



Brief Farmers' Guide to USDA Shutdown: Legal Obligations of Farmers

December 2025 - Farmers' Legal Action Group, Inc. (FLAG)¹

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I. Introduction

A fifty-day shutdown of part of the federal government—including the United States Department of Agriculture (USDA)—started on October 1, 2025, and ended on November 12, 2025.⁵ The government reopened on November 13, 2025.

For many farmers, the USDA shutdown directly affected farming operations, payment of loans, payments to farmers, completing conservation practices, and other things. This short Farmers' Guide looks at the way the shutdown and the restart of USDA affects farmers.

Two things are the likely most important takeaways from this Guide.

First, farmers and ranchers doing business with USDA should contact USDA right away about their pending deadlines or other potentially affected obligations.

Second, certain USDA deadlines that farmers needed to meet during the shutdown have been extended. Others have not yet been extended and may not be. Sections III and IV provide details on the specific Farm Service Agency (FSA) deadline extensions that FLAG is currently aware of. Farmers should not trust rumors or promises—even from USDA officials—that other deadlines or requirements will be waived. Until USDA makes a public statement on these matters, nothing a farmer hears about these things can be relied on with confidence.

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⁵ An appropriations bill passed in the Senate on November 10, 2025. The House of Representatives passed the Senate's bill on November 12th, 2025. The President signed on November 12, 2025. See Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extension Act, 2026, Public Law 119-37, available for download at: <https://www.congress.gov/bill/119th-congress/house-bill/5371>.

A. Contact USDA Right Away

Any farmer with ongoing business with USDA should contact USDA right away to make sure the farmer meets all USDA obligations and to find out how USDA plans to act in ways that affect the farmer.

B. Document Interactions With USDA

Farmers should document every communication with USDA. Farmers also should ask for a “receipt for service” regarding any communication for matters of importance.⁶ These are available for Farm Service Agency (FSA), Natural Resources Conservation Service (NRCS), and Rural Development (RD).

Here are specific recommendations for different communication methods:

First, email is a good way to communicate with USDA because the sent email is timestamped and automatically saved in the emailer’s mailbox. Farmers should be sure to save these emails to a folder on a mail server or download the message.

Second, letters are also a good way to communicate. Farmers should be sure to keep a signed and dated hardcopy or a copy of the letter. A picture of the stamped or postmarked envelope is a good idea.

Third, faxing is a good way to communicate. Farmers should keep a signed and dated copy of both the faxed documents and the fax receipt.

Fourth, telephone conversations are a good way to communicate with USDA. Farmers should be sure to follow up in writing (email, letter, or fax) to summarize what was discussed and mention the date, time, and subject matter of the call.

C. Some—But Not All—Farmer Deadlines Are Extended

Some farmer deadlines have been extended by USDA. As noted above, Sections III and IV discuss the details of currently-known extensions by FSA. It is extremely important to know the new deadline and meet the new deadline.

Farmers should not expect USDA to be flexible on deadlines or other matters when USDA rules and public statements have not announced that flexibility.

D. Information Used in This Guide

This Guide relies on official federal statutes, USDA regulations, announcements in the Federal Register, internal USDA Handbooks, and internal Notices.⁷ Official public statements by USDA officials are used as well.

⁶ Receipt for service for FSA is explained in FSA Handbook, Receipt for Service, 1-RFS (July 1, 2022), at https://www.fsa.usda.gov/sites/default/files/documents/1-rfs_roo_a03.pdf. For a FLAG discussion, see <http://www.flaginc.org/publication/fsa-receipt-for-service-3/>.

⁷ For example, see FSA, Guidance for Resuming FLP Activities After the Lapse in Funding, Notice FLP-976 (November 13, 2025) (expires October 1, 2026), at https://www.fsa.usda.gov/Internet/FSA_Notice/flp_976.pdf.

When a situation is as confusing as this one, farmers should be careful not to rely on rumors, news of how other farmers may have been treated, and other news. While this information often can be correct, it can also be wrong.

E. More USDA Developments Coming

The end of the shutdown brings confusion and a period of adjustment as USDA reopens, and farmers and USDA begin to unravel the effects of the shutdown.

Much about how USDA will deal with the shutdown is still unknown. As more information becomes available, FLAG plans to update this Guide.

F. Collective Effort

This Guide was produced by Farmers' Legal Action Group, Inc. (FLAG), but it is the product of work by many others as well. Those providing specific help and comments include the Rural Coalition and the National Sustainable Agriculture Coalition (NSAC).

G. The Rest of This Guide

Section II provides brief background on the shutdown. Sections III and IV look at the ways USDA has announced changes in deadlines or policies as a result of the shutdown. Section III goes into more detail on these topics for FSA Farm Loan Programs. Section IV looks at changes to policies and deadlines for other FSA Farm Programs.

H. Many Effects of Shutdown Not Addressed

USDA has released information on a number of programs and how USDA plans to change policies and deadlines as a result of the shutdown. Many effects of the shutdown on USDA and farmers have not been discussed by USDA.

I. Current as of December 3, 2025

This Guide is current as of December 3, 2025.

II. Background

On October 1, 2025, a federal government partial “shutdown” began. The shutdown impacted large portions of USDA operations and staff. The shutdown ended on November 12, 2025, and the government reopened on November 13, 2025.⁸

A. Shutdown Impacts

A technical name for the shutdown is a “temporary closure resulting from lapse in government funding.”⁹ Local USDA offices were barely operating, and USDA did not meet its normal obligations and tasks. FSA did not process farmer loan payments. It did not endorse checks or release checks from proceeds of the sale of collateral. It did not correspond with farmers. This included correspondence with farmers by email, in person, in writing, or by phone.

⁸ Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extension Act, 2026, Public Law 119-37.

⁹ The federal government shutdown is the result of a lapse in federal appropriations by Congress. On October 1, 2025, Congress had not passed, and therefore the President had not signed into law, such a bill.

B. Furloughs

During the shutdown, thousands of USDA employees were “furloughed.” A furlough, according to the federal government, means an employee is placed in a “temporary nonduty, nonpay status.”¹⁰ The two main agencies that serve farmers and ranchers are the Farm Service Agency (FSA) and the Natural Resources Conservation Service (NRCS). USDA planned to furlough about two-thirds of all FSA workers.¹¹ USDA planned to furlough about 95 percent of all NRCS employees.¹²

C. The Act that Ended the Shutdown (P.L. 119-37)

On November 12, 2025, Congress passed, and the President signed into law, Public Law No. 119-37, which established continuing appropriations to fund federal government operations until January 30, 2026.¹³ This Act did other things as well, including providing funding for USDA for a full year. This extension of funding and its effects on farmers are not discussed in this Guide.

III. FSA Farm Loan Programs

The following subsections discuss the way the shutdown affected FSA Farm Loan Programs and the way FSA has announced it will change policies or deadlines in Farm Loan Programs as a result of the shutdown. Any deadline or policy not mentioned in the next sections should be assumed by farmers to still be in place unmodified. Farmers should be sure to ask FSA about all programs that the farmer participates in or is interested in to see if any other changes have occurred.

An internal Notice issued by FSA sets some of the rules to be applied to farmers that either had an FSA Farm Loan Program Loan or were applying for one during the shutdown.¹⁴

A. FSA Direct Loans—Loan Making

The next sections discuss loan making in FSA's Farm Loan programs.

(1) Now Processing Loan Applications

FSA says it is now processing all loan requests received after the beginning of the shutdown on September 30, 2025.¹⁵ USDA is using either the postmarked date or the date the application was hand-delivered to the office as the receipt date.

¹⁰ USDA, Lapse of Funding Plan (as of September 30, 2025) at 5, available at <https://www.agripulse.com/ext/resources/2025/09/30/fy2026-usda-lapse-plan.pdf>. For how furloughs work see, United States Office of Personnel Management, Guidance for Shutdown Furloughs (September 2025), at <https://www.opm.gov/policy-data-oversight/pay-leave/reference-materials/guidance-for-shutdown-furloughs-sep-28-2025/>

¹¹ USDA, Lapse of Funding Plan (as of September 30, 2025) at 10.

¹² USDA, Lapse of Funding Plan (as of September 30, 2025) at 12.

¹³ Continuing Appropriations, Agriculture, Legislative Branch, Military Construction and Veterans Affairs, and Extension Act, 2026, Public Law 119-37, available for download at: <https://www.congress.gov/bill/119th-congress/house-bill/5371>.

¹⁴ FSA, Guidance for Resuming FLP Activities After the Lapse in Funding (“Resuming FLP Activities”), Notice FLP-976 (November 13, 2025) (expires October 1, 2026), at https://www.fsa.usda.gov/Internet/FSA_Notice/flp_976.pdf.

¹⁵ FSA, Resuming FLP Activities, Notice FLP-976, para. 2A, page 2 (November 13, 2025).

(2) Extension of Application Deadlines

FSA says that “no applicant will be penalized because of the lapse of funding.”¹⁶ By this FSA seems to mean deadlines for farmer actions that were missed because of the shutdown.

(3) Completing Applications

If, after a farmer applies to FSA for a loan, the application is missing certain documents, FSA will reach out and ask for more information.¹⁷ This usually comes in a letter.

(a) Applications Completed During Shutdown

If a farmer submitted the information needed to complete an application in response to an incomplete letter during the shutdown, the application will be processed.¹⁸ FSA is to process the farmer information based on the postmarked date or when it was hand-delivered.

(b) Applications Due During Shutdown but Not Completed

Some farmers applying for a loan were told by FSA that more information was needed, and the deadline for the farmer to give FSA the information turned out to be during the shutdown.

If a farmer applying for an FSA loan did not respond or did not submit all the needed information when the information was due during the shutdown, the farmer will be sent a new letter explaining what is needed for the application.¹⁹ The farmer then has fifteen calendar days from the date the new letter is sent to provide any missing information and complete the application.

(c) Dated Financial Information

Normal FSA rules set limits for how old financial information for a borrower can be when FSA makes a loan. In general, information that a farmer gives has what FSA calls a ninety day “expiration.”²⁰

Due to the shutdown, the ninety-day expiration date has been extended to 133 days for any application received by FSA before November 13, 2025.²¹

(d) Term Limits

Term limit rules for FSA loans set time limits on the total time—typically years—that a farmer can have outstanding FSA farm ownership and operating loans.²²

¹⁶ FSA, Resuming FLP Activities, Notice FLP-976, para. 2A, page 2 (November 13, 2025).

¹⁷ See FSA Handbook, 3-FLP, Direct Loan Making, paras. 42, 45, pages 3-4 to 3-10, 3-14 to 3-18 (August 21, 2025).

¹⁸ FSA, Resuming FLP Activities, Notice FLP-976, para. 2B, page 2 (November 13, 2025).

¹⁹ FSA, Resuming FLP Activities, Notice FLP-976, para. 2B, page 2 (November 13, 2025).

²⁰ FSA, Resuming FLP Activities, Notice FLP-976, para. 2B, page 2 (November 13, 2025); FSA, Direct Loan Making, para. 42.B page 3-10 (September 21, 2024).

²¹ FSA, Resuming FLP Activities, Notice FLP-976, para. 2B, page 2 (November 13, 2025).

²² Term limits are described in FSA Handbook, 3-FLP, Direct Loan Making, paras. 132.E, 202.D, pages 7.6 to 7.6.5, 9.8 to 9.9 (August 21, 2025). See also 7 C.F.R. §§ 764.152(f)(2), 7 C.F.R. § 764.252(e).

FSA says certain limits cannot be extended for any reason, including the government shutdown.²³

For some farmers, the term limits were about to take effect before the shutdown. The cutoff for term limit eligibility for a loan says that if a loan is not closed before a certain date the farmer is not eligible for the loan. The shutdown prevented loans from being closed. This means that the shutdown could have turned a borrower who was eligible for a loan into one who is suddenly not eligible as a result of the term limit rules. FSA says a farmer who now has exceeded the term limit—because of the government shutdown—is not eligible for the loan even if the loan had been approved and obligated before the shutdown.²⁴

B. FSA Direct Loans—Loan Servicing

The following sections discuss the servicing of FSA direct loans.

(1) Loan Servicing Starts Again

FSA says that all servicing of FSA direct loans is moving forward.²⁵

(2) Credit for Farmer Payments

Some farmers made payments on a loan during the shutdown. FSA will credit the payment on the day the payment was received.²⁶ If FSA does not know when the payment was received, FSA will use the postmark date as the day received.

(3) Timing of Loan Delinquency

If a farmer had a loan payment due during the shutdown and the farmer did not make a payment to bring the account current, FSA will consider the farmer delinquent on the loan as of November 13, 2025.²⁷ FSA will consider the farmer ninety days past due on February 11, 2026. Important loan servicing opportunities and notices for the farmer are tied to these dates.²⁸

(4) Primary Loan Servicing (PLS)

Some farmers had primary loan servicing options that were affected by the shutdown. Several possibilities are addressed in the following sections.²⁹

²³ FSA, Resuming FLP Activities, Notice FLP-976, para. 2C, page 2 (November 13, 2025).

²⁴ FSA, Resuming FLP Activities, Notice FLP-976, para. 2C, page 2 (November 13, 2025).

²⁵ FSA, Resuming FLP Activities, Notice FLP-976, para. 2D, page 3 (November 13, 2025).

²⁶ FSA, Resuming FLP Activities, Notice FLP-976, para. 2B, page 3 (November 13, 2025).

²⁷ FSA, Resuming FLP Activities, Notice FLP-976, para. 2C, page 3 (November 13, 2025).

²⁸ See FSA Handbook, 5-FLP, Direct Loan Servicing – Special and Inventory Property Management, paras. 66-67, pages 3-2.5-3-4 (August 21, 2025), at https://www.fsa.usda.gov/Internet/FSA_File/5-flp_roo_a61.pdf.

²⁹ Primary Loan Servicing is described in FSA Handbook, 5-FLP, Direct Loan Servicing—Special and Inventory Property Management, paras. 131–172, pages 4-1 to 4-71 (August 21, 2025).

(a) PLS Deadlines Paused

Any deadlines that apply to Primary Loan Servicing are considered by FSA to have been “paused,” meaning stopped, during the shutdown.³⁰

(b) Borrower Was Current and Approved for PLS

If a farmer had loans that were current and were approved for Primary Loan Servicing before the shutdown (meaning on or before September 30, 2025), but the farmer became delinquent on the loan during the shutdown, the farmer will continue to be considered as a “current/distressed service restructuring.”³¹

(c) PLS Applications Received but Not Approved Before Shutdown

If a Primary Loan Servicing application has been received by FSA but was not approved before the shutdown, and the loan became past due during the shutdown, the farmer has an additional forty-three calendar days—from their original past-due date—to respond and complete the application.³²

(d) PLS Applications Sent by Farmer During Shutdown

Primary Loan Servicing applications received by FSA during the shutdown that became ninety days past due during the shutdown will receive a letter from FSA by certified mail.³³ It appears the farmer may need to reapply. Farmers should check with FSA.

(e) PLS Notice Sent, But No Farmer Response

Farmers that were ninety days past due on a loan and were sent Primary Loan Servicing notices before the shutdown, and who have not responded to the notices, will receive a new notice via regular mail from FSA.³⁴ The new notice will provide the farmer with forty-three calendar days, from the date of the mailing, to respond to the PLS notice and provide the required documentation. FSA will also try to contact the farmer by telephone.

(f) PLS Notice to Farmer Returned to FSA Unclaimed

If a farmer was ninety days past due and sent a Primary Loan Servicing notice before the shutdown, and the notice was returned unclaimed, the farmer will be notified again through regular mail.³⁵ Farmers in this situation will have forty-three calendar days, from the date of the new notice, to request PLS and provide the required documentation.

³⁰ FSA, Resuming FLP Activities, Notice FLP-976, para. 3D, page 3 (November 13, 2025).

³¹ FSA, Resuming FLP Activities, Notice FLP-976, para. 3D, page 3, (November 13, 2025). Distressed borrower servicing is described in FSA Handbook, 5-FLP, Direct Loan Servicing—Special and Inventory Property Management, paras. 41-58, pages 2-1 to 2-23 (August 21, 2025).

³² FSA, Resuming FLP Activities, Notice FLP-976, para. 3D, page 3, (November 13, 2025). The Notice also states that PLS must be able to be approved and closed within those additional forty-three calendar days.

³³ FSA, Resuming FLP Activities, Notice FLP-976, para. 3D, page 3, (November 13, 2025).

³⁴ FSA, Resuming FLP Activities, Notice FLP-976, para. 3D, page 3 (November 13, 2025).

³⁵ FSA, Resuming FLP Activities, Notice FLP-976, para. 3D, page 4 (November 13, 2025).

(g) PLS Deadlines Expired During Shutdown

Farmers who have Primary Loan Servicing-related deadlines that expired during the shutdown will be sent a notice that the deadline is extended forty-three calendar days from the date of the new notice.³⁶

(5) Disaster Set-Aside (DSA) and Distressed Borrower Set-Aside (DBSA)

FSA has several set-aside rules that assist farmers with direct FSA loans.³⁷ A set-aside moves an annual payment to the end of the term of the loan. Rules for Disaster Set Asides (DSA) and Distressed Borrower Set-Asides (DBSA) are somewhat different. Some new rules apply to both types of set asides. Some do not.

(a) Set-Aside Previously Approved

A farmer may have had a set-aside request approved, but not yet processed. If the loan was less than ninety days delinquent before the shutdown—on or before September 30, 2025—and became delinquent during the shutdown, the farmer is still eligible for the set-aside, and the set-aside can be completed.³⁸ This includes both disaster and distressed borrower set-asides.

(b) DSA Applications Not Yet Approved

A farmer may have applied for a disaster set-aside before the shutdown and then became ninety days delinquent during the shutdown. The farmer is eligible for the DSA if the farmer is less than 133 calendar days past due on a payment.³⁹ This is forty-three more days than the normal ninety-day requirement.

(c) FSA Responses to Existing Set-Aside Applications

FSA's response to an application for a set-aside that was received before the shutdown has a required response date.⁴⁰ Due to the shutdown that deadline is extended by forty-three calendar days.⁴¹

(d) Closing for Set-Aside Applications

A farmer may have applied for a set-aside before the shutdown. FSA can complete the closing of the set-aside if the loan is less than 208 calendar days past due.⁴² This is forty-three days more than the usual 165-day requirement.⁴³

³⁶ FSA, Resuming FLP Activities, Notice FLP-976, para. 3D, page 4 (November 13, 2025).

³⁷ Set asides are described in FSA Handbook, 5-FLP, Direct Loan Servicing—Special and Inventory Property Management, paras. 41–58, pages 2-1 to 2-23 (August 21, 2025).

³⁸ FSA, Resuming FLP Activities, Notice FLP-976, para. 3E, page 4 (November 13, 2025).

³⁹ FSA, Resuming FLP Activities, Notice FLP-976, para. 3E, page 4 (November 13, 2025).

⁴⁰ 7 C.F.R. § 766.55 (2025); FSA Handbook, 5-FLP, Direct Loan Servicing—Special and Inventory Property Management, para. 46, page 2-8 (August 21, 2025).

⁴¹ FSA, Resuming FLP Activities, Notice FLP-976, para. 3E, page 4 (November 13, 2025).

⁴² FSA, Resuming FLP Activities, Notice FLP-976, para. 3E, page 4 (November 13, 2025).

⁴³ Under the regulations for set-asides, a borrower cannot become 165 days past due on their loan before FSA closes on the loan. 7 C.F.R. § 766.52(a)(8) (2025); FSA Handbook, 5-FLP, Direct Loan Servicing—Special and Inventory Property Management, para. 45, page 2-5 (August 21, 2025).

(e) DSA Applications Submitted During Shutdown, and After

FSA can now process DSA applications received during the shutdown.⁴⁴ For these applications, the eight-month disaster designation expiration for the application will be based on the date the application was received by FSA or the date it is postmarked, if the office was closed.

DSA applications received after the shutdown—on or after November 13, 2025—are subject to normal procedures.

(6) Regular Loan Servicing Deadlines

Everyday FSA servicing of a loan is called regular, or routine, servicing.⁴⁵

Any filing deadlines for regular servicing are paused for the shutdown.⁴⁶ If a farmer did not respond to a deadline during the shutdown, FSA will send the farmer a letter explaining that the farmer has forty-three calendar days from that letter to respond.

IV. FSA Farm Programs

The following sections discuss a number of FSA Farm Programs and how they were affected by the shutdown.

A. FSA Farm Program Deadlines—Generally Extended to December 15, 2025

Many farmers participate in FSA farm programs and have deadlines that took place during the shutdown.

In general, according to FSA, deadlines that “occurred during” the shutdown will be extended by thirty calendar days.⁴⁷ The new deadlines would be December 15, 2025.⁴⁸

⁴⁴ FSA, Resuming FLP Activities, Notice FLP-976, para. 3E, page 4 (November 13, 2025).

⁴⁵ FSA Handbook, 4-FLP, Regular Direct Loan Serving (September 5, 2025) describes these forms of servicing. See https://www.fsa.usda.gov/Internet/FSA_File/4-flp_roo_a47.pdf.

⁴⁶ FSA, Resuming FLP Activities, Notice FLP-976, para. 3G, page 5 (November 13, 2025).

⁴⁷ FSA Notice CM-874, Deadline Extension Policy for Multiple FSA Farm Programs Due to Temporary Closure Resulting from Lapse in Federal Funding (“Deadline Extension Policy”), para. 1A, page 1 (November 19, 2025), at https://www.fsa.usda.gov/Internet/FSA_Notice/cm_874.pdf. The deadline is extended thirty days from November 13, 2025. Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), the new FSA deadline is now December 15, 2025.

An earlier Notice that was issued the day before, FSA Notice CM-873, is somewhat different from the current policy, was made obsolete by the Notice of November 19, 2025. FSA Notice CM-874, Deadline Extension Policy (November 19, 2025).

⁴⁸ The deadline is extended thirty days from November 13, 2025. Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), the new FSA deadline is now December 15, 2025.

An earlier Notice that was issued the day before, FSA Notice CM-873, is somewhat different from the current policy, was made obsolete by the Notice of November 19, 2025. FSA Notice CM-874, Deadline Extension Policy (November 19, 2025).

FSA's Notice on the thirty-day extension to December 15, 2025, appears to apply to a wide variety of FSA Farm Programs.⁴⁹ It likely does not apply to FSA Farm Loan Programs, and it does not apply to NRCS or other USDA agencies.

B. FSA Register Policy

Standard register policy applies to all extended program deadlines unless specific program policy states otherwise.⁵⁰ Appointments for producers who were already on the register during the shutdown can be rescheduled for up to three weeks, beginning the day the government reopened.

C. FSA Appeals or Requests for Reconsideration—Different From NAD

In general, farmers have thirty days from the receipt of an FSA adverse decision to file a request for reconsideration or appeal through FSA.⁵¹ Note that this is separate from, and different from, appeals within the National Appeals Division (NAD).

If the deadline for a farmer to file a request for reconsideration or an FSA appeal was during the shutdown—between October 1, 2025 and November 13, 2025—the deadline may change for the farmer.⁵² The request will be counted as timely filed if submitted to FSA by the later of either: (1) thirty calendar days after the day the farmer received the adverse decision; or (2) within thirty calendar days, beginning from the day the government reopened. Based on this rule, it appears the second of these dates would be December 15, 2025.⁵³

D. FSA Program Deadline Changes

The following sections describe deadline changes for several FSA programs or policies. They are:

- (1) Emergency Conservation Program (ECP);
- (2) Noninsured Crop Disaster Assistance Program (NAP);
- (3) Farm Storage Facility Loan (FSFL) Program;
- (4) Emergency Livestock Relief Program (ELRP);

⁴⁹ FSA Notice CM-874, Deadline Extension Policy, para. 2A, pages 2-8 (November 19, 2025).

⁵⁰ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 2 (November 19, 2025). This seems to concern sign-up for appointments at local offices. According to FSA: "Registers are not an extension of a program signup deadline. Rather, they are a means by which customers can be determined to have met the program signup deadline by contacting FSA to indicate their intention of applying by the deadline. The customer, whose name is on the register, may represent their self, an operation(s) they have a share in, or any person or operation(s) they have signature authority for at the appoint." FSA Handbook, 1-CM, Common Management and Operating Provisions, para. 2F, page 1-4.5 (September 9, 2024).

⁵¹ Appeals and requests for reconsideration made directly to FSA, as opposed to NAD, can be found in FSA Handbook, 1-APP, Program Appeals, Mediation, and Litigation, paras. 13A to 14D, pages 2-10 to 2-13 (July 18, 2025).

⁵² FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 3 (November 19, 2025).

⁵³ The deadline is extended thirty calendar days from November 13, 2025. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 3 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), the new FSA deadline for farmer actions is December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).

- (5) Emergency Forest Restoration Program (EFRP);
- (6) Dairy Margin Coverage Program (DMC);
- (7) Loan Deficiency Payments (LDP) and Marketing Assistance Loans (MAL);
- (8) Reimbursement Transportation Cost Program (RTCP); and
- (9) Tree Assistance Program (TAP).

(1) Emergency Conservation Program (ECP) Reporting

The Emergency Conservation Program (ECP) requires farmers to make reports to FSA on their performance under ECP agreements.⁵⁴ In general, these reports must be made on or before the “expiration date” for the program.⁵⁵ It is also the case that FSA can grant an extension for that performance date. This extension is possible under normal FSA rules and is not part of the FSA response to the shutdown.

Due to the shutdown, if the deadline for a farmer to report on a performance that was part of an ECP agreement was during the shutdown (between October 1, 2025, and what appears to be November 12 or 13, 2025) the reporting deadline may change for the farmer.⁵⁶ The report will be counted as timely filed if submitted to FSA by the later of two dates: (1) thirty calendar days after the day the farmer received the adverse decision; or (2) December 15, 2025.⁵⁷

(2) Noninsured Crop Disaster Assistance Program (NAP)

The Noninsured Crop Disaster Program (NAP) provides assistance to farmers of crops that cannot be insured by federal crop insurance. It is intended to help protect farmers against natural disasters that prevent planting, lower yields or produce crop losses.⁵⁸ It is a complicated program that is important to many diversified and smaller-scale farmers.

Several aspects of NAP coverage were affected by the shutdown. This Guide describes five of them: (1) application for coverage; (2) seventy-two-hour loss notification; (3)

⁵⁴ The Emergency Conservation Program (ECP) is described in FSA, Conservation: Emergency Conservation Program (ECP) Fact Sheet (January 2024), at <https://www.fsa.usda.gov/tools/informational/fact-sheets/emergency-conservation-program-ecp>, and in FSA, Emergency Conservation Program, at <https://www.fsa.usda.gov/resources/programs/emergency-conservation-program-ecp>.

⁵⁵ FSA Handbook, 1-ECP, Emergency Conservation Program—Beginning October 1, 2023, para. 429A, page 8-85 (November 21, 2024), available at https://www.fsa.usda.gov/Internet/FSA_File/1-ecp_ro8_a01.pdf.

⁵⁶ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 3, (November 19, 2025). Notice says: “between October 1, 2025, and the date the government reopens.”

⁵⁷ The deadline is extended to thirty calendar days from November 13, 2025, the day the government opened. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 5 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), USDA says the new FSA deadline for farmer actions is now December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).

⁵⁸ For a basic summary see, FSA, Disaster Assistance: Noninsured Crop Disaster Assistance Program Fact Sheet (August 2025), at <https://www.fsa.usda.gov/tools/informational/fact-sheets/noninsured-crop-disaster-assistance-program-nap>; FSA, Noninsured Crop Disaster Assistance Program (2025), at <https://www.fsa.usda.gov/resources/programs/noninsured-disaster-assistance-program-nap>.

seventy-two-hour post-harvest notification; (4) application for payment; and (5) notice of loss.

(a) Application for NAP Coverage

In general, an application for NAP coverage must be filed by the farmer by what is called the “closing date” for the crop.⁵⁹ The application is extensive and can be complicated.

In general, if the closing date for a crop was during the shutdown, the application due date is now December 15, 2025.⁶⁰

FSA NAP rules already allow for late-filed applications.⁶¹ FSA rules also say that coverage for a crop cannot begin until one day after the application is submitted.

(b) Seventy-Two-Hour Loss Notification

Under FSA NAP rules, farmers of some crops must notify FSA of damage or loss within seventy-two hours of the time the damage or loss first is apparent. To notify FSA farmers must submit what is called Form CCC-576—the notice of loss form for NAP.⁶² Eligible damage and loss includes if the crop is hand-harvested or deteriorates rapidly.⁶³

Due to the shutdown, if the notice of loss would have been due during the shutdown, the farmer now has thirty calendar days from November 13, 2025, which would be December 15, 2025.⁶⁴

(c) Seventy-Two-Hour Post-Harvest Notification

In general, if a farmer filed a seventy-two-hour loss notification (Form CCC-576), the farmer must, during that same year, file another notice within seventy-two hours of the completion of the harvest.⁶⁵ The rule applies for hand-harvested or rapidly deteriorating crops. It must be filed before the crop is destroyed so that an appraisal of the remaining production may be done by FSA. The appraisal is intended to document any marketable production left in the field. According to

⁵⁹ FSA Notice CM-874, Deadline of Extension Policy, page 5, para. 2.A (November 19, 2025). Applications are discussed in FSA Handbook, 1-NAP (Revision 2), Noninsured Crpp Disaster Assistance Program for 2015 and Subsequent Years, para. 301, pages 5-4 to 5-12 (June 11, 2025).

⁶⁰ The deadline is now 30 days from the day the government reopened. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 5 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), USDA says the new deadline is December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).

⁶¹ FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, paras. 301.E, 576, pages 5-8.5, and 8-7 to 8-8 (June 11, 2025).

⁶² FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 576, pages 8.7 to 8.8 (June 11, 2025).

⁶³ FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 576A-B, page 8.7 (June 11, 2025).

⁶⁴ The application date is changed to thirty days after the government reopens. FSA Notice CM-874, Deadline of Extension Policy, para 2A, page 5 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), the new FSA deadline for farmer actions is December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).

⁶⁵ FSA Notice CM-874, Deadline Extension Policy, para. 2A, page 7 (November 19, 2025); FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 576, page 8-7 (June 11, 2025).

FSA rules, FSA can waive the post-harvest reporting requirement for mechanically-harvested crops even if the crop is considered a rapidly deteriorating crop.⁶⁶ This waiver does not apply to crops in a tropical region.

Due to the shutdown, if the seventy-two-hour post-harvest notice was during the shutdown, that loss notification must be submitted and filed with FSA by December 15, 2025.⁶⁷

In addition, if an inspection was required during the shutdown, it appears that FSA can waive the seventy-two-hour post-harvest notice requirement for any hand-harvested or rapidly deteriorating crop.⁶⁸

(d) NAP Application for Payment

Farmers must file an application for payment with FSA to apply for NAP payments.⁶⁹ In general, this must be done within sixty days of the last day of coverage for the crop year for any covered crop in what FSA calls the “unit.”⁷⁰ This deadline is different if the farmer produced forage that was intended for grazing.⁷¹

If the application for payment was due during the shutdown, the application must be filed by December 15, 2025.⁷²

(e) NAP Notice of Loss

FSA NAP rules set deadlines for submitting a notice of loss for different types of NAP claims.⁷³ A notice of loss means that Part B of Form CCC-576 must be completed. The normal rules and rules following the shutdown are described below.

i. Normal Rules

The following sections describe the normal rules for submitting NAP notices of loss.

⁶⁶ FSA Notice CM-874, Deadline Extension Policy, para. 2A, page 7 (November 19, 2025); FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 576B, page 8-7 (June 11, 2025).

⁶⁷ The application date is changed to thirty days after the government reopens. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 7 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), new FSA deadline is December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).

⁶⁸ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 7 (November 19, 2025).

⁶⁹ FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 675.A, page 10-1 (June 11, 2025); FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 7 (November 19, 2025).

⁷⁰ For a definition of a “unit” for purposes of NAP, see FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, Exhibit 2, page 23, “Unit” (June 11, 2025).

⁷¹ FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 675A, page 10-1 (June 11, 2025); FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 7 (November 19, 2025).

⁷² The application date is changed to thirty days after the government reopens. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 7 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), USDA says the new FSA deadline is December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, paras. 1A, 2A, pages 1, 7 (November 19, 2025).

⁷³ FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 575B, page 8-1 (June 11, 2025).

a. Prevented Planting

Prevented planting claims must be made within fifteen calendar days of the final NAP planting date.⁷⁴

b. Low Yield Claims

Low yield claims and what FSA calls “allowable value loss” can have one of two deadlines for a notice of loss.

The deadline is the earlier of two dates.⁷⁵ The first date is fifteen calendar days after the occurrence of the disaster or the date of loss, or after damage to the commodity first become apparent. The second is fifteen calendar days after the normal harvest date.

c. Forage Different Rules

For farmers of forage, when the intended use of the forage is grazing, there are different rules for filing a notice of loss.⁷⁶

ii. Shutdown Rules

If the notice of loss was due for NAP during the shutdown, the notice of loss must be filed by December 15, 2025.⁷⁷

(3) Farm Storage Facility Loan (FSFL) Program

FSA's Farm Storage Facility Loan (FSFL) program provides loans for a broad range of storage, handling, and transportation facilities for farm production.⁷⁸ Several different deadlines that apply to FSFL borrowers could have fallen during the shutdown. FSFL loans, it should be noted, are not a part of FSA's Farm Loan Programs and therefore have quite different rules from FSA Operating (OL), Farm Ownership (FO), and other loans.

⁷⁴ FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 575B, page 8-1 (June 11, 2025); FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025).

⁷⁵ FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, para. 575B, page 8-1 (June 11, 2025); FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025).

⁷⁶ See FSA Handbook, 1-NAP, Noninsured Crop Disaster Assistance, paras. 575A-B, 675A, pages 8-1 to 8-2, and 10-1 (June 11, 2025).

⁷⁷ The application date is changed to thirty days after the government reopens. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), USDA says the new deadline is now December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, paras. 1A, 2A, pages 1, 8 (November 19, 2025).

⁷⁸ For a summary of FSA's FSFL program, see FSA, Farm Storage Facility Loan Program (December 2024), at <https://www.fsa.usda.gov/tools/informational/fact-sheets/farm-storage-facility-loans>; FSA, Farm Storage Facility Loan Program (2025) at <https://www.fsa.usda.gov/resources/programs/farm-storage-facility-loan-fsfl-program>

For a somewhat dated FLAG view see FLAG, Farmers' Guide to the Farm Storage Facility Loan Program (June 2019), at <http://www.flaginc.org/wp-content/uploads/2019/06/Farmers%E2%80%99-Guide-to-the-Farm-Storage-Facility-Loan-Program-June-2019.pdf>.

(a) Farmer Installment Payments—Some Extensions to January 16, 2026

Farmers with FSFL loans generally make an installment payment once per year.⁷⁹ Some farmers will have had a payment due during the shutdown.

If a farmer's installment was due "through November 17, 2025," the farmer has until January 16, 2026, to make the payment.⁸⁰

(b) FSA Action—Date Recorded for FSFL Installment Payments

When a farmer makes a payment on an FSFL loan FSA calls this an installment payment.⁸¹ FSA should record the date of the FSFL installment payment by the farmer.⁸² This date is important to the farmer because it records whether FSA thinks the payment was on time and affects the interest charged to the farmer.⁸³

i. Normal Rule

Normally, FSA records the farmer's FSFL installment payment as the date it was received.⁸⁴

ii. Shutdown Rules

Due to the shutdown, different rules will apply to how FSFL installment payments are recorded.⁸⁵

a. Payment Received Before October 1, 2025

If the payment was received before October 1, 2025, FSA should record the payment date as the date it was received.⁸⁶

⁷⁹ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 3 (November 19, 2025). See, as well, FSA Handbook, 1-FSFL (revision 3), Farm Storage Facility Loan Program, para. 211, pages 12-5 to 12-7 (December 10, 2024), at https://www.fsa.usda.gov/Internet/FSA_File/1-fsfl_ro3_a06.pdf.

⁸⁰ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 3 (November 19, 2025). The Notice seems to suggest that payments due before the shutdown started, on October 1, 2025, are now due on January 16, 2026.

⁸¹ For FSA rules about installment payments, see FSA Handbook, 1-FSFL, Farm Storage Facility Loan Program, para. 211, pages 12-5 to 12-7 (December 10, 2024).

⁸² FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 4 (November 19, 2025); FSA Handbook, 1-FSFL, Farm Storage Facility Loan Program, para. 211.C, page 12-5 (December 10, 2024).

⁸³ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 4 (November 19, 2025). Normal FSFL program rules state that there is no grace period for a late FSFL annual installment payment. See FSA Handbook, 1-FSFL, Farm Storage Facility Loan Program, para. 211.A, page 12-5 (December 10, 2024).

⁸⁴ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 4 (November 19, 2025); FSA Handbook, 1-FSFL, Farm Storage Facility Loan Program, para. 211.C, page 12-5 (December 10, 2024).

⁸⁵ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 4 (November 19, 2025).

⁸⁶ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 4 (November 19, 2025).

b. *Payment Received From October 1, 2025, Through October 22, 2025*

If the payment was received from October 1, 2025, through October 22, 2025, different rules apply.⁸⁷ If it was sent through the United States Postal Service, the postmark date is used as the redemption date. For redemptions received by FSA at a local Service Center, which could be in person or at a drop-off box, the installment payment date is the date the payment was received or dropped off at the local Service Center. For payments received after October 22, 2025, the date the payment was received by the local office is used as the installment date.

(c) FSA Internal Tasks—Servicing Forms

According to FSA rules, FSA should start Form CCC-195 servicing—the FSFL Processing Checklist—forty-five days before the FSFL annual installment due date.⁸⁸

Due to the shutdown, FSA must complete the servicing form by January 16, 2025.⁸⁹

(d) Farmer Request for Deferment of Payment

Farmers with FSFL loans have the right to ask for a 120-day deferment, or delay, on a loan payment.⁹⁰ FSA rules allow a deferment of up to one year if the farmer experiences financial hardship.⁹¹

In general, the request for a deferment must be within 60 days before or after the payment due date.⁹²

As a result of the shutdown, farmers that are now delinquent on an FSFL loan have until January 18, 2026, and perhaps as late as January 20, 2026, to request a deferment on a payment.⁹³ January 18, 2026, is a Sunday and January 19, 2026, is a holiday.

⁸⁷ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 4 (November 19, 2025).

⁸⁸ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 3 (November 19, 2025); FSA Handbook, 1-FSFL (revision 3), para. 210A, page 12-2 (December 10, 2024).

⁸⁹ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 3 (November 19, 2025).

⁹⁰ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025); FSA Handbook, 1-FSFL, para. 211.E, pages 12-5 to 12-7 (December 10, 2024).

⁹¹ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025); FSA Handbook, 1-FSFL, para. 247, pages 12-89 to 12-104 (December 10, 2024).

⁹² FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025); FSA Handbook 1-FSFL, Farm Storage Facility Loan Program, para. 247.C, page 12-89 (December 10, 2024).

The FSA Handbook, however, says: “CCC-777 and a current balance sheet must only be accepted when an upcoming next installment due date is within 60 calendar days or less.” In other words, it appears it cannot be submitted after the installment date. FSFL Handbook, 1-FSFL, para. 247.C, page 12-90 (December 10, 2024).

⁹³ The FSA Notice says that farmers have sixty calendar days from the date of the FSA Notice to request deferment. The Notice was released November 19, 2025, so the request appears to be due January 18, 2026. However, January 18, 2026, is a Sunday, and January 19, 2026 is a holiday. So it is possible the

(e) If Loan Payment is Late—FSA Inspection Delayed

If a full loan payment on an FSFL is late, according to FSA rules, FSA should conduct an inspection if the FSFL annual installment is not paid in full within thirty calendar days of its due date.⁹⁴

As a result of the shutdown, FSA must conduct the inspection if payment is not made by January 16, 2026.⁹⁵

(f) Offsets if Farmer Does Not Make Payment

If a farmer does not make a loan payment on an FSFL loan, FSA will take several actions.⁹⁶ If the payment is not made within 120 calendar days one of these actions is that FSA will transfer the loan to the Treasury Offset Program (TOP).⁹⁷ TOP will take actions to collect money from the farmer by using an offset.⁹⁸

As a result of the shutdown, FSA will refer the loan to TOP for offset if two things are true: (1) the loan payment has not been made by March 17, 2026; and (2) the farmer has not requested a deferment of the payment.⁹⁹

(4) Emergency Livestock Relief Program (ELRP) Application Deadline

The deadline to apply for the Emergency Livestock Relief Program (ELRP) for 2023 and 2024 was October 31, 2025. Two forms of ELRP are available.¹⁰⁰ One is for flood and wildfire. A second is for drought and wildfire.

Due to the shutdown, the application deadlines have changed, and the deadlines vary a bit within the program.¹⁰¹

The ELRP application deadline for 2023 and 2024 for flood and wildfire was October 31, 2025.¹⁰² Due to the shutdown, the deadline was extended to November 21, 2025.¹⁰³ For flood and wildfire ELRP this change was announced by press release.

deadline could be as late as January 20, 2025. See FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025). Farmers should contact FSA to be certain.

⁹⁴ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025); FSA Handbook 1-FSFL, Farm Storage Facility Loan Program, para. 215.A, pages 12-12 to 12-13 (December 10, 2024).

⁹⁵ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025).

⁹⁶ For details on the type of actions FSA can take when an FSFL loan becomes delinquent, see FSA Handbook 1-FSFL, Farm Storage Facility Loan Program, Part 13 (December 10, 2024).

⁹⁷ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025); FSA Handbook 1-FSFL, Farm Storage Facility Loan Program, para. 262.B, page 13-2 (December 10, 2024).

⁹⁸ Referral to TOP is described in 7 C.F.R. §§ 3.30 to 3.34 (2025). TOP is described at Department of Treasury, Treasury Offset Program (2025), at <https://fiscal.treasury.gov/top/>.

⁹⁹ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 4 (November 19, 2025).

¹⁰⁰ FSA, Emergency Livestock Relief Program (2025), at <https://www.fsa.usda.gov/resources/programs/emergency-livestock-relief-program-elp>.

¹⁰¹ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025).

¹⁰² FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025).

¹⁰³ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025). The deadline extension is also included on the FSA website – but only for the flood and wildlife version of ELRP.

The ELRP application deadline for 2023 and 2024 for drought and wildfire was October 31, 2025.¹⁰⁴ Due to the shutdown, the deadline was extended to November 21, 2025.¹⁰⁵ Unlike with ELRP for flood and wildfire, this extension does not appear to have been announced in a press release. It can be found only in an FSA Notice released on November 19, 2025. FSA also says that FSA staff “will address” pending 2023 or 2024 Livestock Forage Disaster Program (LFP) relief cases, to the extent they are applicable for ELRP eligibility.¹⁰⁶

(5) Emergency Forest Restoration Program (EFRP) Reporting

The Emergency Forest Restoration Program (EFRP) requires farmers to make reports to FSA on their performance under EFRP agreements.¹⁰⁷ In general, these reports must be made by the expiration date in the EFRP agreement. It is also possible that this date can be extended by FSA.¹⁰⁸ An extension is possible under normal FSA rules and is not a part of the FSA response to the shutdown.

Due to the shutdown, if the deadline for a farmer to report on a performance that was part of an EFRP agreement was during the shutdown—between October 1, 2025, and November 13, 2025—the reporting deadline may change for the farmer.¹⁰⁹ The report will be counted as timely-filed if submitted to FSA by the later of two dates: (1) the date granted by FSA; or (2) December 15, 2025.¹¹⁰

(6) Dairy Margin Coverage Program (DMC) Premiums

Premiums for FSA’s Dairy Margin Coverage Program (DMC) were due on September 1, 2025.¹¹¹

¹⁰⁴ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025).

¹⁰⁵ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025).

¹⁰⁶ One of the eligibility requirements for ELRP is that the farmer has an approved application for LFP. See FSA, Emergency Livestock Relief Program (2025), at <https://www.fsa.usda.gov/resources/programs/emergency-livestock-relief-program-elp#drought-wildfire>.

¹⁰⁷ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025); FSA Handbook 1-EFRP (Revision 1), Emergency Forest Restoration Program, para. 142.B, page 7-41 (July 27, 2023). The reports must include a complete FSA-848B Form and include supporting data. EFRP is described in FSA, Emergency Forest Restoration Program (EFRP) Fact Sheet (2025), at <https://www.fsa.usda.gov/tools/informational/fact-sheets/emergency-forest-restoration-program-efrp>.

¹⁰⁸ FSA, Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025); FSA Handbook 1-EFRP (Revision 1), Emergency Forest Restoration Program, para. 143.A, page 7-42 (July 27, 2023).

¹⁰⁹ FSA Notice CM-874, Deadline Extension Policy, para. 2A, page 3 (November 19, 2025).

¹¹⁰ The deadline is changed to thirty calendar days after the government reopens. FSA Notice CM-874, Deadline of Extension Policy, section 2A, page 8 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), the new deadline is now December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).

¹¹¹ FSA Notice CM-874, Deadline Extension Policy, para. 2A, page 2 (November 19, 2025). The Dairy Margin Coverage Program is described in FSA, Dairy Margin Coverage Program (DMC) Fact Sheet (January 2025), at <https://www.fsa.usda.gov/tools/informational/fact-sheets/dairy-margin-coverage-dmc>; FSA, Dairy Margin coverage Program (2025), at , <https://www.fsa.usda.gov/resources/programs/dairy-margin-coverage-program-dmc..>

Due to the shutdown, FSA will waive the accrued DMC interest for 2025 premiums and receivables not paid during the shutdown.¹¹²

(7) Loan Deficiency Payments (LDP) and Marketing Assistance Loans (MAL)

Loan Deficiency Payments (LDP) and Marketing Assistance Loans (MAL) provide farm income support with direct payments to farmers. The programs are complicated.¹¹³

The shutdown affected these complicated and widely used programs in various ways.¹¹⁴ For example, farmers may have moved loan collateral, loans may be matured, and loan repayment dates may have passed.

Farmers using the programs should contact USDA about next steps.

(8) Reimbursement Transportation Cost Program (RTCP)

The Reimbursement Transportation Cost Payment Program (RTCP) reimburses geographically disadvantaged farmers for part of the cost to transport agricultural commodities or farm inputs.¹¹⁵

Previously, the deadline for farmers to submit documentation for RTCP was November 3, 2025.¹¹⁶ Because of the shutdown, the deadline for farmers to submit documentation is December 15, 2025.¹¹⁷

(9) Tree Assistance Program (TAP)

The Tree Assistance Program (TAP) provides assistance to farmers to replant or rehabilitate orchards and nurseries that were affected by natural disaster.¹¹⁸

¹¹² FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 2 (November 19, 2025).

¹¹³ For a short summary of the programs see USDA, Marketing Assistance Loans and Loan Deficiency Payments (September 2020), at <https://www.fsa.usda.gov/tools/informational/fact-sheets/marketing-assistance-loans-loan-deficiency-payments>. For a more detailed sense of the programs see FSA Handbook 8-LP (Revision 3), Marketing Assistance Loans and Loan Deficiency Payments for 2019 and Subsequent Crop Years (May 17, 2023), at https://www.fsa.usda.gov/Internet/FSA_File/8-lp_ro3_a01.pdf.

¹¹⁴ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 4s 4, 8 (there are two different page 4s.) (November 19, 2025).

¹¹⁵ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025). For a description of the program see FSA, Reimbursement Transportation Cost Payment Program (RTCP) for Geographically Disadvantaged Farmers and Livestock Producers (July 2025), at <https://www.fsa.usda.gov/tools/informational/fact-sheets/reimbursement-transportation-cost-payment-program-rtcp-6>.

¹¹⁶ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025); FSA Handbook, Reimbursement Transportation Cost Payment Program for Geographically Disadvantaged farmers and Ranchers, 2-SP, part 5, pages 4-5 to 4-6 (December 6, 2022), at https://www.fsa.usda.gov/Internet/FSA_File/2-sp_roo_a15.pdf.

¹¹⁷ The deadline is changed to thirty calendar days after the government reopens. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), the new deadline is December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).

¹¹⁸ The program is described in FSA, Tree Assistance Program Fact Sheet (October 2019), at https://www.fsa.usda.gov/sites/default/files/documents/tree_assistance_program-tap-

Under TAP, farmers with eligible tree, bush, and vine losses must apply to FSA and give supporting documentation to FSA within ninety calendar days of each disaster event, or when the loss of tree, bush, or vines is apparent to the farmers.¹¹⁹

If the TAP Application for Assistance, Form CCC-899, would have been due during the shutdown, farmers have until December 15, 2025, to submit and file the form.¹²⁰

V. Conclusion

The government shutdown, which began on October 1, 2025, and ended on November 12, 2025, has affected many FSA farm loan and FSA farm programs. This Guide was written to help explain those new deadlines and rules, at least as they existed as of December 3, 2025.

Some of the new deadlines are fast-approaching and farmers should act quickly to review their new obligations. If farmers are unsure about a new deadline, they should contact FSA to get clarification.

Because we are still in the first month following the reopening of the government on November 13, 2025, much about how USDA will deal with the shutdown is still unknown. As more information becomes available, FLAG plans to update this Guide.

[fact sheet.pdf](#); FSA, Tree Assistance Program (2025), at <https://www.fsa.usda.gov/resources/programs/tree-assistance-program-tap>.

¹¹⁹ FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025); FSA Handbook, Tree Assistance Program (1-TAP Revision 4), para. 61, page 3-1 to 3.66 (May 27, 2025), at https://www.fsa.usda.gov/Internet/FSA_File/1-tap_r04_a21.pdf.

¹²⁰ The deadline is changed to thirty calendar days after the government reopens. FSA Notice CM-874, Deadline of Extension Policy, para. 2A, page 8 (November 19, 2025). Because thirty days from November 13, 2025, is a Saturday (December 13, 2025), the new deadline is December 15, 2025. FSA Notice CM-874, Deadline Extension Policy, para. 1A, page 1 (November 19, 2025).