Nineteen States did not have any compliance violations in 2007, 9 in East, 1 in Central, and 9 in West Regions. States with 1 – 5 violations numbered 13 East, 5 Central, and 4 West Regions. There were 7 States with 15 or more violations all in the Central Region.

**Recommendations:**

- Provide a national training for implementation of the Food Security Act Compliance Review procedures. Emphasis on the following:
  - Reviewers continue to replace tracts that do not need to be replaced so it consumes more time to complete the reviews in a State.
  - The requirement to add employee tracts and farm loan recipients.
  - The handling of variance determinations from one year to the next.

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## **Background**

Compliance reviews are conducted on highly erodible cropland (HEL) and wetlands (WET) designated farm tracts. A compliance review requires an inspection of the tract to identify if conservation systems have been implemented and maintained as required by statute on Highly Erodible Cropland where annually tilled agricultural commodity crops are being produced, or to ensure that those wetlands subject to the Wetland Conservation provisions have not been converted to agricultural production. This review also provides information where the current participant may no longer be participating in those USDA programs subject to HELC/WC or where the land is no longer in agricultural production.

The data included in the analysis for crop year 2007 was collected using the FSA Compliance web based application. Farms and/or ranches with tracts found to be in non-compliance with the provisions are subject to revocation of certain USDA benefits in the crop year of the non-compliance violation(s) and for any future year until the participant is reinstated for receipt of USDA benefits by applying a conservation plan; and with regard to wetland conservation violations, for benefits back to the year of the violation and for any future benefits until the USDA participant has fully restored or mitigated the wetland area(s) that were converted.

The NRCS compliance review process requires that a qualified NRCS employee make an on-site determination of the participating farmer and/or rancher's compliance with the Farm Bill regulations, 7 CFR 12. NRCS has designated 12 compliance review labels to indicate the status of compliance with the regulations as follows:

- AA** - Actively applying an approved Conservation Plan
- AC** - Actively applying with a variance because of severe and unusual conditions
- AE** - Variance for Economic Hardship Relief
- AG** - Exemption based on a Good Faith Determination by FSA
- AH** - Actively applying with a variance because of extreme personal hardship
- AM** - Actively applying with minimal or technical effect variance (HELC)
- CA** - Conditionally Actively Applying
- EX** - Used for tracts where review is limited to a specific field either from a prior year either from a prior year variance or agency referral
- NC** - Compliance review not conducted
- TA** - Exemption for Deficiency found while providing technical assistance
- UA** - Fully applied and maintaining all practices
- NN** - Plan not needed

There are two determinations indicating the tract may not be in compliance with the regulations.

- NA** - Not actively applying (a conservation system)
- PV** - Potential Wetland Violation, based on either a conversion or a planting violation.

Full definitions of these determinations are included in the Appendix, Table 7.

**Background:** *(continued)*

A total of 13,665 randomly selected tracts were sent to the States for the 2007 HELC/WC compliance review. These tracts were selected from a database maintained by the Farm Service Agency containing nearly 4.0 million tracts designated as HEL or Wetlands. States also conducted compliance reviews on tracts other than those sent from National Headquarters. The additional tract reviews were placed in one of six categories and identified in the database as being initiated at the field or State level.

The categories for State added tract reviews required by policy are:

- A** - Assigned by another agency or whistleblower
- T** - Technical assistance variance granted in prior year
- U** - USDA employee tract
- W** - Wetlands tract added by State
- M** - Replacement tract

The category of V is automatically added after the random tracts are selected based on the determination from the prior year.

- V** - Variance or exemption tract designation from the previous year

**Methodology**

The tracts selected for review in any year are randomly generated from a database maintained by the Farm Service Agency. This database includes all tracts where a person received a USDA benefit or a farm program payment and is flagged as HEL and/or Wetlands tracts. The random tracts total approximately one percent of the total database which represents a sample significant to the national level. All States receive at least one tract for review each year. Once the tracts have been finalized, they are listed in the web application for recording the review results.

**Analysis**

The web compliance review collection system is the repository for numerous determination codes that have been in effect since 1994. Comparisons with years 2004 to 2007 on HEL or Wetlands tracts are included in this report, as the same data elements have been collected in each of these years. Examples of the determinations are in the Appendix.

**Sample Tracts:**

The introduction of the web application for conducting compliance reviews made it easier to communicate the tracts and record the findings of the reviews. This provision was developed in compliance with recommendations from the Office of the Inspector General and the General Accountability Office audits. There were 13,665 sample tracts this year compared to 15,857 tracts selected in 2006, 19,675 tracts selected in 2005, and 19,714 tracts selected in 2004. The web application provides NRCS employees at State, area, and field offices access to the randomly selected sample tracts in January so that reviews are conducted more timely at the correct time of year to plan their workloads and conduct the actual field reviews. The sample size changed this past year due to a modification of the process used to select tracts from the Farm Service Agency.

**Analysis:** (continued)

The Sample tracts replaced are as follows: 861 in 2007, 3,724 in 2006, and 3,629 in 2005. The identification of replaced tracts was automated in 2005 so we compare replaced tracts for just the last 3 years. The large decrease in sample tracts needing to be replaced is directly attributed to the new criteria for identifying tracts eligible for review. Sample Tracts not reviewed for each year was 1 in 2007, 4 in 2006, 2 in 2005, and 91 in 2004.

**Figure 1: Tracts Replaced by Category Designation and Tract Status**

Category Name	2005			2006			2007		
	Valid	INF	Total	Valid	INF	Total	Valid	INF	Total
R - Random (HEL)	1,665	1,964	3,629	1,335	2,389	3,724	314	547	861
A - Assigned by another	35	42	77	15	25	40	33	35	68
M - Replacement Tract	141	115	256	284	188	472	46	41	87
T - Technical Assistance	3	4	7	0	0	0	0	1	1
U - Assigned by a USDA	47	29	76	16	32	48	30	36	66
V - Variance tract prior yr	7	21	28	7	24	31	13	23	36
W - Random (Wetlands)	0	1	1	0	5	5	0	1	1
<b>Totals</b>	<b>1,898</b>	<b>2,176</b>	<b>4,074</b>	<b>1,657</b>	<b>2,663</b>	<b>4,320</b>	<b>436</b>	<b>684</b>	<b>1,120</b>

**Note:** INF – Tracts marked as Invalid or Not Found.

Tracts that have the valid designation and are still replaced because the reviewer did not identify any wetlands and indicated that the HEL determination was NN, Not Needed. Technically this would make the selected tract invalid, but the instructions do not tell the user to change the tract designation. The web application automatically asks for a replacement tract number when this situation occurs.

**Concern:**

The number of replaced tracts was reduced by the new selection criteria by about 75 percent in 2007, but the number of category V – Variance Tract from Prior Year replaced has stayed constant through the 3 years. It may be due to actions granted by the Farm Service Agency. Variance tracts were granted the waiver to correct a condition on the tract and should not be replaced.

**Summary of 2007 Compliance Review Findings:**

A total of 21,769 tracts were entered into the HELC/WC compliance review web application for the 2007 crop year reviews. NRCS added a new feature to the application in 2005 that allowed the State compliance review coordinators to delete tracts added by mistake or error. There were 499 tracts deleted in 2007, compared to 560 in 2006, and 715 in 2005. Full reviews were not done on these tracts as well as 1,120 replaced, 1 new, and 11 incomplete for a total of 1,631 compared to 4,892 tracts in 2006. Almost all of the incomplete tracts were invalid, but no replacement tract could be identified for various reasons and were allowed to be submitted.

**Analysis:** (continued)

### Summary Report for All Tracts

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Total No. of Tracts in Database	21,769
Total No. of Tracts Reviewed:	20,134
Total Acreage of Tracts Reviewed:	2,767,765.2
Total Hours Spent Reviewing Tracts:	55,716.1

#### HEL Compliance Information

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Tracts in HEL Compliance (no.):	15,588
Tracts in HEL Compliance (ac.):	2,147,830.1
Tracts Out of Compliance (no.):	177
Tracts Out of Compliance (ac.):	23,752.8

#### Wetlands Tract Information

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Tracts with Wetlands Present (no.):	9,989
Tracts with Wetlands Present (ac.):	1,440,947.8
Tracts with Wetlands Violations	99
Tracts with Wetlands Violations (ac.):	13,829.8

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Note: *HEL Compliance information tracts count all tracts that do not have wetlands present and no HEL land. Some wetlands tract information is included in the HEL reviews*

#### Status Review Areas of Concern

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Total Number of Tracts Replaced:	1,120
Total Number of Invalid Tracts:	650
Total Number of Tracts Not Found:	34
Total Number of Invalid Tracts not in Sample Set:	123
Total Number of Tracts Not Found not in Sample Set:	14

Note: *All Invalid and Not Found tracts must be replaced so replaced tract count should be close to that total. There should be no Invalid or Not Found tracts that are not part of the random sample set. The difference between Replaced tracts and Invalid or Not Found is the result of reviewers marking No Wetlands and No HEL which triggers an automated replace tract function but leaves the valid tract indicator on the replaced tract.*

**Analysis:** (continued)

**Invalid Tracts:**

The random query for the 2007 review application was clarified to provide that the tracts randomly selected were subject to those USDA benefits subject to the HELC/WC provisions and where annually tilled agricultural commodities (DHP) were produced. Thus, a further clarification as to what actually constitutes the continued use of tract invalidity as a reason for not reviewing a specific tract needs to be made. Changes in the query and the NFSAM 518.03(c) policy were made in order to reduce the number of invalid tracts. In past years, a reviewer would mark a tract invalid if they had trouble finding office records about the farm. An invalid tract is one where, following the six-step table in the NFSAM, 518.03(c), the tract does not fit the requirements for making an HELC/WC compliance status review.

**Figure 2: Recorded Acres on Invalid Tracts**

	<b>2004</b>	<b>Acres</b>	<b>2005</b>	<b>Acres</b>	<b>2006</b>	<b>Acres</b>	<b>2007</b>	<b>Acres</b>
Invalid Tracts	1,268	151,373	2,072	138,558	2,552	65,248	650	21,598
Tracts Not Found	105	3940	121	3,888	113	1,637	34	1,474
<b>Total</b>	<b>1,373</b>	<b>155,313</b>	<b>2,193</b>	<b>142,446</b>	<b>2,665</b>	<b>66,885</b>	<b>684</b>	<b>23,072</b>

**Figure 3: Invalid Tracts by Category**

<b>Category Name</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
A - Assigned by another agency or whistleblower	52	44	25	35
M - Replacement Tract		120	190	41
R - Random (HEL)	1,185	1,972	2,389	547
T - Technical Assistance Variance		4		1
U - Assigned by a USDA employee	109	29	32	36
V - Variance tract designation from previous year	26	23	24	23
W - Random (Wetlands)	1	1	5	1
<b>Totals</b>	<b>1,373</b>	<b>2,193</b>	<b>2,665</b>	<b>684</b>

**Concerns:**

In 2007, the number of invalid tracts was 684 which represent 3.4 percent of the 20,134 tracts reviewed, compared to 11.7 percent invalid in 2006. Of this total, 547 were on random tracts which are 4.0 percent of the 13,665 random tracts being declared invalid or not found compared to 15 percent in 2006. The fact that acres are recorded indicates the tracts are marked invalid because they do not have HEL or Wetlands. All invalid tracts must be replaced in accordance with NFSAM 518.03(c). It does not explain how tracts designated as “Not Found” have acres recorded in the review.

The data shows that replacement tracts were also marked invalid. Nationwide, 41 replacement tracts were replaced again because they were marked invalid, 6 percent of invalid tracts. Replacement tracts should be valid tracts.

**Analysis:** *(continued)*

States also marked 23 tracts invalid that had a variance determination from the prior year. If the tracts were valid last year, then the reason for a change in tract status needs to be researched. States declared 73 tracts as invalid even though they were added by a field office (Categories A, T, U, W).

**Tracts Found Non-Compliant:**

The number of tracts found not in compliance (i.e., NA or PV Designation) the last 3 years continues to indicate that conservation practices are being implemented.

**Figure 4: Non-Compliant Tracts Count**

	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
Total Tracts Reviewed	29,079	25,892	22,741	20,134
Tracts Out of Compliance	260	432	319	276
Percent out of Compliance	0.9%	1.7%	1.4%	1.4%
# of States Recording Non Compliance	34	39	33	33

Eight of the 33 States with compliance violations had 10 or more tracts out of compliance. They accounted for 206 of the 276 (74%) non-compliance tracts with 5 States having 25 or more non-compliance tracts.

**Figure 5: Count of States with Non-Compliant Tracts by Number of Violations**

<b>Number of Non-Compliant Tracts</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
None	14	13	19	19
1 – 5	20	18	20	22
6 – 15	13	14	6	5
16 and above	5	7	7	6

**Concerns:**

Data shows that 41 States are reporting less than five violations in 2007. This figure includes the 19 States that did not have any violations reported. The States with no reported violations were distributed with 9 from the East Region and 9 from the West Region. For the count of States recording more than 15 non-compliant tracts, all 6 States are in the Central Region. For the category of 1-5 non-compliant tracts, 12 were East Region, 5 Central Region, and 5 West Region.

Additional details on States recording no violations are contained in Table 6 in the Appendix.

**Analysis:** *(continued)*

**Sample vs. Added Tracts:**

The compliance review data consists of random sample tracts sent to the States from National Headquarters and States add tracts according to policy. Table 6 in the Appendix shows the number of sample tracts and tracts added by States in the last 5 years. Most of the non-compliant tracts are being found by States in the tracts that they add to the review. Number of tracts in each year is the count of completed reviews in sample and added tracts.

**Figure 6: Sample and Added Tracts Non-Compliant**

	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>	<b>% Non-Com 2007</b>
Sample Tracts	19,468	15,943	12,126	12,803	
Sample Tracts Non-Compliant	88	229	120	86	0.7%
Added Tracts	11,053	9,945	10,483	7,331	
Added Tracts Non-Compliant	172	203	199	190	2.6%
Total Non-Compliant Tracts	260	432	319	276	1.4%

The emphasis is on checking tracts for both HEL compliance and Wetlands compliance accounts for the larger number of violations in the added tracts.

**Wetlands Tracts:**

The identification of a Wetlands farm tract is the responsibility of the reviewer. To identify a tract as a potential Wetlands violation, the reviewer was requested to enter 'yes' to State that wetlands conditions were present on the tract and then determine if a potential violation has occurred. This year, 99 tracts indicated a potential Wetlands violation compared with 87 in 2006, 101 in 2005, and 107 in 2004.

This year, there were 9,989 that contained wetlands or had wetlands conditions, compared to 11,746 tracts in 2006, 13,679 tracts in 2005, and 10,262 in 2004. This indicates that 49 percent of the 2007 valid tracts had wetlands conditions compared to 52 percent in 2006, 53 percent in 2005, and 35 percent in 2004. The identification of wetlands present on tracts was clearly defined starting in 2005. The 2004 data still had some unclear instructions about wetlands identification.

**Concern:**

The identification of wetlands present on tracts seems to be improving with the changes to the wetlands section of the compliance review. Reviewers are consistently checking for wetlands conditions and violations according to policy. Reviewers continue to replace tracts that have wetlands conditions and no HEL. These tracts should not be replaced because they satisfy the review requirement of reviewing for wetlands violations.

**Analysis:** (continued)

**Full Compliance Determinations:**

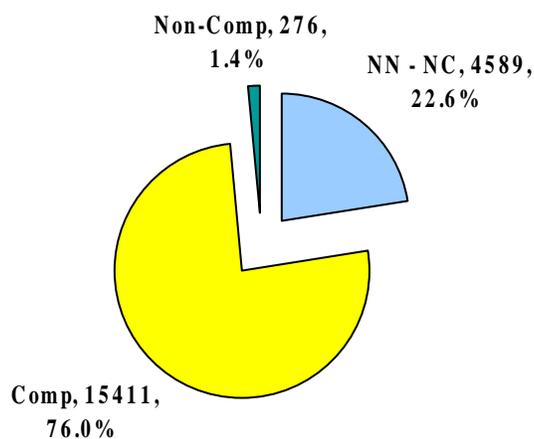
Tracts in full compliance receive the designations UA - fully applied and maintaining all conservation practices or AA - actively applying an approved conservation plan. Even though we know that only 1.4 percent in 2007 was non-compliant, the other determinations do not automatically indicate compliance. The total of UA and AA determinations for the last 4 years has decreased slightly, but the percent of completed reviews is rising.

**Figure 7: Full Compliance Determinations**

	<b>2004</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
UA Determination	8,549	10,086	9,425	8,859
Percent of Total Tracts	28.0%	39.0%	41.7%	44.0%
AA Determination	5,400	7,046	5,986	5,973
Percent of Total Tracts	17.7%	27.2%	26.5%	29.7%
Total Percent of Tracts Reviewed	45.7%	66.2%	68.2%	73.7%

This table makes it impossible to state that 1.4 percent of the tracts being non-compliant equates to 98.6 percent compliant. The graph below shows why this cannot be stated this way. The determinations NN and NC indicate that no HEL review was conducted or was not needed, so it may be compliant with wetlands provisions and therefore be conservation compliant. Also, a variance determination indicates partial compliance.

**2007 FSA HEL Compliance Review Summary**



**Concern:**

There continues to be a large number of NN – NC determinations which States are recording correctly on tracts that have Wetlands. We are now able to better separate wetlands tracts that are given the NN or NC HEL determination. Ninety-six percent of these NN tracts (4379) are recorded on tracts that are identified as having wetlands which indicates no HEL land on tract.

**Analysis:** *(continued)*

**NN Determinations:**

Additional analysis of the valid tracts designated as ‘NN - Plan Not Needed’ shows that the region percentage of compliance reviews receiving this designation dropped significantly the past 2 years. The table below shows the total number of tracts reviewed by region and the number of tracts receiving the ‘NN - Plan Not Needed’ determination for the years 2004, 2005, 2006, and 2007. The percent column shows the percent of total tracts reviewed getting the NN determination in 2007.

**Figure 8: NN Determinations by Region**

Region	Total Tracts Reviewed				Plan Not Needed Designation				% of 2007
	2004	2005	2006	2007	2004	2005	2006	2007	
East	8,914	8,625	6,238	4,703	4,146	2,063	1,463	635	14%
Central	17,161	14,613	14,093	13,285	8,203	5,165	4,538	3,628	27%
West	3,365	2,648	2,258	2,146	1,215	375	304	104	5%
National	29,440	25,886	22,589	20,134	13,564	7,603	6,305	4,367	22%

The table shows that 22 percent of the tracts reviewed in the country are being designated as ‘Plan Not Needed.’ A review of the data in 2007 indicates 100 percent of the tracts show wetlands present indicating there are no HEL conditions. There has been an emphasis on replacing tracts that were not valid for review, which are tracts with NN and No Wetlands. It is suspected that the large number (13,564) of NN tracts in 2004 was created by reviewers not following the process for replacing tracts. The 2004 review year was the first time the replacement tract process was used.

**Figure 9: NN Determinations on Wetlands Tracts by Region**

Region	Plan Not Needed Designation				‘NN’ Tracts with Wetlands Present				% of 2006 Reviews
	2004	2005	2006	2007	2004	2005	2006	2007	
East	4,146	2,063	1,463	635	2,230	2,051	1,463	635	100%
Central	8,203	5,165	4,538	3,628	3,564	4,426	4,538	3,628	100%
West	1,215	375	304	104	264	374	304	104	100%
National	13,564	7,603	6,305	4,367	4,855	2,107	6,305	4,367	100%

**Analysis:** (continued)

**Time Spent Conducting Reviews:**

The amount of time spent conducting a review changes with the type of review determination. The following table shows the average time spent on the reviews for each of the groupings of determinations. For all of the tracts submitted, the reviews accounted for 27.0 staff years at a cost of \$3.03 million, compared to 28.5 staff years at \$2.92 million in 2006 and 31.9 staff years at \$3.26 million in 2005. This cost is calculated using an average hourly rate of \$53.98 for CTA-General for fiscal year 2007 and staff year is calculated on 2,080 hours based on CTA program.

**Figure 10: Costs of Conducting Review Groups for 2007**

Group	Tracts	% of Total Tracts	Hours	Average Time	Cost
Compliance – UA/AA	14,832	73.31%	40,673	2.74	\$2,195,528.54
Variance	746	3.69%	4,022	5.39	\$217,107.56
Non-Compliance NA/PV	276	1.36%	1,850	6.65	\$99,863.00
NN/NC	4,379	21.64%	9,679	2.21	\$522,472.42
Totals	20,233		56,224	2.78	\$3,034,971.52

Looking at the same categories for the last 3 years shows an upward trend in the variance group average hours, while there continues to be a steady decrease in the hourly time of tracts in full compliance and tracts given an NN/NC.

**Figure 11: Prior Years Time Spent on Review Groups**

Group	2005 Reviews			2006 Reviews			2007 Reviews		
	Tracts	Hours	Avg. Time	Tracts	Hours	Avg. Time	Tracts	Hours	Avg. Time
Compliance – UA/AA	17,134	45,447	2.65	15,411	39,997	2.60	14,832	40,673	2.74
Variance	655	2,690	4.11	595	2,808	4.72	746	4,022	5.39
Non-Compliance NA/PV	432	1,989	4.60	317	2,128	6.71	276	1,850	6.65
NN/NC	7,759	16,252	2.09	6,353	14,514	2.28	4,379	9,679	2.21
Totals	25,980	66,378		22,676	59,447		20,233	56,224	

The amount of time to conduct variance and compliant determinations is increasing. This may be an indication that the review process is stabilizing and time is being recorded more accurately because of familiarity with the process.

**Analysis:** *(continued)*

**Variance Tracts:**

One of the main policy provisions of the compliance review process is that a variance designation allows the farm to remain in the farm program for the crop or compliance review year in which the variance was granted. A subsequent follow-up review is required in the following year except for a severe and unusual condition variance based on a declared natural disaster.

The table below shows the number of tracts given a variance in the eight variance determinations (AC, AE, AG, AH, AM, CA, EX, TA) for the last 3 years. Each review year takes the variance tracts from the last year and adds them to the random tracts in the current year. The last two columns show the number of tracts given a second variance determination.

**Figure 12: Variance Tract Policy Compliance**

Variance Determination	Variance Determinations by Year				Count of Prior Year Variance with Second Variance		
	2004	2005	2006	2007	05 Rev	06 Rev	07 Rev
AC - Actively applying with a variance because of severe and unusual conditions	70	65	71	109	9	8	10
AE - Variance Received Due to Economic Hardship	19	12	11	4			
AG - Exemption based on a Good Faith Determination by the Farm Service Agency	134	69	65	88	7	3	10
AH - Actively applying with a variance because of extreme personal hardship	25	35	37	32	2	1	3
AM - Actively applying with minimal or technical effect variance	358	324	270	347	43	40	24
CA - Conditionally Actively Applying	82	99	99	122	9	13	27
EX - Used for tracts where the review is limited to a specific field either from a prior year variance or agency referral		11	3	7			1
TA - Exemption for Deficiency found while providing technical assistance	41	40	39	37	11	8	13
<b>Totals:</b>	<b>729</b>	<b>655</b>	<b>595</b>	<b>746</b>	<b>81</b>	<b>73</b>	<b>88</b>

The table shows that the variance determinations increased in the last year, and the total number of variance determinations receiving a second variation increased. Also, 11 of the 595 prior year 2006 variances were replaced in 2007. (See Table 9 in the Appendix for a summary of variance determinations by State.)

**Analysis:** *(continued)*

**Review of Comments:**

The review for 2007 on tracts regarding the NN or NC determinations requests comments to help document this determination. In 2007, there were 4,814 comments on tracts that received the NN or NC determination. This would include all tracts in the database which are valid, invalid, or not found. Four thousand one hundred forty-four (86%) of these comments used the reference no agricultural commodity crops grown on tract.

Reviewers did follow policy by providing some comment for all tracts that received NN or NC determinations and also for all tracts that were replaced. The web application reminds the reviewer to provide an explanation of the determination by providing a list of reasons. Figure 13 shows a summary of the comments.

**Figure 13: Coded Comments for NN or NC HEL Determinations**

ID	Reason Comment	Total Tracts	Completed Review	Incomplete Review	Replaced Tract
1	Land converted to Non-agricultural uses	149	102	1	46
2	NN due to waiver of tract selection	290	145	1	144
3	No agricultural commodities being grown on tract	4,144	3,928	4	212
4	No agricultural commodities being grown on HEL	40	28		12
5	No HEL on tract	37	17		20
6	No HEL; No commodities; No Wetlands	18	8	2	8
7	No Wetlands on tract	44	9		35
8	Participant does not participate in USDA programs	27	11	1	15
9	Previous violation determination under appeal	3	3		0
10	Tract not subject to either HEL or WC	62	55		7
	Total	4,814	4,306	9	499

**Supporting Tables in the Appendix:**

Table 1 shows the 2007 compliance reviews by determination code in tracts, hours, and acres. This table separates the compliance and non-compliance determinations. All of the tracts in the “PV – Potential Wetlands Violation” determination are also counted in one of the other determination codes since they also received an HEL determination.

Table 2 shows that the number of tracts in the sample and the number of tracts added has stayed level through the last 3 years. The decrease in 2007 was due to a change in the random selection process and emphasis on adding tracts. The percent of tracts added by States in 2007 was 56 percent, compared to 70 percent in 2006, 53 percent in 2005, and 56 percent in 2004. States are required to add tracts owned by government employees, whistleblower complaints, and farms receiving credit loans. Not all States are adding tracts according to policy.

## **Analysis:** *(continued)*

Table 3 shows the breakdown of the sample and added tracts by region. The number of tracts in each category remains level through 3 years. The States in the East region added more tracts by percentage than the others. There was an increase in the number of States adding fewer than 10 tracts with 11 States in 2007, compared to 6 in 2006, 8 in 2005, and 10 in 2004.

Table 4 shows a breakdown of tracts receiving the NN – Plan Not Needed designation through the last 3 years. It shows the totals of NN determinations for each year, 2004 through 2007, for each of the categories of tracts reviewed. In 2007, the tracts marked as “NN – Plan Not Needed” determination decreased in all Regions. This is due to the requirement to replace invalid tracts.

Table 5 shows a summary of tracts reviewed by each State in the years 2004-2007, broken down into sample tracts reviewed and a count of tracts added by the State each year. Eleven States added fewer than 10 tracts in 2007. The decrease in added tracts is due to the change in the selection process that resulted in fewer invalid tracts and an emphasis placed on reviewing the regulations of the FSA Compliance regulation.

Table 6 shows a 4-year distribution of non-compliance determinations by regions and States for HEL and Wetlands. The table highlights the 16 States that did not have any violations in at least the last 2 years. There were two States in the East Region and six in the West Region that have never recorded either type of violation. In addition, 19 States did not record any violations in 2007 and are highlighted in the 2007 column. This compares to 19 in 2006, 13 in 2005, and 5 in 2004.

Table 7 shows the determination code definitions.

Table 8 shows the summary all tracts replaced in 2007. Six States replaced more than 10 percent of their random tracts, and nationwide 3 percent of the random tracts were replaced. This is a change from seven States replacing 25 percent in 2006, six States replacing more than 40 percent in 2005, and a national replacement of 16 percent in 2006, and 20 percent in 2005.

Table 9 shows the summary of variance determinations for each State in 2007. Most of the variance determinations are assigned in the Central region (79%), with the East Region assigning 17 percent and the West Region 4 percent.

## **Recommendations**

- Provide a national training for implementation of the Food Security Act Compliance Review procedures. Emphasis on the following:
  - Reviewers continue to replace tracts that do not need to be replaced so it consumes more time to complete the reviews in a State.
  - The requirement to add employee tracts and farm loan recipients.
  - The handling of variance determinations from one year to the next.



## Appendix

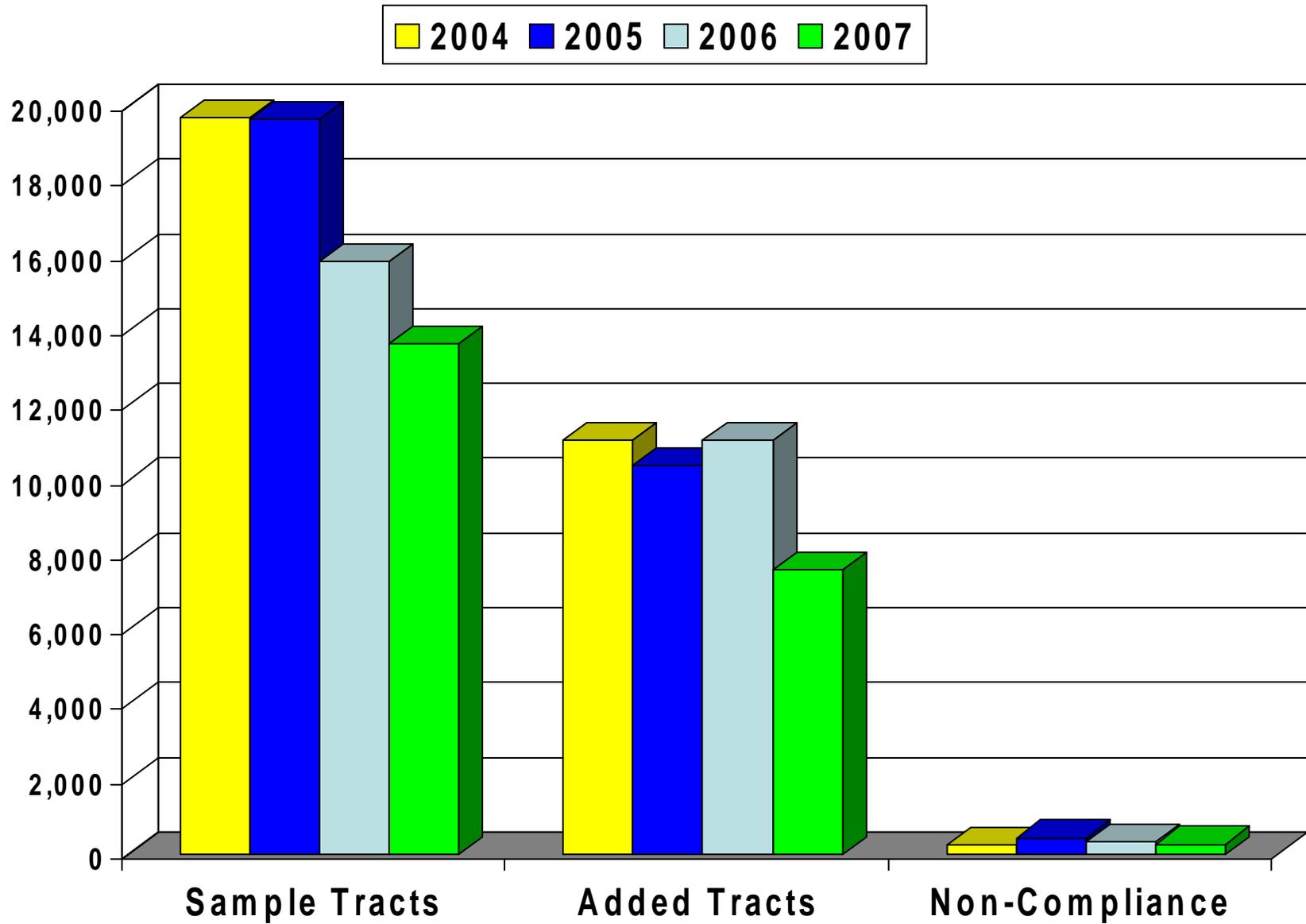
- Table 1: *Compliance Review Summary by Determination Code* provides a breakdown of the reviews by the 13 determination codes.
- Table 2: *Sample Tracts and Tracts Added by States for the Years 2004 thru 2007* compares 2007 compliance review with the reviews conducted in 2004 through 2006 showing sample tracts sent from National Headquarters and tracts added by States.
- Table 3: *Sample and Added Tracts by Region* provides a breakdown of the sample tracts sent to the States and the number of added tracts entered by the States in each of the regions.
- Table 4: *Tract Determinations of NN by Region, Category, and Year.*
- Table 5: *Tract Review Breakdown by Region, State, and Year.*
- Table 6: *Summary of Compliance Review Violations – HELC/WC.*
- Table 7: *Compliance Review Determination Codes and Definitions.*
- Table 8: *Replaced Tracts Summary by Region in 2007.*
- Table 9: *Variance Determination Tract Summary for 2007.*



**Table 1: Compliance Review Summary by Determination Code**

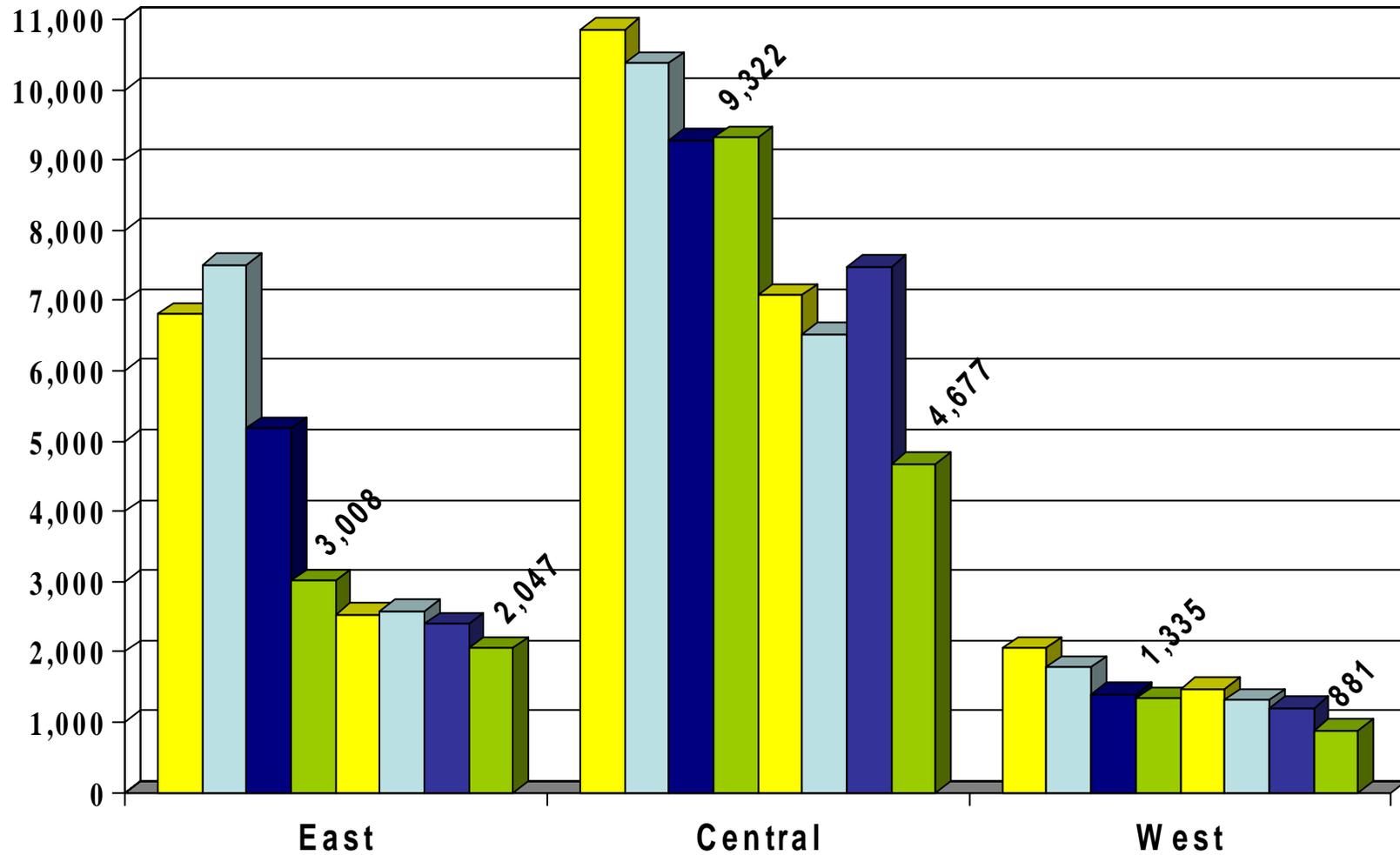
<b>FSA COMPLIANCE REVIEW SUMMARY BY DETERMINATION CODE</b>			
<b>Compliance Review Determination Code</b>	<b>Total Tracts</b>	<b>Total Time (HRs)</b>	<b>Total Acres</b>
<b>In Compliance</b>			
AA – Actively applying an approved Conservation Plan	5,973	14,494	661,325
AC – Actively applying with a variance because of severe and unusual conditions	109	723	23,433
AE – Variance for Economic Hardship Relief	4	14	309
AG - Exemption based on a Good Faith Determination by FSA	88	765	12,941
AH – Actively applying with a variance because of extreme personal hardship	32	153	9,390
AM - Actively applying with minimal or technical effect variance	347	1,615	42,620
CA - Conditionally Actively Applying	122	559	14,295
EX - Used for tracts where review is limited to a specific field either from a prior year variance or agency referral	7	17	846
NC - Compliance review not conducted	12	25	1,248
NN – Plan not needed	4,367	9,653	595,994
TA - Exemption for Deficiency found while providing technical assistance	37	178	5,960
UA – Fully applied and maintaining all practices	8,859	26,178	1,375,652
<b>Compliance Totals</b>	<b>19,957</b>	<b>54,374</b>	<b>2,744,013</b>
<b>Not In Compliance</b>			
NA - Not actively applying	177	1,343	23,753
PV - Potential Wetland Violation	99	507	13,830
<b>Non-Compliance Totals</b>	<b>276</b>	<b>1,850</b>	<b>37,583</b>
<b>Grand Totals</b>	<b>20,233</b>	<b>56,224</b>	<b>2,781,596</b>

**Table 2: Sample Tracts and Tracts Added by States for the years 2004 thru 2007**



**Table 3: Sample and Added Tracts by Region**

 2004 Samp	 2005 Samp	 2006 Samp	 2007 Samp
 2004 ADD	 2005 ADD	 2006 ADD	 2007 ADD





**Table 4: Tract Determinations of NN by Region, Category, and Year**

Region	Category	2004	2005	2006	2007
<i>East</i>					
	A - Assigned by another agency or whistleblower	157	60	51	84
	M - Replacement Tract	0	152	186	30
	R - Random (HEL)	2,679	920	1,116	418
	T - Technical Assistance Variance	1	4	1	0
	U - Assigned by a USDA employee	218	35	99	91
	V - Variance tract designation from previous year	6	3	11	12
	W - Random (Wetlands)	16	8	6	1
	<b>Total for East Region</b>	<b>3,077</b>	<b>1,182</b>	<b>1,470</b>	<b>636</b>
<i>Central</i>					
	A - Assigned by another agency or whistleblower	632	462	413	611
	M - Replacement Tract	0	1,172	652	193
	R - Random (HEL)	8,198	3,938	2,764	2,460
	T - Technical Assistance Variance	1	30	7	1
	U - Assigned by a USDA employee	908	457	672	359
	V - Variance tract designation from previous year	22	28	21	12
	W - Random (Wetlands)	168	41	32	10
	<b>Total for Central Region</b>	<b>9,929</b>	<b>6,128</b>	<b>4,561</b>	<b>3,646</b>
<i>West</i>					
	A - Assigned by another agency or whistleblower	43	18	46	21
	M - Replacement Tract	0	105	63	1
	R - Random (HEL)	977	218	149	61
	T - Technical Assistance Variance	3	0	0	0
	U - Assigned by a USDA employee	232	36	51	18
	V - Variance tract designation from previous year	4	0	3	1
	W - Random (Wetlands)	4	0	2	1
	<b>Total for West Region</b>	<b>1,263</b>	<b>377</b>	<b>314</b>	<b>103</b>
<b>Total Tracts With NN Determination</b>		<b>14,269</b>	<b>7,687</b>	<b>6,345</b>	<b>4,385</b>

**Note:** W – category was not identified in the sample data. It represents State added wetlands tracts.  
M – Replacement Tract was added in the 2005 review year.

**Table 5: Tract Review Breakdown by Region, State, and Year**

		Sample Tracts				Added Tracts			
Region	State	2004	2005	2006	2007	2004	2005	2006	2007
<i>East</i>									
	Alabama	412	434	331	46	86	129	140	37
	Connecticut	16	20	15	10	21	14	16	9
	Delaware	28	24	15	13	3	15	5	4
	Florida	92	145	113	40	34	88	88	14
	Georgia	445	451	341	125	68	72	50	16
	Kentucky	712	1,149	840	561	535	762	732	506
	Maine	44	37	28	10	4	9	4	2
	Maryland	90	98	75	71	24	19	75	52
	Massachusetts	23	18	15	3	0	69	35	33
	Mississippi	328	340	275	217	154	16	22	18
	New Hampshire	10	5	6	4	6	0	10	1
	New Jersey	27	27	23	15	9	19	12	35
	New York	255	307	265	209	52	77	92	86
	North Carolina	685	496	684	319	462	214	208	140
	Ohio	775	375	578	337	59	44	101	59
	Pennsylvania	295	443	340	330	53	67	87	33
	Puerto Rico	3	37	31	0	0	31	34	1
	Rhode Island	2	2	1	0	6	7	5	5
	South Carolina	259	267	199	46	116	58	111	22
	Tennessee	497	847	638	410	87	170	220	788
	Vermont	37	29	23	17	59	38	74	33
	Virginia	297	386	288	203	18	109	182	85
	West Virginia	42	80	59	22	16	43	89	88
	<b>Total</b>	<b>5,374</b>	<b>6,017</b>	<b>5,183</b>	<b>3,008</b>	<b>1,872</b>	<b>2,070</b>	<b>2,392</b>	<b>2,067</b>
<i>Central</i>									
	Arkansas	320	373	266	77	18	57	100	73
	Illinois	1,383	1,479	1,102	817	419	762	845	517
	Indiana	888	858	628	474	443	264	356	246
	Iowa	1,199	1,225	905	1,000	1,178	922	781	628
	Kansas	1,141	1,128	808	576	823	842	1101	664
	Louisiana	279	276	204	110	144	68	57	9
	Michigan	547	641	479	434	209	249	237	149
	Minnesota	918	740	716	709	464	281	231	188
	Missouri	833	677	682	749	450	403	475	253
	Nebraska	817	606	592	902	360	541	633	430
	North Dakota	716	666	564	963	340	212	487	323
	Oklahoma	606	539	395	424	1,194	745	543	178
	South Dakota	761	662	486	736	366	529	499	275
	Texas	1,137	1,136	797	618	639	633	554	262
	Wisconsin	746	873	653	733	682	521	578	462
	<b>Total</b>	<b>12,291</b>	<b>11,879</b>	<b>9,277</b>	<b>9,322</b>	<b>7,729</b>	<b>7,029</b>	<b>7,477</b>	<b>4,657</b>

		Sample Tracts				Added Tracts			
Region	State	2004	2005	2006	2007	2004	2005	2006	2007
<i>West</i>									
	Alaska	0	3	2	0	2	0	2	0
	Arizona	32	17	14	2	0	5	5	7
	California	198	250	189	37	14	70	109	16
	Colorado	302	304	227	250	813	555	418	394
	Hawaii	1	3	1	0	1	3	6	1
	Idaho	179	213	158	155	98	110	177	153
	Montana	785	461	402	597	170	244	142	166
	Nevada	11	9	10	3	0	7	16	20
	New Mexico	76	63	58	50	75	33	86	16
	Oregon	99	112	83	51	18	37	44	13
	Pacific Basin	0	1	2	0	0	1	10	1
	Utah	82	79	60	18	66	39	55	28
	Washington	182	210	151	134	149	172	106	42
	Wyoming	102	54	41	38	65	32	24	24
	<b>Total</b>	<b>2,049</b>	<b>1,779</b>	<b>1,398</b>	<b>1,335</b>	<b>1,471</b>	<b>1,308</b>	<b>1,200</b>	<b>881</b>
<b>Grand Total</b>		<b>19,714</b>	<b>19,675</b>	<b>15,858</b>	<b>13,665</b>	<b>11,072</b>	<b>10,407</b>	<b>11,069</b>	<b>7,605</b>

**Table 6: Summary of Compliance Review Violations – HELC/WC**

State	2004		2005		2006		2007		
	HEL	PV	HEL	PV	HEL	PV	HEL	PV	
<i>East</i>									
Alabama	2	0	2	0	0	1	0	1	
Connecticut	0	0	0	0	0	0	0	0	
Delaware	0	0	0	0	0	0	1	0	
Florida	0	2	6	0	0	1	0	1	
Georgia	5	1	22	0	0	0	0	0	
Kentucky	1	0	0	0	4	0	1	0	
Maine	0	0	0	0	0	0	0	0	
Maryland	2	0	3	0	1	0	0	0	
Massachusetts	0	0	0	0	4	0	1	0	
Mississippi	2	0	2	1	0	0	1	0	
New Hampshire	0	0	1	0	0	0	0	0	
New Jersey	2	0	0	0	0	0	0	0	
New York	4	0	10	0	3	0	3	1	
North Carolina	5	2	11	3	2	1	3	1	
Ohio	0	0	4	0	4	0	8	0	
Pennsylvania	2	0	8	0	4	1	2	0	
Puerto Rico	0	0	1	0	0	0	0	0	
Rhode Island	1	0	0	0	0	0	0	0	
South Carolina	0	13	4	5	1	3	2	1	
Tennessee	2	0	3	1	9	1	5	0	
Vermont	5	1	5	0	0	0	0	1	
Virginia	3	0	5	0	3	0	0	2	
West Virginia	1	0	2	1	1	0	0	0	
<b>Region Total</b>	<b>37</b>	<b>19</b>	<b>89</b>	<b>11</b>	<b>36</b>	<b>8</b>	<b>27</b>	<b>8</b>	
<i>Central</i>									
Arkansas	3	1	1	0	17	1	2	0	
Illinois	57	2	32	3	32	3	22	4	
Indiana	8	3	18	5	17	2	10	2	
Iowa	64	2	58	14	34	13	37	3	
Kansas	5	2	4	1	9	4	12	3	
Louisiana	5	5	4	3	2	3	1	1	
Michigan	3	5	4	6	5	1	4	2	
Minnesota	10	31	9	35	2	27	5	22	
Missouri	5	5	8	1	10	2	4	1	
Nebraska	19	7	31	4	31	5	17	8	
North Dakota	1	10	3	5	5	8	2	40	
Oklahoma	9	3	3	0	1	0	3	0	
South Dakota	0	3	2	9	1	4	3	2	
Texas	5	2	43	0	0	1	0	0	
Wisconsin	16	6	9	1	5	4	15	3	
<b>Region Total</b>	<b>210</b>	<b>87</b>	<b>229</b>	<b>87</b>	<b>171</b>	<b>78</b>	<b>137</b>	<b>91</b>	

	State	2004		2005		2006		2007	
		HEL	PV	HEL	HEL	HEL	PV	HEL	PV
<i>West</i>									
	Alaska	0	0	0	1	0	0	0	0
	Arizona	0	0	0	0	0	0	0	0
	California	1	0	6	1	17	0	2	0
	Colorado	2	0	7	0	1	0	4	0
	Hawaii	0	0	0	0	0	0	0	0
	Idaho	0	1	3	0	2	0	1	0
	Montana	5	0	2	0	2	0	2	0
	Nevada	1	0	0	0	0	0	0	0
	New Mexico	3	0	6	0	0	0	0	0
	Oregon	0	0	0	0	0	0	0	0
	Pacific Basin	0	0	0	0	0	0	0	0
	Utah	0	0	0	0	0	0	0	0
	Washington	8	0	1	0	1	0	4	0
	Wyoming	0	0	0	0	0	0	0	0
	<b>Region Total</b>	<b>20</b>	<b>1</b>	<b>25</b>	<b>2</b>	<b>23</b>	<b>0</b>	<b>13</b>	<b>0</b>
<b>National Total</b>		<b>267</b>	<b>107</b>	<b>343</b>	<b>100</b>	<b>230</b>	<b>86</b>	<b>177</b>	<b>99</b>

**Note:** Shaded areas represent 2 or more consecutive years with no violations and none this year.

## **Table 7: Compliance Review Determination Codes and Definitions**

- AA – Actively applying an approved conservation plan – An approved conservation plan is being applied on all HEL fields on the tract, or an approved conservation plan is being applied on some HEL fields on the tract, and the previously treated HEL field(s) is/are using an approved conservation system or systems.
- AC – Variance because of severe and unusual conditions - Applying an approved conservation plan or using an approved conservation system with a temporary variance. The temporary variance should be due to special conditions, including severe weather, pests, or disease which prohibited or changed the application of the required scheduled conservation practices.
- AE – Variance because of economic hardship – Applying an approved conservation plan or using an approved conservation system with an exemption based on economic hardship as determined by the FSA County Committee and approved by the State Committee.
- AG – Exemption based on a Good Faith Determination – Applying an approved conservation system with an exemption based on a good faith determination by the FSA County Committee.
- AH – Variance because of extreme personal hardship – Applying an approved conservation plan or using an approved conservation system with a variance because of a special problem, technical error, incorrect plan, or unusual occurrence prohibited the application of the required scheduled practice(s).
- AM – Variance with a minimal or technical effect – Applying an approved conservation system with a variance based on failure which is technical and minor in nature.
- CA – Conditionally applying an approved conservation plan or system. Used if compliance review cannot be finalized due to either (a) major maintenance of structural measures is required or (b) planned structural conservation practices are scheduled to be installed.
- EX – Exemption(s) used for tract(s) where review is limited to a specific field, either from a prior year variance or agency referral.
- NA – Not actively applying an approved conservation plan or using an approved conservation system.
- NN – No conservation plan is required. There are no HEL fields on the tract, the tract is not planted to an agricultural commodity, or the tract is not in agriculture use.
- PV – Potential and/or suspected wetland violation in the field/tract.
- TA – Exemption(s) used for tract(s) when deficiencies are found while providing technical assistance.
- UA – All of the conservation plan practices or the approved conservation systems are being maintained to the required specifications and standards.

**Table 8: Replaced Tracts Summary**

<b>Replaced Tracts Summary by Region in 2007</b>					
<b>Region</b>	<b>State</b>	<b>Sample Tracts</b>	<b>Added Tracts</b>	<b>Replaced Tracts</b>	<b>Percent Replaced</b>
<i>East</i>					
	Alabama	46	37	5	6.0%
	Connecticut	10	9	2	10.5%
	Delaware	13	4	1	5.9%
	Florida	40	14	6	11.1%
	Georgia	125	16	6	4.3%
	Kentucky	561	506	175	16.4%
	Maine	10	2	0	0.0%
	Maryland	71	52	2	1.6%
	Massachusetts	3	33	1	2.8%
	Mississippi	217	18	3	1.3%
	New Hampshire	4	1	0	0.0%
	New Jersey	15	35	2	4.0%
	New York	209	86	17	5.8%
	North Carolina	319	140	27	5.9%
	Ohio	337	59	24	6.1%
	Pennsylvania	330	33	10	2.8%
	Puerto Rico	0	1	0	0.0%
	Rhode Island	0	5	0	0.0%
	South Carolina	46	22	2	2.9%
	Tennessee	410	788	39	3.3%
	Vermont	17	33	0	0.0%
	Virginia	203	85	13	4.5%
	West Virginia	22	68	10	11.1%
	<b>Region Total:</b>	<b>3,008</b>	<b>2,047</b>	<b>345</b>	<b>6.8%</b>
<i>Central</i>					
	Arkansas	77	73	0	0.0%
	Illinois	817	517	102	7.6%
	Indiana	474	246	12	1.7%
	Iowa	1000	628	41	2.5%
	Kansas	576	684	59	4.7%
	Louisiana	110	9	8	6.7%
	Michigan	434	149	36	6.2%
	Minnesota	709	188	40	4.5%
	Missouri	749	253	95	9.5%
	Nebraska	902	430	84	6.3%
	North Dakota	963	323	45	3.5%
	Oklahoma	424	178	22	3.7%
	South Dakota	736	275	13	1.3%
	Texas	618	262	71	8.1%
	Wisconsin	733	462	77	6.4%
	<b>Region Total:</b>	<b>9,322</b>	<b>4,677</b>	<b>705</b>	<b>5.0%</b>

Region	State	Sample Tracts	Added Tracts	Replaced Tracts	Percent Replaced
<i>West</i>	Alaska	0	0	0	0.0%
	Arizona	2	7	0	0.0%
	California	37	16	4	7.5%
	Colorado	250	394	20	3.1%
	Hawaii	0	1	0	0.0%
	Idaho	155	153	13	4.2%
	Montana	597	166	12	1.6%
	Nevada	3	20	4	17.4%
	New Mexico	50	16	7	10.6%
	Oregon	51	13	2	3.1%
	Pacific Basin	0	1	0	0.0%
	Utah	18	28	0	0.0%
	Washington	134	42	4	2.3%
	Wyoming	38	24	4	6.5%
	<b>Region Total:</b>		<b>1,335</b>	<b>881</b>	<b>70</b>
<b>Grand Total:</b>		<b>13,665</b>	<b>7,605</b>	<b>1,120</b>	<b>5.3%</b>

States that replaced more than 10 percent of their total tracts in 2007 are highlighted in yellow. This is a reduction from shading 25 percent in 2006 and 40 percent for year 2005 with approximately the same number of States shaded.

The change in the selection process reduced the number of replaced tracts from 2006 to 2007 by approximately 75 percent from over 4,400 in 2006 to the 1,120 in 2007. The national percentage of replaced tracts dropped from 16.7 percent in 2006 to 5.3 percent in 2007.

**Table 9: Variance Determination Tract Summary For 2007**

Region	State	AC	AE	AG	AH	AM	CA	EX	TA	Total	
<i>East</i>	Alabama	0	0	1	0	0	0	0	0	1	
	Connecticut	1	0	0	0	1	0	0	0	2	
	Delaware	0	0	0	0	0	0	0	0	0	
	Florida	0	0	0	0	0	0	0	0	0	
	Georgia	0	0	0	0	1	1	0	0	2	
	Kentucky	13	0	0	1	14	1	0	3	32	
	Maine	0	0	0	0	0	0	0	0	0	
	Maryland	1	1	0	0	0	0	0	0	2	
	Massachusetts	0	0	0	0	0	0	0	0	0	
	Mississippi	0	1	0	0	0	0	0	0	1	
	New Hampshire	0	0	0	0	0	0	0	0	0	
	New Jersey	0	0	0	0	0	0	0	0	0	
	New York	0	0	0	0	1	7	0	8	16	
	North Carolina	0	0	9	0	5	1	0	0	15	
	Ohio	2	0	0	1	1	4	0	0	8	
	Pennsylvania	2	0	1	3	14	5	0	1	26	
	Puerto Rico	0	0	0	0	0	0	0	0	0	
	Rhode Island	0	0	0	0	0	0	0	0	0	
	South Carolina	0	0	0	0	0	11	0	0	11	
	Tennessee	1	1	0	2	2	0	0	1	7	
Vermont	1	0	0	0	0	0	0	0	1		
Virginia	0	0	0	1	0	2	0	0	3		
West Virginia	0	0	0	0	0	0	0	0	0		
	<b>Region Total</b>	<b>21</b>	<b>3</b>	<b>11</b>	<b>8</b>	<b>39</b>	<b>32</b>	<b>0</b>	<b>13</b>	<b>127</b>	
<i>Central</i>	Arkansas	0	0	0	0	0	0	0	0	0	
	Illinois	3	0	10	1	30	5	0	2	51	
	Indiana	8	0	0	0	0	0	0	1	9	
	Iowa	23	0	47	4	149	8	1	13	245	
	Kansas	3	0	0	0	0	51	0	0	54	
	Louisiana	0	0	0	0	0	0	0	0	0	
	Michigan	0	0	0	0	0	6	0	0	6	
	Minnesota	6	0	0	0	17	1	1	0	25	
	Missouri	5	0	4	0	1	3	1	2	16	
	Nebraska	4	0	16	12	52	2	3	1	90	
	North Dakota	1	0	0	0	0	0	1	1	3	
	Oklahoma	2	0	0	0	9	0	0	0	11	
	South Dakota	15	0	0	1	0	0	0	0	16	
	Texas	1	1	0	1	9	0	0	0	12	
	Wisconsin	1	0	0	1	36	8	0	2	48	
		<b>Region Total:</b>	<b>72</b>	<b>1</b>	<b>77</b>	<b>20</b>	<b>303</b>	<b>84</b>	<b>7</b>	<b>22</b>	<b>586</b>

Region	State	AC	AE	AG	AH	AM	CA	EX	TA	Total
<i>West</i>	Alaska	0	0	0	0	0	0	0	0	0
	Arizona	0	0	0	0	0	0	0	0	0
	California	0	0	0	0	0	1	0	0	1
	Colorado	13	0	0	1	0	4	0	0	18
	Hawaii	0	0	0	0	0	0	0	0	0
	Idaho	1	0	0	0	5	0	0	1	7
	Montana	0	0	0	0	0	0	0	1	1
	Nevada	0	0	0	0	0	1	0	0	1
	New Mexico	1	0	0	0	0	0	0	0	1
	Oregon	0	0	0	0	0	0	0	0	0
	Pacific Basin	0	0	0	0	0	0	0	0	0
	Utah	1	0	0	2	0	0	0	0	3
	Washington	0	0	0	1	0	0	0	0	1
	Wyoming	0	0	0	0	0	0	0	0	0
	<b>Region Total</b>	<b>16</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>0</b>	<b>2</b>	<b>33</b>
<b>2007 Totals</b>		<b>109</b>	<b>4</b>	<b>88</b>	<b>32</b>	<b>347</b>	<b>122</b>	<b>7</b>	<b>37</b>	<b>746</b>

% EAST	19%	75%	13%	25%	11%	26%	0%	35%	17%
% CENTRAL	66%	25%	88%	63%	87%	69%	100%	59%	79%
% WEST	15%	0%	0%	13%	1%	5%	0%	5%	4%