

Comparison of Payment Limitation Proposals

	CURRENT LAW	JUNE 14 HOUSE AGRICULTURE PROPOSAL	DORGAN-GRASSLEY BILL (S. 1486)
Direct Attribution of Payments to Real Persons	NO	YES	YES
Crack Down on “Paper” Farms	NO	NO	YES
Generic Certificate Loophole	YES	YES	NO
Forfeiture Loophole	YES	YES	NO
Active Management Loophole	YES	YES	NO
Beneficial Interest Loophole	YES	YES	NO
Penalties for Fraud	NO	NO	YES
Direct Payment Cap	\$80,000	\$80,000	\$40,000
Counter Cyclical Payment Cap	\$130,000	\$130,000	\$60,000
MLG and LDP Cap	\$150,000 but ineffective – in reality no limit	None	\$150,000 real limit
Total Effective Limitation	None	None	\$250,000
Bottom Line	No Reform - Widespread Abuse	Minor Reform – Continued Widespread Abuse	Real Reform – Enforceable Limits