

Agriculture, Rural
Development, Food and
Drug Administration,
and Related Agencies

Repeal the USDA Catfish Inspection Program

RECOMMENDATION

Repeal the U.S. Department of Agriculture’s (USDA’s) catfish inspection program. This proposal saves \$14 million in FY 2018.

RATIONALE

While the Food and Drug Administration (FDA) regulates domestic and imported seafood, the 2008 farm bill created a special exception requiring the USDA to regulate catfish that is sold for human consumption. This program, which has not yet been implemented, would impose costly duplication because facilities that process seafood, including catfish, would be required to comply with both FDA *and* USDA regulations.

The evidence does not support the health justifications for the more intrusive inspection program, to which there has been wide bipartisan opposition. The Government Accountability Office (GAO) has criticized the program, publishing a 2012 report with the not-so-subtle title “Seafood Safety: Responsibility for Inspecting Catfish Should Not Be Assigned to USDA.”¹ Another GAO report succinctly summarized most of the problems, noting that the program “would result in duplication of federal

programs and cost taxpayers millions of dollars annually without enhancing the safety of catfish intended for human consumption.”²

The USDA catfish inspection program would also have serious trade implications. Foreign countries that want to export catfish to the U.S. would need to establish a new regulatory system equivalent to the USDA program. If these countries do not meet the USDA’s requirements, foreign exporters from countries that currently supply the United States with catfish will be blocked from doing so. This approval process could take years. Catfish-exporting countries would likely retaliate with—and win—trade disputes, since the program would be an unjustified trade barrier. The retaliation would likely be against industries other than the catfish industry, such as milk producers or meat packers. American consumers would also suffer, as this program would reduce competition.

ADDITIONAL READING

- Daren Bakst, “House Leadership Should Allow a Vote Against Cronyism,” *The Daily Signal*, September 19, 2016.
- Daren Bakst, “Senate Votes to End a Textbook Crony Program,” *The Daily Signal*, May 26, 2016.
- Daren Bakst, “Addressing Waste, Abuse, and Extremism in USDA Programs,” Heritage Foundation *Backgrounder* No. 2916, May 30, 2014.
- Daren Bakst, “Farm Bill: Taxpayers and Consumers Are Getting Catfished,” *The Daily Signal*, November 19, 2013.
- U.S. Government Accountability Office, “High Risk Series: An Update,” GAO-13-283, February 2013, pp. 198-199.
- U.S. Government Accountability Office, “Seafood Safety: Responsibility for Inspecting Catfish Should Not Be Assigned to USDA,” GAO-12-411, May 2012.

CALCULATIONS

As reported in U.S. Government Accountability Office, “Seafood Safety: Responsibility for Inspecting Catfish Should Not Be Assigned to USDA,” *Report to Congressional Requesters*, GAO-12-411, May 2012, pp. 19 and 20, the proposed catfish program would cost the federal government and industry an estimated \$14 million annually, with the federal government bearing 98 percent of the cost. This GAO report notes that the reported estimate of \$14 million annually may understate the true costs of the program.

Eliminate the Conservation Technical Assistance Program

RECOMMENDATION

Eliminate the Conservation Technical Assistance Program. This proposal saves \$750 million in FY 2018.

RATIONALE

The Natural Resources Conservation Service runs a costly program to offer technical assistance to landowners on natural resource management. This assistance includes help in maintaining private lands, complying with laws, enhancing recreational activities, and improving the aesthetic character of

private land. Private landowners, not government, are the best stewards of a given property. If necessary, they can seek private solutions to conservation challenges. Federal taxpayers should not be forced to subsidize advice that landowners should be paying for on their own.

ADDITIONAL READING

- Daren Bakst, "Addressing Waste, Abuse, and Extremism in USDA Programs," Heritage Foundation *Backgrounder* No. 2916, May 30, 2014.

CALCULATIONS

Savings is expressed as budget authority and was calculated using the FY 2016 estimated spending level of \$752 million as found in USDA, "FY 2017: Budget Summary and Annual Performance Plan, U.S. Department of Agriculture," p. 63. This estimate assumes that the FY 2016 spending level holds constant in FY 2017 and decreases at the same rate as discretionary spending in FY 2018 (-0.32 percent), according to the CBO's most recent August 2016 baseline spending projections.

Eliminate the Rural Business Cooperative Service

RECOMMENDATION

Eliminate programs in the Rural Business Cooperative Service (RBCS). This proposal saves \$105 million in FY 2018.

RATIONALE

The RBCS is an agency of the U.S. Department of Agriculture that has a wide range of financial assistance programs for rural businesses. It also has a significant focus on renewable energy and global warming, including subsidizing biofuels. Rural businesses are fully capable of running themselves, investing, and seeking assistance through private means. The fact that these businesses are in rural areas does not change the fact that they can and

should succeed on their own merits like any other business. Private capital will find its way to worthy investments. The government should not be in the business of picking winners and losers when it comes to private investments or energy sources. Instead of handing taxpayer dollars to businesses, the federal government should identify and remove the obstacles that it has created for businesses in rural communities.

ADDITIONAL READING

- Daren Bakst, "Addressing Waste, Abuse, and Extremism in USDA Programs," Heritage Foundation *Backgrounder* No. 2916, May 30, 2014.

CALCULATIONS

Savings are expressed on budget authority based on the CBO's most recent August 2016 baseline spending projections. Savings include \$105 million in discretionary spending and \$68 million in mandatory spending.

Prohibit Funding for National School Meal Standards and the Community Eligibility Provision

RECOMMENDATION

Prohibit funding for national school meal standards and the community eligibility provision. This proposal has no savings for FY 2018.

RATIONALE

The U.S. Department of Agriculture's school-meal standards for the Healthy, Hunger-Free Kids Act of 2010 have been a failure. These standards are a burden on schools and have resulted in many negative outcomes. A September 2015 GAO report on the school lunch program shows that since the implementation of the new standards, participation in the school lunch program has declined, and food waste remains a significant problem. As reported, some schools have dropped out of the school lunch program at least partially due to the new standards.³ The new standards have also imposed greater costs on schools, such that some have even had to draw from their education funds to cover the new costs.⁴ No funding should be directed toward implementation or enforcement of these standards. Any new standards should give states and local educational authorities much greater flexibility and respect the role of parents in helping their children make dietary decisions.

The community eligibility provision is a new policy that was implemented by the Healthy, Hunger-Free Kids Act. It expands free school meals to students regardless of family income. Under this provision, if 40 percent of students in a school, group of schools, or school district are identified as eligible for free meals because they receive benefits from another means-tested welfare program like food stamps, then all students can receive free meals. The community eligibility provision is essentially a back-door approach to universal school meals. Schools should not be providing welfare to middle-class and wealthy students. Ending the community eligibility provision would ensure that free meals are going only to students from low-income families. No further funding should be directed toward implementing this provision.

ADDITIONAL READING

- Daren Bakst, "Addressing Waste, Abuse, and Extremism in USDA Programs," Heritage Foundation *Backgrounder* No. 2916, May 30, 2014.
- Daren Bakst, "Michelle Obama Is Ignoring the Problems Her New School Lunch Standards Have Caused," The Daily Signal, May 30, 2014.
- Rachel Sheffield and Daren Bakst, "Child Nutrition Reauthorization: Time for Serious Reform, Not Tinkering," Heritage Foundation *Issue Brief* No. 4570, May 26, 2016.
- Daren Bakst and Rachel Sheffield, "Congress Shouldn't Push Obama's Flawed Child Nutrition Policy on Children," The Daily Signal, January 25, 2016.
- Daren Bakst and Rachel Sheffield, "Getting the Facts Straight on School Meals and Child Nutrition Reauthorization," Heritage Foundation *Issue Brief* No. 4622, November 3, 2016.
- Daren Bakst and Rachel Sheffield, "School Lunch Program: No Wealthy Child Left Behind," The Daily Signal, May 15, 2016.

CALCULATIONS

Ending funding and enforcement for the new standards would generate savings for state and local governments. The effects of these proposals on federal spending are uncertain so Heritage does not include estimated savings for FY 2018.

Withhold Funding for Federal Fruit and Vegetable Supply Restrictions

RECOMMENDATION

Withhold funding for federal fruit-supply and vegetable-supply restrictions. This proposal has no savings in FY 2018.

RATIONALE

In June 2015, the United States Supreme Court decided *Horne v. Department of Agriculture*,⁵ a case regarding the federal government’s authority to fine raisin growers who did not hand over part of their crop to the government. The court held that forcing growers to turn over their raisins was a taking of private property requiring just compensation. While the “raisin case” received much attention because of the outrageous nature of the government’s actions, it is far from unique. In particular, the USDA uses its power to enforce a number

of cartels through industry agreements known as marketing orders. Fruit and vegetable marketing orders⁶ allow the federal government to authorize supply restrictions (volume controls), limiting the amounts that agricultural producers may sell. Marketing orders are bad enough, but, at a minimum, Congress should stop funding these volume controls that limit how much of their own fruits and vegetables farmers may sell, and should get the government out of the market and cartel management business.⁷

ADDITIONAL READING

- Alden Abbott, “Time to Repeal Agricultural Marketing Orders,” Heritage Foundation *Backgrounder* No. 3054 December 3, 2015.
- Daren Bakst, “The Federal Government Should Stop Limiting the Sale of Certain Fruits and Vegetables,” Heritage Foundation *Issue Brief* No. 4466, September 29, 2015.
- Elayne Allen and Daren Bakst, “How the Government Is Mandating Food Waste,” The Daily Signal, August 19, 2016.

Repeal the Agricultural Risk Coverage and Price Loss Coverage Programs

RECOMMENDATION

Repeal the Agricultural Risk Coverage (ARC) and Price Loss Coverage (PLC) programs. This proposal saves \$8.014 billion in FY 2018.

RATIONALE

The ARC and PLC programs are two major new commodity programs that Congress added in the 2014 farm bill. Essentially, the two programs attempt to insulate farmers from market forces by guaranteeing against lower-than-expected revenue and against price changes.

The ARC program protects farmers from shallow losses (minor dips in expected revenue), providing payments when their actual revenues fall below 86 percent of the expected revenues for their crops. The PLC program provides payments to farmers when commodity prices fall below a fixed reference price established by statute. On a crop-by-crop basis, farmers can participate either in the ARC program or in the PLC program. These programs go far beyond providing a safety net for farmers. Instead, the pretext of a safety net is used to prevent many agricultural producers from competing in the market like other businesses.

The PLC program provides protection against minor dips in revenue, including those that could be attributed to normal business risk. The PLC program has such high reference prices that, even at the time of passage of the 2014 farm bill, payments were likely right from the outset for some commodities. Policymakers need to allow farmers to freely compete in the marketplace, and reap the financial reward of being more efficient and better managed than their competitors. In other words, they should be allowed to operate just like any other business.

Congress should repeal both programs because they go way beyond any concept of a safety net. At most, the taxpayer-funded safety net should only protect farmers from deep yield losses, not insulate farmers from minor dips in revenue and market forces such as prices. This proposal would save \$9.618 billion dollars in FY 2018.

ADDITIONAL READING

- Daren Bakst et al., "Farms and Free Enterprise: A Blueprint for Agricultural Policy," The Heritage Foundation, *Mandate for Leadership Report*, September 21, 2016.
- Daren Bakst, Josh Sewell, and Brian Wright, "Addressing Risk in Agriculture," Heritage Foundation *Special Report* No. 189, September 8, 2016.

CALCULATIONS

Savings are expressed as budget authority as projected in the CBO's March 2016 baseline spending projections. Projections for the ARC and PLC can be found in Congressional Budget Office, "CBO's March Baseline for Farm Programs," March 24, 2016, <https://www.cbo.gov/sites/default/files/recurringdata/51317-2016-03-usda.pdf> (accessed February 6, 2017). Estimated savings of \$8.014 billion in FY 2018 include \$2.521 billion for the PLC (p. 6); \$5.42 billion for the ARC-CO (county) (p. 6); and \$66 million for the ARC-IC (individual coverage) (p. 9). All \$8.014 billion in savings represent mandatory spending.

Include Work Requirement for Able-Bodied Adult Food Stamp Recipients

RECOMMENDATION

Reform the food stamps program to include a work requirement for able-bodied adults. Able-bodied adults must work, prepare for work, or look for work for a minimum number of hours each month in order to receive benefits. This proposal saves \$9.7 billion in FY 2018.

RATIONALE

The food stamp program is the nation's second-largest of the government's roughly 90 means-tested welfare programs. The number of food stamp recipients has risen dramatically from about 17.2 million in 2000 to 44.2 million in 2016. Costs have risen from \$19.8 billion in FY 2000 to \$83.0 billion in FY 2015.

Food stamp assistance should be directed to those most in need. Able-bodied adults who receive food stamps should be required to work, prepare for work, or look for work in exchange for receiving assistance. Not only do work requirements help ensure that food stamps are directed to those who need them most, a work requirement also promotes the principle of self-sufficiency by directing individuals toward work.

ADDITIONAL READING

- Robert Rector, Rachel Sheffield, and Kevin Dayaratna, "Maine Food Stamp Work Requirement Cuts Non-Parent Caseload by 80 Percent," Heritage Foundation *Backgrounder* No. 3091, February 8, 2016.
- Robert Rector and Rachel Sheffield, "Setting Priorities for Welfare Reform," Heritage Foundation *Issue Brief* No. 4520, February 24, 2016.

CALCULATIONS

Savings of \$9.7 billion per year come from analysis contained in Robert Rector, Rachel Sheffield, and Kevin Dayaratna, "Maine Food Stamp Work Requirement Cuts Non-Parent Caseload by 80 Percent," Heritage Foundation *Backgrounder* No. 3091, February 8, 2016, <http://www.heritage.org/research/reports/2016/02/maine-food-stamp-work-requirement-cuts-non-parent-caseload-by-80-percent>. All \$9.7 billion in savings represent mandatory spending.

End Broad-Based Categorical Eligibility for Food Stamps

RECOMMENDATION

Broad-based categorical eligibility allows states to loosen income limits for potential food stamp recipients and bypass asset tests. This policy should be eliminated. This proposal saves \$1.275 billion in FY 2018.

RATIONALE

Categorical eligibility traditionally allows individuals who receive cash welfare assistance—from programs such as Temporary Assistance for Needy Families (TANF)—to automatically enroll in food stamps. Now, a policy known as “broad-based categorical eligibility” provides a loophole that allows states to loosen income limits and bypass asset tests for potential food stamp recipients. Under broad-based categorical eligibility, individuals or families can simply receive some type of TANF “service” and become automatically categorically eligible for food stamps. A “service” can be something as simple as receiving a brochure from a TANF office. Because TANF services are available

to households with incomes higher than those eligible for TANF cash assistance, states are able to extend food stamp benefits to those with higher incomes than otherwise would be permissible.

Furthermore, broad-based categorical eligibility allows states to entirely waive asset tests. An individual with temporary low income can receive a TANF service and then become categorically eligible for food stamps, even if he has a large amount of savings. Policymakers should end broad-based categorical eligibility to ensure that food stamps are focused on helping those truly in need.

ADDITIONAL READING

- Rachel Sheffield, “How to Reform Food Stamps,” Heritage Foundation *Issue Brief* No. 4045, September 12, 2013.
- Daren Bakst and Rachel Sheffield, “Eight Things to Watch for in the Farm Bill,” Heritage Foundation *Issue Brief* No. 4101, December 4, 2013.

CALCULATIONS

Savings are expressed as budget authority as estimated by the CBO in its analysis of the impact of previously proposed legislation that would enact these reforms as found in Congressional Budget Office, “Cost Estimate for H.R. 3102, the Nutrition Reform and Work Opportunity Act of 2013,” September 16, 2013, <https://www.cbo.gov/sites/default/files/113th-congress-2013-2014/costestimate/hr31020.pdf> (accessed February 6, 2017). Heritage uses the CBO’s estimated 2014 savings because these represent the first year of implementation. All \$1.275 billion in savings represent mandatory spending.

Eliminate the “Heat and Eat” Loophole in Food Stamps

RECOMMENDATION

Eliminate the “heat and eat” loophole in food stamps. This proposal saves \$1.450 billion in FY 2018.

RATIONALE

A loophole known as “heat and eat” is a tactic that states have used to artificially boost a household’s food stamp benefit. The amount of food stamps a household receives is based on its “countable” income—income minus certain deductions. Households that receive benefits from the Low-Income Heat and Energy Assistance Program (LIHEAP) are eligible for a larger utility deduction. In order to make households eligible for the higher deduction—and, thus, greater food stamp benefits—states have

distributed LIHEAP checks for amounts as small as \$1 to food stamp recipients. While the 2014 farm bill tightened this loophole by requiring that a household receive greater than \$20 annually in LIHEAP payments to be eligible for the larger utility deduction and subsequently higher food stamp benefits, some states have continued to utilize the loophole by paying over \$20 per year. Policymakers should close this loophole entirely.

ADDITIONAL READING

- Rachel Sheffield, “How to Reform Food Stamps,” Heritage Foundation *Issue Brief* No. 4045, September 12, 2013.
- Daren Bakst and Rachel Sheffield, “Eight Things to Watch for in the Farm Bill,” Heritage Foundation *Issue Brief* No. 4101, December 4, 2013.

CALCULATIONS

Savings are based on the estimated FY 2018 savings of \$1.450 billion reported for “Changes to SNAP Eligibility Requirements: Standard Utility Allowance,” as reported in Sequester Replacement Reconciliation Act of 2012, H.R. 5652, 112th Cong., p. 27, <https://www.gpo.gov/fdsys/pkg/CRPT-112hrpt470/pdf/CRPT-112hrpt470.pdf> (accessed February 6, 2017). All \$1.450 billion in savings represent mandatory spending.

Eliminate the Federal Sugar Program

RECOMMENDATION

Eliminate the federal sugar program. This proposal has no savings in FY 2018.

RATIONALE

The federal sugar program uses price supports and marketing allotments that limit how much sugar processors can sell each year, as well as import restrictions. As a result of government intervention to limit supply, the price of American sugar is consistently higher (at times twice as high) than world prices.⁸

This program may benefit a small number of sugar growers and harvesters, but it does so at the expense of sugar-using industries and consumers.

An International Trade Administration report found: “For each sugar-growing and harvesting job saved through high U.S. sugar prices, nearly three confectionery manufacturing jobs are lost.”⁹ The program is also a hidden tax on consumers. Recent studies have found that the program costs consumers as much as \$3.7 billion a year.¹⁰ Such a program also has a disproportionate impact on the poor because a greater share of their income goes to food purchases than for individuals at higher income levels.

ADDITIONAL READING

- Daren Bakst et al., “Farms and Free Enterprise: A Blueprint for Agricultural Policy,” The Heritage Foundation, *Mandate for Leadership Report*, September 21, 2016.
- Daren Bakst, Josh Sewell, and Brian Wright, “Addressing Risk in Agriculture,” Heritage Foundation *Special Report* No. 189, September 8, 2016.

Eliminate Revenue-Based Crop Insurance Policies

RECOMMENDATION

Eliminate revenue-based crop-insurance policies. Although this proposal would likely save billions of dollars each year, Heritage does not include any savings for FY 2018. (See calculations below.)

RATIONALE

Any reasonable concept of a taxpayer-funded safety net for farmers would require a significant crop loss. Unfortunately, the current safety net, including the federal taxpayer-subsidized crop-insurance program, goes way beyond providing a safety net. The program does not require a disaster or even yield losses to have occurred for farmers to receive indemnities.

There are generally two types of federal crop-insurance policies: yield-based and revenue-based. A yield-based policy protects farmers from yields that are lower than expected due to events beyond the control of farmers, such as weather and crop disease. In 1997, revenue-based insurance became an option for farmers.¹¹ By 2003, more acreage was covered by these policies than yield-based policies.¹² In other words, these revenue-based policies have not been around a long time, and it has been only a little over 10 years since they have been more prominent than yield-based policies.

Revenue-based policies are more popular than yield-based policies because they do not require yield losses. They accounted for 77 percent of all policies earning premiums in 2014.¹³ Farmers can even have greater yields than expected and still receive indemnity payments if commodity prices are lower than expected. A revenue-based policy protects farmers from dips in expected revenue due to low prices, low yields, or both. The federal government should not be in the business of insuring price or revenue; agricultural producers, like other businesses, should not be insulated from market forces or guaranteed financial success at the expense of taxpayers.

This relatively new and overly generous type of taxpayer-subsidized crop insurance should be eliminated. *Farmers would still be able to purchase taxpayer-subsidized crop insurance*, but it would be limited to yield insurance as it has been in the past. Such a change would lead to major savings (likely in the billions).

ADDITIONAL READING

- Daren Bakst et al., “Farms and Free Enterprise: A Blueprint for Agricultural Policy,” The Heritage Foundation, *Mandate for Leadership Report*, September 21, 2016.
- Daren Bakst, Josh Sewell, and Brian Wright, “Addressing Risk in Agriculture,” Heritage Foundation *Special Report* No. 189, September 8, 2016.

CALCULATIONS

We do not yet include any estimated savings for FY 2018 because, absent an extensive analysis, many unknown factors remain that are necessary for providing a reasonable estimate. Among other factors, savings would be contingent on which coverage, if any, agricultural producers select as a result of this change.

Eliminate the Market Access Program

RECOMMENDATION

Eliminate the USDA's Market Access Program (MAP). This proposal saves \$185 million in FY 2018.

RATIONALE

MAP subsidizes trade associations, businesses, and other private entities to help them market and promote their products overseas. Under MAP, taxpayers have recently helped to fund international wine tastings, organic hair products for cats and dogs, and a reality television show in India. It is not government's role to advance the marketing interests of certain industries or businesses. Taxpayers should not be forced to subsidize the marketing that private businesses should do on their own.

ADDITIONAL READING

- Daren Bakst, "Addressing Waste, Abuse, and Extremism in USDA Programs," Heritage Foundation *Backgrounder* No. 2916, May 30, 2014.
- Daren Bakst, "Animated Squirrels, Prunes, and Doggie Hair Gel: Your Tax Dollars at Work," The Daily Signal, July 25, 2013.
- Senator Tom Coburn, "Treasure Map: The Market Access Program's Bounty of Waste, Loot and Spoils Plundered from Taxpayers," June 2012.

CALCULATIONS

Savings are expressed as budget authority as projected for FY 2018 in Congressional Budget Office, "CBO's March 2016 Baseline for Farm Programs," March 24, 2016, <https://www.cbo.gov/sites/default/files/recurringdata/51317-2016-03-usda.pdf> (accessed February 6, 2017). (The CBO's more recent August 2016 baseline projections did not include estimates for MAP). All \$185 million in savings represent mandatory spending.

ENDNOTES

1. U.S. Government Accountability Office, "Seafood Safety: Responsibility for Inspecting Catfish Should Not Be Assigned to USDA," GAO-12-411, May 2012, <http://www.gao.gov/products/GAO-12-411> (accessed February 2, 2017).
2. U.S. Government Accountability Office, "High Risk Series: An Update," GAO-13-283, February 2013, pp. 198-199.
3. U.S. Government Accountability Office, "School Nutrition: USDA Had Efforts Underway to Help Address Ongoing Challenges Implementing Changes in Nutrition Standards," GAO-15-656, September 14, 2015, <http://gao.gov/products/GAO-15-656> (accessed February 2, 2017).
4. Erik Wasso, "Michelle's Meals Turn Off the Kids," *The Hill*, May 21, 2014, <http://thehill.com/policy/finance/206734-michelles-meals-turn-off-the-kids> (accessed February 6, 2017).
5. *Horne v. Department of Agriculture*, 135 S. Ct. 2419 (2015), http://www.supremecourt.gov/opinions/14pdf/14-275_cOn2.pdf (accessed November 17, 2015).
6. These marketing orders cover fruits, vegetables, and specialty crops. See Agricultural Marketing Service, "Marketing Orders for Fruits, Vegetables, and Specialty Crops," U.S. Department of Agriculture, <http://www.ams.usda.gov/rules-regulations/moa/fv> (accessed November 17, 2015). There are also milk marketing orders, but they are different from fruit and vegetable marketing orders. See Agricultural Marketing Service, "Federal Milk Marketing Orders," U.S. Department of Agriculture, <http://www.ams.usda.gov/rules-regulations/moa/dairy> (accessed November 17, 2015).
7. Daren Bakst, "The Federal Government Should Stop Limiting the Sale of Certain Fruits and Vegetables," Heritage Foundation *Issue Brief* No. 4466, September 29, 2015, <http://www.heritage.org/research/reports/2015/09/the-federal-government-should-stop-limiting-the-sale-of-certain-fruits-and-vegetables>.
8. Agralytica, "Economic Effects of the Sugar Program Since the 2008 Farm Bill & Policy Implications for the 2013 Farm Bill," <http://sugarreform.org/wp-content/uploads/2013/06/AgralyticaEconomicEffectsPaperJune2013.pdf> (accessed August 4, 2016).
9. U.S. Department of Commerce, "Employment Changes in U.S. Food Manufacturing: The Impact of Sugar Prices," <http://trade.gov/media/Publications/pdf/sugar06.pdf> (accessed March 21, 2016).
10. Agralytica, "Economic Effects of the Sugar Program Since the 2008 Farm Bill & Policy Implications for the 2013 Farm Bill." See also John C. Beghin and Amani Elobeid, "The Impact of the U.S. Sugar Program Redux," Center for Agricultural and Rural Development at Iowa State University, May 2013, <http://www.card.iastate.edu/products/publications/synopsis/?p=1183> (accessed February 3, 2017).
11. Dennis A. Shields, "Federal Crop Insurance: Background," Congressional Research *Report to Congress*, August 13, 2015.
12. *Ibid.*, p. 10.
13. *Ibid.*