

Congress of the United States
Washington, DC 20515

February 27, 2023

The Honorable Tom Vilsack
Secretary
United States Department of Agriculture
1400 Independence Avenue, S.W.
Washington, DC 20250

Dear Secretary Vilsack,

We write to urge you to take necessary actions to improve the operation of programs serving farmers and ranchers across the nation. Specifically, we urge USDA to ensure that all forms match actual farm program requirements, make all USDA forms available for submission online, and invest in Farm Service Agency (FSA) staff training to improve program implementation.

USDA Forms Should Match Program Requirements

Congress and USDA request an array of information from agricultural businesses to establish eligibility for farm programs, determine benefit levels, and gather data to assess the impact of such programs. Unfortunately, and too frequently, USDA and subsidiary agency forms request information of agricultural businesses which does not align with that used to make eligibility and benefit decisions. The disconnect between information requested and the information needed to make decisions delays eligibility and benefit determinations, increases costs at USDA, and can result in erroneous decisions. Further, farms are often forced to hire outside consultants to ensure that they correctly provide the information USDA requests - and have available - the data USDA will need, but that they do not request in the forms.

USDA should initiate a review of farm program forms and ensure that data required for forms reflects the data required to determine program eligibility and benefits.

All USDA Farm Program Forms Should Be Available for Online Submission

While most federal agencies have moved to online form submission, many USDA farm programs still require on paper forms, which USDA personnel often must then convert to another format entirely in their internal electronic systems.

A particularly notable example of this problem is Form CCC-902E, the primary form the FSA uses to make eligibility determinations for farm program participation. Farmers frequently prepare this paper-only form, which can have an outsize influence on their livelihood, only for

FSA county offices to then copy the data into another format entirely in their computer system. The process creates opportunities for errors to occur, increases demands on staff time, and prevents farmers from ensuring their data is entered correctly.

USDA should address this by strengthening Farmers.gov to ensure that all forms required for participation in FSA, Natural Resource Conservation Service, and other farm programs are available in digital, fillable, and submittable formats.

Investment in FSA County Staff Training Will Improve Program Implementation

Too frequently, FSA staff in different states, and sometimes even in different county offices in the same state, apply FSA rules and regulations differently. Turnover and transfers can result in new staff who received different training than existing or previous staff, resulting in different interpretations.

After more than two years of remote work and training, USDA should return to in-person group training sessions when new policies are implemented to ensure that all staff have consistent understandings of how rules and regulations should be applied.

Complete Implementation of Section 1614 of the 2014 Farm Bill (as amended by section 1706 of the 2018 Farm Bill)

In the previous two Farm Bills, Congress has provided direction to FSA aimed at reducing burdens on producers and FSA employees by streamlining the communication between FSA and the Risk Management Agency (RMA), allowing producers or agents of a producer to report data electronically to FSA, and take advantage of new technologies and third-party providers to allow use of geospatial and precision agriculture data. These reforms – if fully implemented – will reduce cost and administrative burdens on producers and FSA employees.

USDA plays a key role in ensuring that our nation’s agricultural sector is the most innovative and productive in the world. Implementing these modest reforms will ensure that USDA programs which incentivize that innovation function as intended, reduce costs to taxpayers, and help farmers determine how to navigate often challenging requirements.

Sincerely,



Dan Newhouse
Member of Congress



Austin Scott
Member of Congress

Glenn "GT" Thompson
Member of Congress

James Moylan
Member of Congress

Jake Ellzey
Member of Congress

Harriet M. Hageman
Member of Congress

Eric A. "Rick" Crawford
Member of Congress

Dusty Johnson
Member of Congress

James R. Baird
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Ronny L. Jackson
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John Duarte
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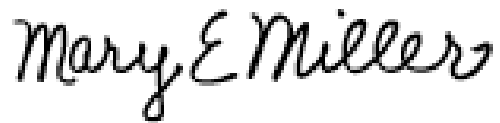
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