

## Sense of the Board

It has come to the attention of the Board that it may have been inconsistent in the manner in which it determines whether the addition of a new commodity to an existing approved 508(h) submission is considered a new submission or an expansion. When approving the livestock products in the early to mid-2000's, the Board considered the addition of new livestock, such as fed cattle to the Livestock Risk Protection (LRP) plan, to be maintenance since it was done by the submitter of the original 508(h) LRP plan. However, the Board applied a different standard with respect to policies such as Actual Revenue History (ARH).

It is the Sense of the Board that its original decision that expansions of an existing 508(h) policy or plan to new locations or to a new commodity are maintenance, continues to ensure the needs of producers are met and reduces the administrative burdens on the Board, RMA and submitters. Therefore, the Board will consider an expansion of a 508(h) plan to cover an additional commodity, such as expanding ARH or the tree insurance policies to cover a different commodity or type of tree or the same type tree, or the same type of commodity in a different location, as maintenance unless the Board, at its sole discretion, determines that it would be impossible or impractical to insure the new commodity under the original 508(h) plan.