NRCS Cover Crop Termination Guidelines Version 4: June 2019

Cover Crops and Crop Insurance Overview – What you need to know as a producer:

Prior to the passage of the 2018 Farm Bill, the NRCS Cover Crop Termination Guidelines (Guidelines) had to be followed, or a deviation had to be approved in advance, for insurance to attach to a crop planted in a management system that included cover crops. However, cover crop adoption and regional availability of data on successful cover crop management have expanded significantly since the last Guidelines revision in 2014. For crops planted in the 2020 crop year and later, insurance will now attach at time of planting the insured crop and cover crop management practices will be reviewed under Risk Management Agency (RMA) rules for Good Farming Practice (GFP) determinations similar to other management decisions (e.g. fertilizer application, seeding rates, etc.)

Insurance attaches at planting as per the changes in the 2018 Farm Bill. In the event of a claim that is questioned by an Approved Insurance Provider (AIP) on the grounds of cover crop management, the AIP will complete research to adhere to procedure in order to make an initial GFP decision. For additional details regarding good farming practice determinations please see the RMA Good Farming Practice Handbook.

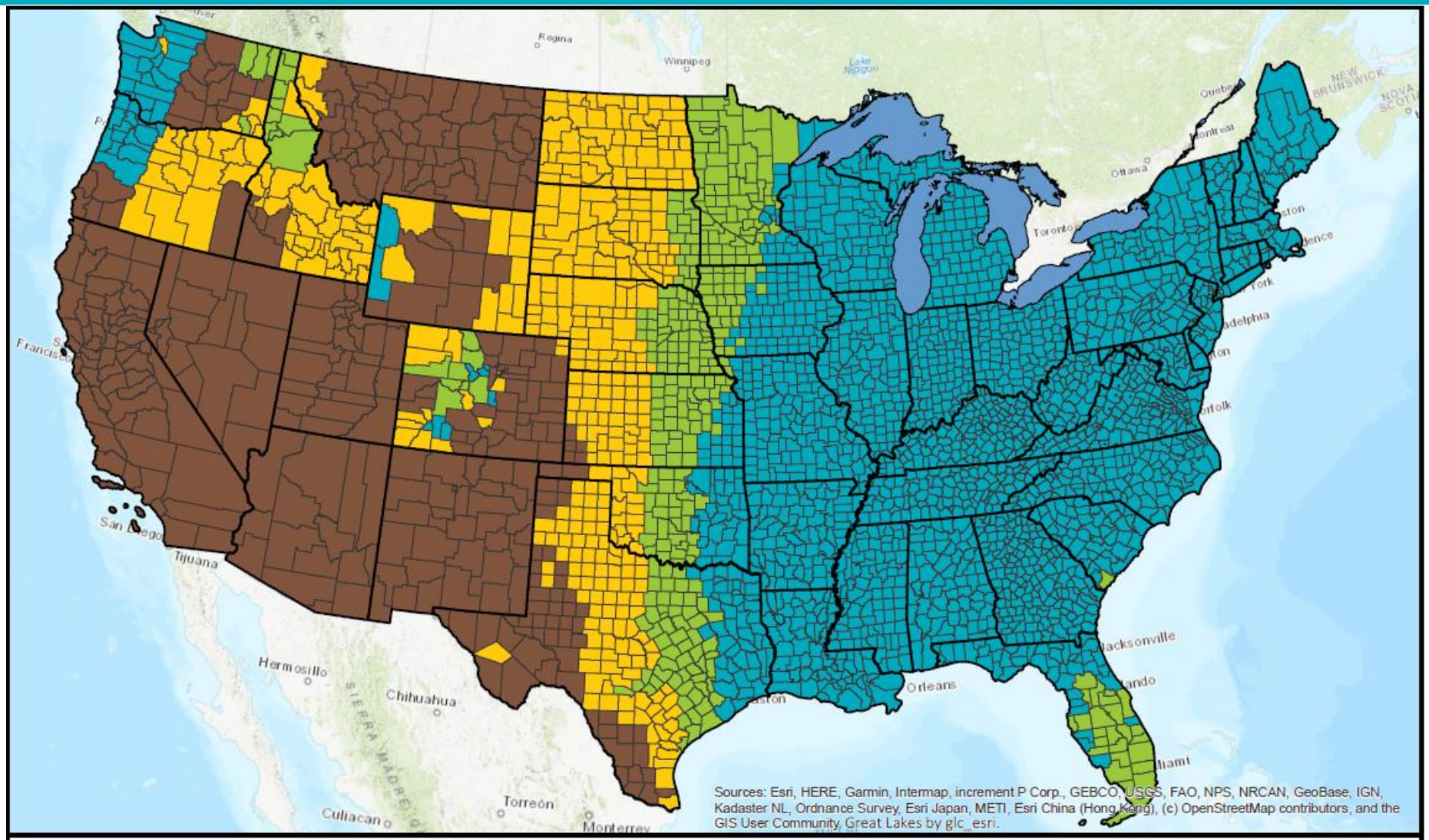
These Guidelines[1] are not intended as a substitute for best locally adaptive management for cover crop termination timing that optimizes water use efficiency, erosion control, soil health improvement, weed and pest control, allelopathy, habitat for beneficial organisms, nutrient cycling, and water quality improvement. The Guidelines provide a pre-approved latest end date for termination from a water availability standpoint for USDA programs. The Guidelines only apply to non-irrigated cropland, including systems that contain a fallow period. Cover crops in an irrigated cropping system should be terminated based on the crop system, water availability, and the conservation purpose, but before the planted crop emerges.

BACKGROUND

To ensure that USDA policies are coordinated and up to date with evolving cover crop practices, the Chief of the Natural Resources Conservation Service (NRCS), and the administrators of RMA and Farm Service Agency (FSA) organized an interagency workgroup to develop consistent, simple and flexible policy across the three agencies. National and local experts, along with multiple stakeholders, were involved in the process. Research literature, plant growth, soil hydrology models, and input from national/local experts in cover crop management provided the basis for the Guidelines to achieve their conservation benefits while minimizing risk of reducing yield to the following crop due to soil water use. These Guidelines are applicable to all USDA programs. The agencies welcome stakeholders to provide literature and data for use in improving these Guidelines over time. To share literature and data, stakeholders may contact their local NRCS office.

1 The purpose of these Guidelines is to provide an additional level of comfort for producers that may be unfamiliar with cover crops and want up front assurance that their crop is insured and their cover cropping management decisions will be considered a GFP. These Guidelines serve as a recognized nationally applicable agricultural expert resource for cover crop termination in cover cropping management systems. However, producers may also be implementing innovative cover cropping systems that fall outside these Guidelines. To help maximize additional flexibility and up - front assurance, producers can choose to pursue any one of the following options to assure that their cover cropping management system is a GFP.

1. A producer can follow the generalized zonal guidance provided in these Guidelines,
2. A producer can utilize already available published materials from agricultural experts (e.g., from a university) that are applicable for the crop and the area that support the cover crop management practice as a GFP determination (per the GFP Handbook
3. In rare instance where 1 and 2 do not cover a specific cover cropping management system, request an exception to these Guidelines by receiving agricultural expert support in writing in accordance with the GFP Handbook.



- Zone 1 - Terminated Cover Crop 35 Days or Earlier Before Planting, except for RMA Summerfallow Practice.
- Zone 2 - Terminated Cover Crop 15 Days or Earlier Before Planting, except for RMA Summerfallow Practice.
- Zone 3 - Terminated Cover Crop at or Before Planting, except for RMA Summerfallow Practice.
- Zone 4 - Terminated Cover Crop Before Crop Emergence.

Map Legend

Zone 1 – See Map	Zone 2 – See Map	Zone 3 – See Map	Zone 4 – See Map
For Late Spring to Fall Seeded Crops – Terminate cover crops 35 days or earlier prior to planting the crop. Early Spring Seeded Crops – Terminate cover crops as soon as practical prior to planting the crop. (Additional Zone Guidance #2 and Definition #12.)	For Late Spring to Fall Seeded Crops – Terminate cover crops 15 days or earlier prior to planting the crop. Early Spring Seeded Crops – Terminate cover crops as soon as practical prior to planting the crop. (Additional Zone Guidance #2 and Definition #12.)	Terminate cover crop at or before planting the crop	Terminate cover crop before crop emergence.
RMA Designated Summerfallow Practice (See Definition #13 for additional guidance)	RMA Designated Summerfallow Practice See Definition #13 for additional guidance)	RMA Designated Summerfallow Practice See Definition #13 for additional guidance)	

Additional Zone Guidance

1. If the cover crop is part of a no-till system, termination may be delayed up to 7 days from the zone-based termination deadline.
2. Fall seeded cover crops will have limited growth in the spring prior to "early" spring seeded crops, seeded prior to March 20, (e.g., spring wheat, sugar beets, corn), and therefore the cover crop may be terminated as late as at crop planting.
3. When earlier than normal planting occurs due to favorable weather or soil conditions, cover crop termination will naturally occur closer to planting. For example, if planting occurs 15 days earlier than normal, the cover crop termination period may be 15 days closer to planting (or at planting in zone 2).
4. If the season is drier than normal nearing cover crop termination time, consider an earlier termination to conserve soil moisture.
5. If the spring season is wetter than normal at cover crop termination time, consider a later termination to use excess soil moisture, increase infiltration of additional rain, and improve soil health and seedbed condition. For example, in zone 2, if the field is too wet to terminate a cover crop 15 days before planting, the cover crop may be terminated closer to planting.
6. Seasonal cover species used as herbaceous wind barriers or nurse crops (short season cover crops) that protect the insured crop as it establishes (see definitions) are not considered cover crops and do not impede insurability. The seasonal covers used for the purpose of early crop establishment must be appropriate species for the area and the planned purpose.

Definitions

1. **Cover Crop** – Crops including grasses, legumes and forbs for seasonal cover and other conservation purposes. Cover crops are primarily used for erosion control, soil health improvement, weed and other pest control, habitat for beneficial organisms, improved water efficiency, nutrient cycling, and water quality improvement. A cover crop managed and terminated according to these Guidelines is not considered a "crop" for crop insurance purposes. The cover crop may be terminated by natural causes such as frost, or intentionally terminated through management such as chemical application, crimping, rolling, tillage, grazing, or cutting.
2. **Cover Crop Termination** – Means a practice that historically and under reasonable circumstances results in the termination of the growth of a cover crop.
3. **Good Farming Practice** – RMAterm - The production methods utilized to produce the insured crop and allow it to make normal progress toward maturity and produce at least the yield used to determine the production guarantee or amount of insurance, including any adjustments for late planted acreage, which are those generally recognized by agricultural experts or organic agricultural experts, depending on the practice, for the area.
4. **Continuous Cropping** – RMA Term – Any non-irrigated production practice that does not qualify as a summerfallow practice.
5. **Over-Seeding/Interseeding** – Both terms can be defined as planting one or more cover crop species into an existing or established crop. Common uses that involve over-seeding or interseeding include: (1) over-seeding a grass and/or legume cover crop into an existing stand of small grain at an appropriate time for the cover and germination, or (2) seeding a cover crop into an existing crop (e.g., corn or soybeans) and in a way where cover crop and main crop planting permits separate agronomic maintenance or management at a time that will not impact the yield or harvest of the insured crop. This seeding method does not affect the insurability of the main crop. Insurance attaches at the time of planting the insured crop and overseeding/interseeding occurs after the insured crop is planted, so the crop is insurable. Overseeding/interseeding is a separate planting method from interplanting.
6. **Interplanting** – This involves multiple crop species grown together, with no distinct row pattern and does not permit separate agronomic maintenance or management. For RMA purposes, this means if a cover crop and insured crop are planted in a way that does not permit separate agronomic maintenance or management, then that crop is not insurable. This would also apply to cover crops if interplanted into the insured crop and the cover crop interfered with the agronomic management and harvest of the main crop.
7. **Relay Cropping** – The practice of interseeding a second crop into the first crop well before the first crop is harvested. The relay cropping strategy is used to enable production of a second crop in areas where time for seeding the second crop following harvest of the first is considered inadequate for double cropping. This is not considered a cover cropping practice, but a method of double cropping and may fall under the RMA 1st / 2nd crop rules.
8. **Double-Cropping** – RMA and NRCS term - Producing at least 2 crops for harvest from the same acreage in the same crop year. This does not include cover crops that have been managed and terminated according to these Guidelines.
9. **Early Spring-Seeded Crops** – Crops planted as early as possible after the spring thaw are considered early spring crops (e.g., spring wheat, spring barley, sugar beets, corn).
10. **Herbaceous Wind Barriers** – There are specific cropping situations when seasonal cover is needed to protect young seedlings from wind erosion abrasion. The typical seasonal covers may include such crops as wheat, rye, or oats that are planted in rows (e.g., 20 feet apart, single or double row of small grain). These seasonal covers fall under the NRCS CPS Herbaceous Wind Barriers (Code 603). These barriers are not considered cover crops.

Definitions

11. **Nurse crop (companion crop)** – A crop planted into the same acreage as another crop, that is intended to be harvested or terminated separately, and which is planted to improve growing conditions for the crop with which it is grown. Short season cover crops are nurse crops in specific cropping situations, where the producer will plant the intended crop, plus a short-term seasonal cover crop (NRCS CPS Cover Crop, (Code 340)) prior to or at the same time as planting the main or insured crop. In this case the seasonal cover emerges first and provides short term wind erosion protection until the main crop becomes established and provides its own protection from wind erosion. These seasonal cover crops are terminated by cultivation, frost /winterkill, or herbicides once the main crop is established. The seasonal covers used for the purpose of early crop establishment must be appropriate species for the area and the planned purpose and permit separate agronomic maintenance or management that will not impact the yield or harvest of the insured crop and in accordance with applicable crop provisions.

12. **Cover Crop Haying, Grazing, or Forage Harvest** – Cover crops may be hayed, grazed, or harvested as silage, unless prohibited by RMA crop insurance policy provisions. Cover crops cannot be harvested for grain or seed.

13. **RMA Summerfallow Practice** – If a cover crop is planted during the fallow year, the acreage may be insured under the summerfallow practice for the current crop year provided the cover crop was not hayed, grazed, or otherwise harvested, and terminated in accordance with the Guidelines but no later than June 1 preceding the insured crop. RMA summerfallow practice is an insurability requirement and cover crops planted on summerfallow acreage must be terminated in accordance with this definition. Producers should contact their local NRCS office for appropriate cover crops that can be grown in summerfallow regions. Examples of high water use cover crops are alfalfa, sugar beets, cereal rye, corn, mustard, radishes, and turnips.

    For the 2020 and succeeding crop years, if a cover crop was planted during the fallow year was hayed, grazed, or otherwise harvested, or not terminated by June 1, the acreage may be insured under the “continuous cropping practice” (if available in your county), or by written agreement (if continuous cropping is not available in your county).

References

NRCS Conservation Practice Standard (Code 603) – Herbaceous Wind Barriers -
https://www.nrcs.usda.gov/wps/PA_NRCSConsumption/download?cid=nrcseprd340685&ext=pdf
NRCS Conservation Practice Standard Cover Crop (Code 340) – Cover Crop -
https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1263176.pdf
RMA Good Farming Practice Handbook -
https://www.rma.usda.gov/en/Policy-and-Procedure/Program-Administration---14000
NRCS State FOTG for list of approved cover crop species -
https://efotg.sc.egov.usda.gov/#/details