



October 2, 2023

Ruth Brown
Departmental Information Collection Clearance Officer
U.S. Department of Agriculture
Farm Service Agency
1400 Independence Avenue SW
Washington, DC 20250-0522

Re: Comments on Guaranteed Farm Loan Program, OMB Control Number 0560-0155

Submitted via [reginfo.gov](https://www.reginfo.gov)

Dear Ms. Brown,

California FarmLink welcomes the opportunity to comment on the proposed data collection and reporting requirements for the Farm Service Agency's (FSA) Guaranteed Loan Program, and as outlined in the Federal Register Notice 88 FR 60430.

As a Community Development Financial Institution (CDFI) that specializes in agricultural lending and as an FSA Guaranteed Lender, it is vital to our mission to support and expand lending to underserved farming communities. Transparency and accountability are central to how we do business, and we believe it is vitally important to strive for greater transparency on who is, and who isn't being served across all lending programs - our own, as well as those supported by the FSA.

Since becoming a CDFI certified by the Department of Treasury in 2013, FarmLink has cultivated lending relationships with over 325 borrowers in 37 California counties. Between 2020 and 2022, FarmLink facilitated FSA guarantees on 29 loans, and \$11.4 million in volume. As of August 2023, FarmLink had 45 FSA guaranteed loans outstanding (\$11.6 million), and 80% of this volume was to support socially disadvantaged farmers. In addition, through our partnership with the FSA, FarmLink assists 15-20 qualified socially disadvantaged farmers per year in directly accessing FSA lending and loan guarantee programs.

Based on our mission, and our experience as an agricultural lender dedicated to serving low income and Latino farmers, we support the continued data collection and reporting requirements on FSA guaranteed loan programs. We agree that the FSA needs data to understand specific demographic lending trends, as well as other relevant factors that will help increase access to capital to underserved communities - including socially disadvantaged and limited resource borrowers.

While we support transparency in lending to increase access for underserved communities and target lending capital, we do so with some concerns about the possibility of data being used for the opposite purpose - to limit or restrict lending to specific communities or individuals. We encourage the FSA to consider strong controls on how data is used to inform program decisions and decisions on individual loans.

We thank you for your consideration, and would welcome the opportunity to provide any additional feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Reggie Knox", with a stylized flourish at the end.

Reggie Knox