

Additional Base Acres for ARC-CO and PLC in Missouri

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The goal of this policy brief is to project the increase in base acres by covered commodity and county in Missouri for the 2026 crop year and beyond, under the One Big Beautiful Bill Act.

Policy Background

The One Big Beautiful Bill Act (OBBBA), signed into law on July 4, 2025, makes provisions to expand the number of base acres eligible for participation in the Agricultural Risk Coverage (ARC) and the Price Loss Coverage (PLC) programs, to align them with recent planting history. Since their introduction in the 2014 Farm Bill, ARC and PLC payments are tied to historical base acreage based on planting history during the 2009-2012 crop years. The 2018 Farm Bill allowed producers to update their program yields for the PLC payment calculation, but it did not allow for base acreage reallocation or expansion.

The OBBBA instructs the USDA Farm Service Agency (FSA) to allow for a one-time voluntary increase in the number of base acres nationwide, up to 30 million. Currently, base acres across

the 22 covered commodities[1] nationwide amount to 274.0 million acres (including generic and upland cotton base acres), of which 10.1 million base acres are in Missouri. While the allocation of existing base acres across covered commodities will remain unchanged, the actual increase in total base acres and its allocation across covered commodities will be highly influenced by the way in which FSA implements the mandate from the OBBBA. The FSA is expected to publish guidelines to implement said changes for the crop year 2026.

The expansion in base acres is expected to particularly benefit beginning farmers on farms that previously had limited base acres. According to the Census of Agriculture, in 2022, 46,312 producers in Missouri were identified as beginning farmers—producers with 10 or fewer years of farming experience—accounting for 30% of the state total.

Methodology

According to the OBBBA, a farm is eligible to receive an allocation of new base acres if the *updated base acres* exceed the total number of base acres for covered commodities on the farm on Sept. 30, 2024 (*current base acres*). The *updated base acres* shall be calculated as the historical average of planted, failed, and prevented acres to all covered commodities over crop years 2019–2023, plus the lesser of (i) 15% of the *total acres on the farm* and (ii) the *historical average* of planted, failed, and prevented acres to all noncovered commodities over crop years 2019–2023.

To showcase how FSA implementation decisions can result in different *updated base acres* by covered commodity, *total acres on the farm* are calculated using two alternative scenarios:

- Scenario 1 (“C+P”): *total acres on the farm* are calculated as the sum of cropland and permanent pasture acres from the 2022 Census of Agriculture.
    - Cropland acres are calculated as the sum of harvested cropland plus pastureland that could have been used for crops, plus other cropland.
    - Permanent pasture is defined as permanent pasture and rangeland, other than cropland and woodland pastured.
- Scenario 2 (“FSA”): *total acres on the farm* are calculated as the average of planted, failed, and prevented acres to covered and noncovered commodities over crop years 2019–2023 from FSA Crop Acreage Data. When a commodity is not planted or prevented planted in a

[1] The list of covered commodities includes wheat, oats, barley, corn, grain sorghum, long grain rice, medium/short grain rice, temperate japonica rice, seed cotton, dry peas, lentils, large and small chickpeas soybeans, peanuts, sunflower seed, canola, flaxseed, mustard seed, rapeseed, safflower, crambe, and sesame seed.

crop year, the corresponding null value for acreage in that year is included in the calculation of the 5-year average.[2]

Finally, given the explicit limitation on nationwide base acreage expansion across all covered commodities, when the total *additional base acres* at the national level—*updated base acres* minus *current base acres*, plus *unassigned generic base acres*[3]—exceed 30 million acres, the resulting calculation is scaled down to 30 million on a pro-rata basis. The allocation of the scaled-down *additional base acres* per farm across covered commodities is proportional to the ratio of (i) average of planted, failed, and prevented acres to each covered commodity over 2019–2023; to (ii) the average of planted, failed, and prevented acres to all covered commodities over the same period.

Data

Since base acres by farm are not publicly available, we treat all farms in the county as one single farm for this report. Furthermore, the total number of base acres for covered commodities by county on Sept. 30, 2024, is not yet publicly available, therefore, we use total base acres for covered commodities by county in crop year 2023 as an approximation.

In addition, counties with no planted, failed, or prevented acres in any covered commodities over crop years 2019–2023 are assumed to be ineligible for ARC or PLC.

To calculate planted and prevented acres to noncovered commodities, we exclude non-cropland areas and cropland areas that would result in double counting, such as cover crop area, acreage enrolled in the Environmental Quality Incentives Program (EQIP) or the Conservation Stewardship Program (CSP). Additionally, based on current definitions, idle and fallow cropland acres and cropland acres planted entirely to grass and pasture are ineligible for ARC or PLC, so we also exclude acres considered idle, fallow, grass, and mixed forage.[4] In summary, noncovered commodities are calculated as the difference between all crops and covered commodities, minus cropland acres under the following categories: EQIP, CSP, Conservation Reserve Program (CRP), Wetland Reserve Program, Grassland Reserve Program, Wetland Bank Reserve, Wildlife Habitat Incentive Program, cover crops, wildlife food plot, emergency watershed/floodplain, woodland/native understory, water impoundment structure, water bank, idle, fallow, grass, and mixed forage.

[2] For example, a farm with 100 acres planted in years 1 and 5 but no planted or prevented acres in years 2-4 would have an assigned average area of 40 acres (=200/5).
[3] Unassigned upland cotton base acres are treated as seed cotton base acres all scenarios in this report; thus, they are not included in the unassigned base acres.
[4] Only two categories of mixed forage, namely "2+ Interseeded Grass Mix" and "Native Grass Interseeded," are excluded from the definition of noncovered commodities.

Since some commodity types in Crop Acreage Data do not directly align with the list of 22 covered commodities eligible for ARC or PLC, the following assumptions were made to calculate planted, failed, and prevented acres for the following covered commodities:

- Peas only refer to peas for dry edible use (all crop types).
- Chickpeas (large) only refer to the garbanzo large Kabuli type.
- Chickpeas (small) only refer to the garbanzo small DESI or garbanzo small Kabuli types.
- Grain sorghum only refers to the grain type and the sorghum dual purpose with intended use for grain.
- Planted and prevented upland cotton acres and upland cotton (unassigned) base acres are applied to seed cotton production in our calculations.

Except for the exceptions listed in the previous paragraph, planted and prevented acres to each covered commodity are calculated as the sum of planted, failed, and prevented acres across all crop types and intended uses for each covered commodity.

Three county-level data sets are used to calculate changes in base acres:

a) Crop Acreage Data Reported to FSA for 2019-2023 crop years—January release—from USDA (2025)
b) Total base acres for crop year 2023 by county and commodity from USDA (2023)
c) Total cropland and pastureland reported by the 2022 Census of Agriculture from USDA (2024).

Results

At the national level, total *additional base acres* (including unassigned generic base acres) amount to 32.5 million acres in Scenario 1 (“C+P”), and 26.7 million acres in Scenario 2 (“FSA”). Hence, only in Scenario 1 the *additional base acres* must be scaled down to 30 million acres using a pro-rata basis. More details on projected additional base acres at the U.S. level are reported in Wongpiyabovorn and Plastina (2025).

The *additional base acres* in the state of Missouri across all covered commodities would be 1.25 million acres in Scenario 1 and 1.19 million acres in Scenario 2, accounting for 4.2%–4.4% of the national total. The *additional base acres* would bring expected *2026 base acres* in the state to 10.7–11.2 million acres, as shown in Table 1.

Table 1 also reports the *additional base acres* and total projected *2026 base acres* in Missouri by commodity from both scenarios. In a nutshell, 89%–90% of *additional base acres* would be distributed to soybeans and corn. Soybeans, the major crop growing in the state with almost 6 million acres planted in 2024 (USDA, 2025), account for most of the *additional base acres* at 0.67 million acres (54% of state total) in scenario 1 and 0.65 million acres (55% of state total) in scenario 2. About 0.41–0.44 million *additional base acres* would go to corn.

In addition, wheat and seed cotton would gain moderate numbers of *additional base acres* at 73,921–89,855 acres (6%–7% of state total) and 24,491–28,232 acres (2%), respectively. Other crops, namely barley, canola, chickpeas, dry peas, grain sorghum, long grain rice, medium/short grain rice, oats, peanuts, and sunflower seed, would receive a minor share (less than 1% each) of *additional base acres*.

The maps of total *additional base acres* by county (Figures 1a and 1b) highlight the similar pattern of *additional base acres* across scenarios. *Additional base acres* would be concentrated in counties located in Northern, Western, and Bootheel Missouri. More specifically, additional soybeans- and corn-base acres are mainly distributed to Northern and Western counties as this region accounted for 63% of corn-soybeans production in the state (USDA, 2024).[5] The allocation patterns of these two crops are similar to each other as they are typically substitutes in production (i.e., growing on the same land and using similar equipment and resources). Meanwhile, additional wheat-base acres are mostly in the Southwestern region, which produced 20% of total wheat in the state (USDA, 2024). The counties in the Southeastern (Bootheel) region, where most cotton is grown in the state, would receive all additional cotton-base acres for the state. Table 2 reports the *additional base acres* for soybeans, corn, wheat, and seed cotton at the county level from both scenarios.

In scenario 1, the counties with the highest *additional base acres* for all covered commodities would be Vernon County (64,649), Chariton County (61,673), and Johnson County (56,843). While 96%–97% of *additional base acres* allocated to Chariton County and Johnson County are for corn and soybeans, that share accounted for 85% of *additional base acres* in Vernon County with 14% of *additional base acres* allocated to wheat. On the other hand, the top three counties with largest *additional base acres* in scenario 2 would be Chariton (62,852), Vernon (50,490), and Dunklin (49,125). The top two counties in this scenario are the same as those in scenario 1, whereas Dunklin County ranks fifth in scenario 1. The majority of *additional base acres* in Dunklin County are allocated to seed cotton (39% of county total) and soybeans (29%). The differences in both scenarios highlight the importance of calculation assumptions on allocation of *additional base acres* at the county level.

Out of 114 counties, excluding St. Louis City, 25 and 27 counties in scenarios 1 and 2, respectively, would receive from null to less than 100 *additional base acres* across all covered commodities. These counties are mainly located in the South Central region, which accounted for less than 1% of corn, soybeans, and wheat production in the state (USDA, 2024).

[5] The calculation was based on production in Northwest, North Central, Northeast, and West agricultural district classified by USDA (n.d.)

Concluding Comments

The updated base acres for ARC and PLC from the enactment of OBBBA would benefit farmers who recently expanded their farms and capture more recent planting patterns, bringing base acres closer to the actual planted acres. The FSA is expected to develop guidelines to implement the general provisions of the OBBBA for 2026 crop year. While the final guidelines will differ from our calculations, this report provides estimates of *additional base acres* based on two scenarios to highlight the variations in possible outcomes that can be achieved depending on the details of the implementation procedures.

These results are relevant to policymakers involved in the development of said guidelines, and to inform farmers and other agricultural stakeholders about the potential impact of this piece of legislation on their safety net.

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References

U.S. Department of Agriculture. n.d. District and County Boundary Maps by State. National Agricultural Statistics Service. Available at https://www.nass.usda.gov/Charts_and_Maps/Crops_County/boundary_maps/indexpdf.php.

———. 2023. 2023 Total Base Acres by County. Farm Service Agency. Available at https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.fsa.usda.gov%2Fsites%2Fdefault%2Ffiles%2Fdocuments%2F2023_base_acres_by_county.xlsx&wdOrigin=BROWSELINK.

———. 2025. Crop Acreage Data. Farm Service Agency. Available at https://www.fsa.usda.gov/tools/informational/freedom-information-act-foia/electronic-reading-room/frequently-requested/crop-acreage-data. Last updated on January 10, 2025.

———. 2024. 2022 Census of Agriculture. National Agricultural Statistics Service. Available at https://www.nass.usda.gov/Publications/AgCensus/2022/.

Wongpiyabovorn, O., and Plastina, A. 2025. "Additional Bases Acre for ARC and PLC." RaFF Policy Brief 2025-7(2), Rural and Farm Finance Policy Analysis Center, University of Missouri, Columbia, July 16, 2025. Available at https://raff.missouri.edu/wp-content/uploads/2025/07/2025-07-2-RaFF-Policy-Brief.pdf.

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Table 1. Total Additional Base Acres and Projected 2026 Base Acres in Missouri by Commodity.

Commodity	Scenario1("C+P")				Scenario 2 ("FSA")			
	Add. base acres (acre)	% of Add. Base acres	2026 base acres (acre)	% of 2026 base acres	Add. base acres (acre)	% of Add. Base acres	2026 base acres (acre)	% of 2026 base acres
Soybeans	670,858	54%	4,116,012	39%	652,701	55%	4,328,010	39%
Corn	441,350	35%	3,930,553	37%	413,819	35%	4,015,601	36%
Wheat	89,855	7%	1,568,445	15%	73,921	6%	1,646,152	15%
Seed Cotton	24,491	2%	311,634	3%	28,232	2%	393,556	4%
Grain Sorghum	6,420	1%	451,538	4%	4,240	0%	468,650	4%
Rice - Long Grain	6,352	1%	255,876	2%	9,402	1%	300,493	3%
Oats	3,085	0%	28,058	0%	1,939	0%	26,912	0%
Peanuts	2,087	0%	2,225	0%	2,266	0%	2,404	0%
Barley	698	0%	4,854	0%	480	0%	4,636	0%
Sunflower Seed	586	0%	1,442	0%	311	0%	1,198	0%
Canola	74	0%	229	0%	61	0%	216	0%
Rice – Medium/Short Grain	66	0%	757	0%	149	0%	1,716	0%
Dry Peas	20	0%	20	0%	21	0%	21	0%
Large Chickpeas	0.2	0%	0.2	0%	0.2	0%	0.2	0%
Small Chickpeas	0.1	0%	0.1	0%	0.1	0%	0.1	0%
State Total	**1,245,942**	**100%**	**10,671,643**	**100%**	**1,187,543**	**100%**	**11,189,566**	**100%**

Note. There are no base acres for crambe, flaxseed, lentils, mustard seed, rapeseed, safflower, sesame seed, and temperate japonica rice in Missouri.

Table 2. Additional Base Acres for Soybeans, Corn, Wheat, and Seed Cotton in Missouri by County

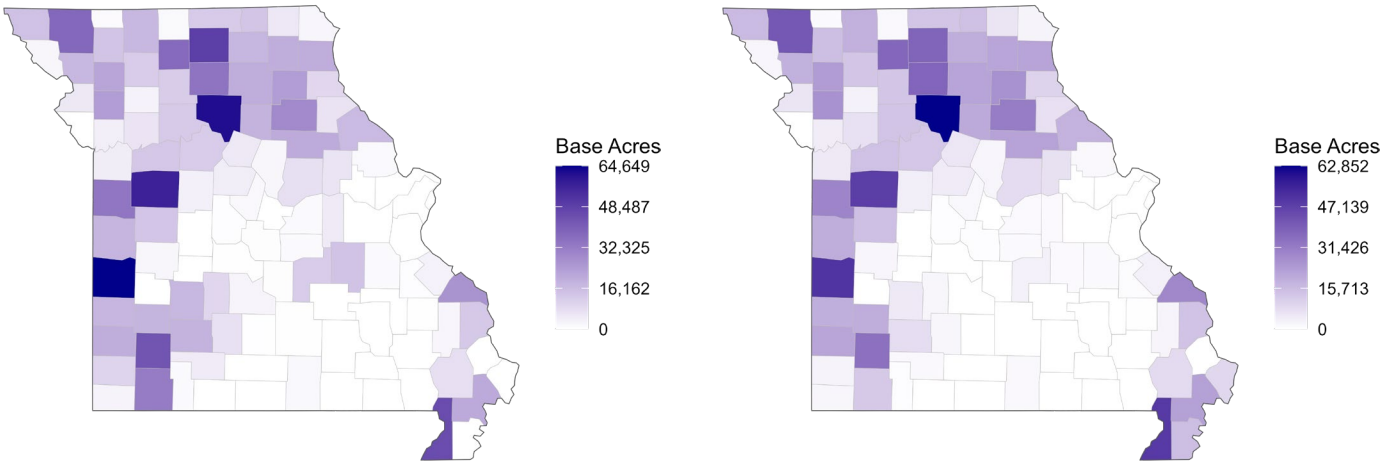
County	Additional base acres (acre)							
	Scenario 1 ("C+P")				Scenario 2 ("FSA")			
	Soybeans	Corn	Wheat	Seed Cotton	Soybeans	Corn	Wheat	Seed Cotton
Adair	11,944	5,495	311	-	12,920	5,945	336	-
Andrew	9,082	7,922	97	-	9,824	8,570	105	-
Atchison	6,968	7,997	18	0	7,537	8,650	19	0
Audrain	11,514	7,465	1,219	-	12,455	8,075	1,319	-
Barry	9,315	10,985	10,467	-	3,586	4,229	4,030	-
Barton	8,504	5,519	3,432	-	9,199	5,971	3,713	-
Bates	10,230	6,343	1,424	-	11,066	6,862	1,540	-
Benton	-	-	-	-	-	-	-	-
Bollinger	1,377	624	259	-	1,490	675	280	-
Boone	1,361	690	133	-	1,472	746	143	-
Buchanan	2,902	2,568	50	-	3,139	2,778	54	-
Butler	-	-	-	-	-	-	-	-
Caldwell	2,010	946	100	-	2,174	1,024	108	-
Callaway	4,444	2,317	593	-	4,807	2,506	642	-
Camden	141	173	-	-	-	-	-	-
Cape Girardeau	7,923	3,570	1,474	-	8,571	3,862	1,594	-
Carroll	7,074	5,429	273	-	7,652	5,873	295	-
Carter	-	-	-	-	-	-	-	-
Cass	21,650	11,519	929	-	18,556	9,873	797	-
Cedar	36	17	9	-	39	19	10	-
Chariton	36,811	23,158	1,679	-	37,515	23,601	1,711	-
Christian	1,757	1,666	1,109	-	582	552	367	-
Clark	1,251	1,161	24	-	1,353	1,256	26	-
Clay	2,386	1,489	96	-	2,581	1,611	104	-
Clinton	12,940	10,886	123	-	13,997	11,776	133	-
Cole	-	-	-	-	-	-	-	-
Cooper	2,252	1,689	329	-	2,436	1,827	355	-
Crawford	8,840	4,225	1,026	-	821	392	95	-
Dade	7,971	5,497	4,448	-	8,622	5,947	4,811	-
Dallas	4,410	2,982	1,702	-	980	663	378	-
Daviess	7,787	4,416	160	-	8,423	4,777	173	-
DeKalb	12,339	9,296	227	-	13,347	10,055	245	-
Dent	-	-	-	-	-	-	-	-
Douglas	-	-	-	-	-	-	-	-
Dunklin	13,019	5,816	2,683	17,528	14,083	6,291	2,902	18,961
Franklin	-	-	-	-	-	-	-	-
Gasconade	2,865	1,846	233	-	742	478	60	-
Gentry	8,425	5,526	191	-	9,114	5,978	206	-
Greene	8,135	6,304	3,759	-	3,457	2,679	1,597	-
Grundy	23,771	13,173	253	-	23,574	13,064	251	-
Harrison	9,628	7,384	128	-	10,415	7,987	139	-

County	Additional base acres (acre)							
	Scenario 1 ("C+P")				Scenario 2 ("FSA")			
	Soybeans	Corn	Wheat	Seed Cotton	Soybeans	Corn	Wheat	Seed Cotton
Henry	8,899	3,651	1,282	-	9,626	3,949	1,387	-
Hickory	-	-	-	-	-	-	-	-
Holt	961	1,095	14	-	1,039	1,184	15	-
Howard	2,847	2,205	231	-	3,079	2,386	250	-
Howell	365	1,263	117	-	314	1,087	101	-
Iron	-	-	-	-	-	-	-	-
Jackson	2,592	1,690	72	-	3,100	2,022	86	-
Jasper	9,268	4,968	5,346	-	10,026	5,374	5,783	-
Jefferson	-	-	-	-	-	-	-	-
Johnson	34,272	20,388	2,071	-	28,880	17,180	1,745	-
Knox	11,356	7,987	274	-	12,284	8,640	297	-
Laclede	880	1,556	152	-	9	17	2	-
Lafayette	6,882	6,389	287	-	7,445	6,911	310	-
Lawrence	16,663	15,515	9,763	-	13,305	12,388	7,796	-
Lewis	10,390	9,156	328	-	11,240	9,904	355	-
Lincoln	855	468	81	-	925	507	88	-
Linn	22,335	11,143	1,186	-	24,161	12,054	1,283	-
Livingston	8,435	3,502	247	-	9,125	3,789	267	-
McDonald	997	851	896	-	700	597	629	-
Macon	13,595	5,860	526	-	14,706	6,339	569	-
Madison	206	60	16	-	223	65	18	-
Maries	779	356	76	-	788	360	77	-
Marion	4,881	4,413	253	-	5,280	4,774	274	-
Mercer	939	509	20	-	1,016	551	22	-
Miller	296	123	18	-	320	133	20	-
Mississippi	-	-	-	-	5,673	2,064	1,342	67
Moniteau	872	581	119	-	943	629	129	-
Monroe	16,763	10,948	1,026	-	18,133	11,843	1,110	-
Montgomery	3,605	2,358	515	-	3,899	2,551	557	-
Morgan	318	189	45	-	344	205	48	-
New Madrid	9,936	3,403	583	5,501	10,748	3,682	631	5,951
Newton	4,080	3,036	3,003	-	1,122	835	826	-
Nodaway	19,657	17,932	275	-	21,264	19,398	297	-
Oregon	-	-	-	-	-	-	-	-
Osage	629	481	59	-	681	520	64	-
Ozark	-	-	-	-	-	-	-	-
Pemiscot	-	-	-	-	8,642	1,304	1,202	1,672
Perry	14,510	7,903	3,956	-	15,697	8,549	4,279	-
Pettis	2,069	1,385	189	-	2,238	1,498	204	-
Phelps	5,435	5,945	292	-	1,489	1,629	80	-
Pike	9,027	6,787	783	-	9,765	7,342	847	-
Platte	-	-	-	-	-	-	-	-
Polk	6,978	7,193	2,751	-	2,078	2,143	820	-

County	Additional base acres (acre)							
	Scenario 1 ("C+P")				Scenario 2 ("FSA")			
	Soybeans	Corn	Wheat	Seed Cotton	Soybeans	Corn	Wheat	Seed Cotton
Pulaski	223	224	7	-	71	71	2	-
Putnam	7,597	4,620	267	-	8,218	4,997	289	-
Ralls	3,662	2,743	201	-	3,962	2,967	217	-
Randolph	11,979	5,540	965	-	12,958	5,993	1,044	-
Ray	4,051	2,172	133	-	4,383	2,350	144	-
Reynolds	-	-	-	-	-	-	-	-
Ripley	-	-	-	-	-	-	-	-
St. Charles	-	-	-	-	-	-	-	-
St. Clair	1,224	541	330	-	1,324	585	357	-
Ste. Genevieve	1,794	966	276	-	1,940	1,045	298	-
St. Francois	550	207	63	-	595	224	68	-
St. Louis	-	-	-	-	-	-	-	-
Saline	5,906	6,077	215	-	6,389	6,573	233	-
Schuyler	8,588	5,329	112	-	8,979	5,572	117	-
Scotland	3,045	2,514	72	-	3,293	2,719	78	-
Scott	-	-	-	-	-	-	-	-
Shannon	-	-	-	-	-	-	-	-
Shelby	15,317	8,257	394	-	16,570	8,932	426	-
Stoddard	3,151	1,748	462	1,462	3,409	1,891	499	1,581
Stone	252	727	183	-	138	398	100	-
Sullivan	32,818	15,713	424	-	25,199	12,065	326	-
Taney	-	-	-	-	-	-	-	-
Texas	34	282	5	-	-	-	-	-
Vernon	33,370	21,314	9,111	-	26,061	16,646	7,116	-
Warren	-	-	-	-	-	-	-	-
Washington	1,034	110	26	-	1,119	120	28	-
Wayne	-	-	-	-	-	-	-	-
Webster	1,907	4,309	787	-	539	1,218	222	-
Worth	661	424	5	-	715	459	6	-
Wright	60	145	7	-	-	-	-	-
State Total	**670,858**	**441,350**	**89,855**	**24,491**	**652,701**	**413,819**	**73,921**	**28,232**

Note. The dash (-) denotes no base acres for the specific commodity, while 0 indicates a small number of base acres.

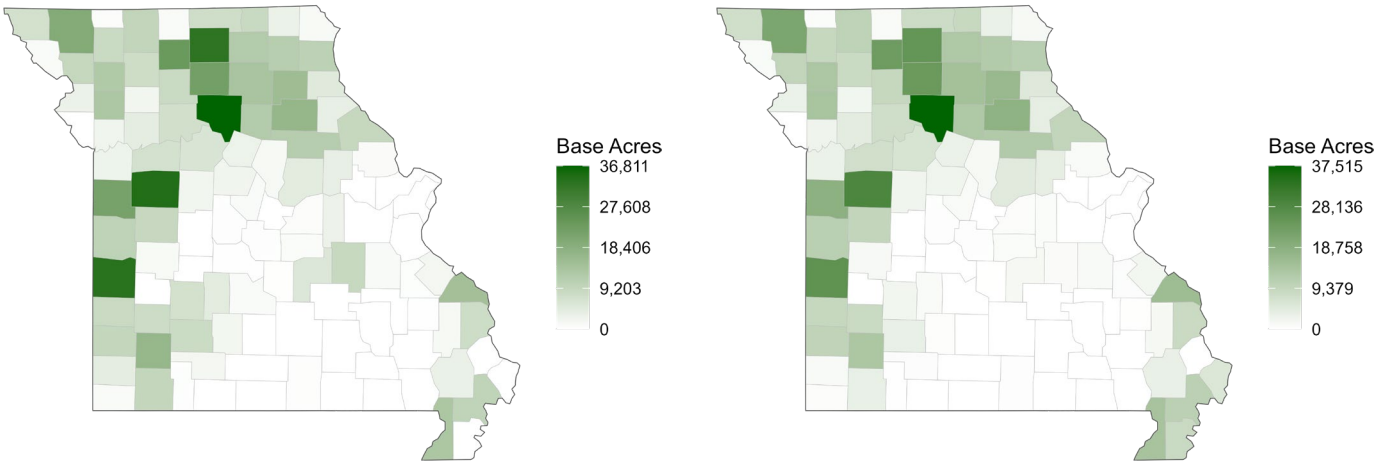
Figure 1. Additional Base Acres Allocated to All Covered Commodities in Missouri



Panel A. Scenario 1 ("C+P")

Panel B. Scenario 2 ("FSA")

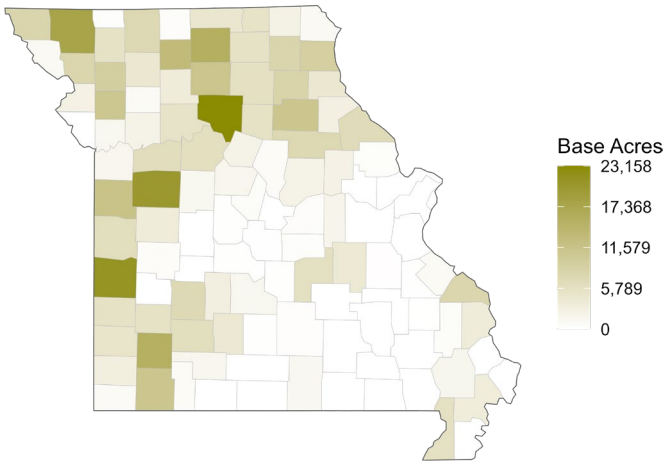
Figure 2. Additional Base Acres Allocated to Soybeans in Missouri



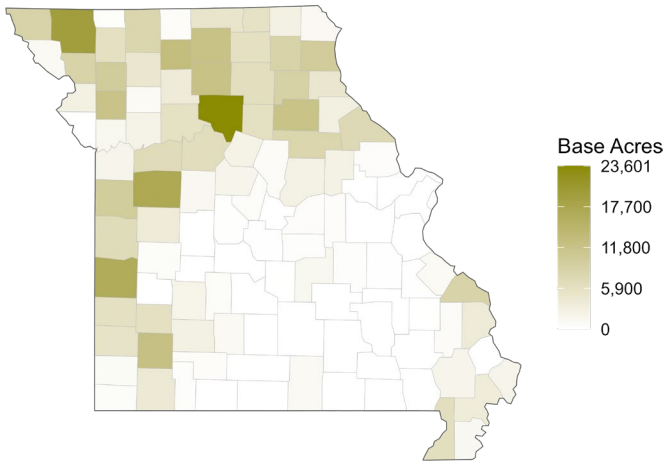
Panel A. Scenario 1 ("C+P")

Panel B. Scenario 2 ("FSA")

Figure 3. Additional Base Acres Allocated to Corn in Missouri

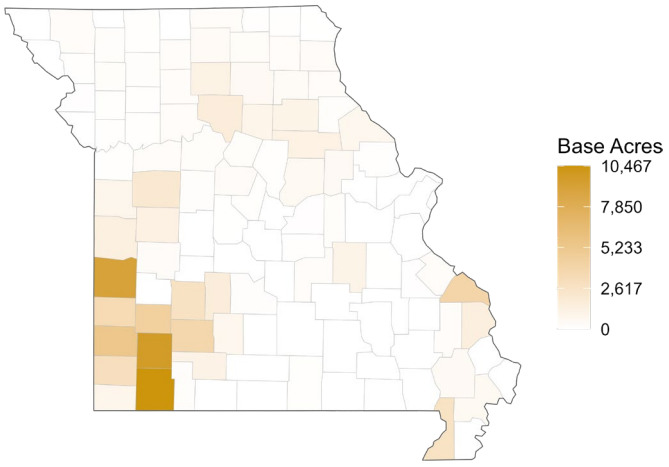


Panel A. Scenario 1 (“C+P”)

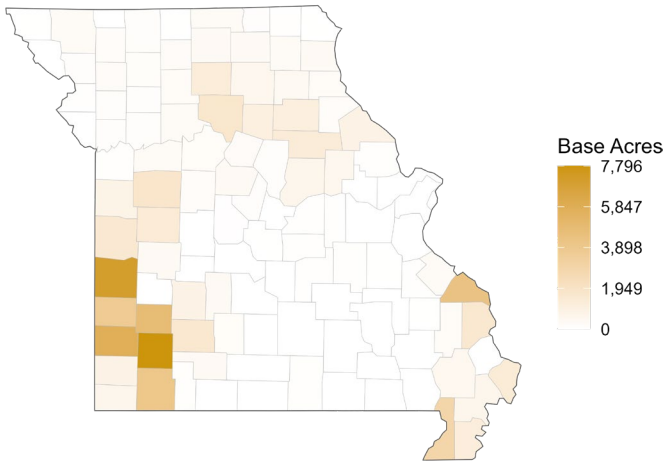


Panel B. Scenario 2 (“FSA”)

Figure 4. Additional Base Acres Allocated to Wheat in Missouri

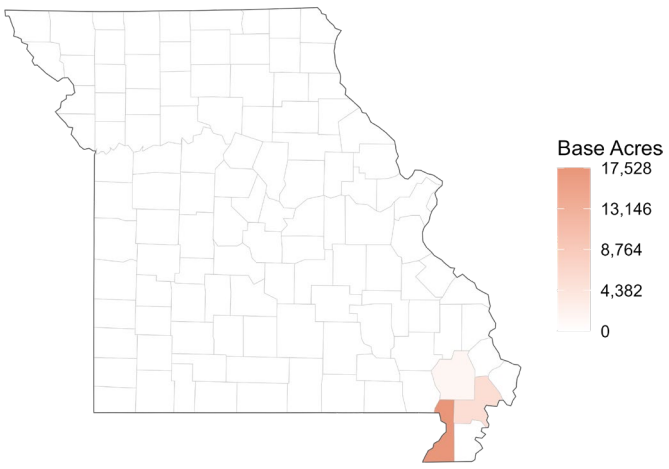


Panel A. Scenario 1 (“C+P”)

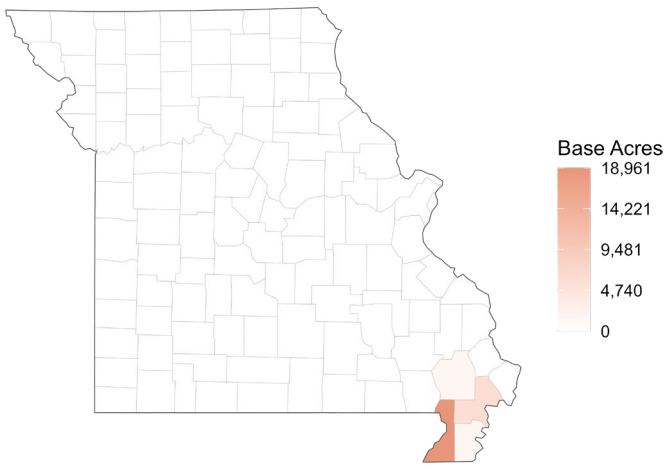


Panel B. Scenario 2 (“FSA”)

Figure 5. Additional Base Acres Allocated to Seed Cotton in Missouri



Panel A. Scenario 1 (“C+P”)



Panel B. Scenario 2 (“FSA”)