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Increasing Land, Capital, and Market Access Program

Comment On: FSA-2023-0001-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Increasing Land, Capital, and Market Access Program

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Comment on FR Doc # 2023-01754

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General Comment

Berkshire Funding Focus (BFF) is an initiative hosted by the Berkshire Regional Planning Commission as the fiscal agent. BFF was established to support Berkshire County entities seeking federal and state funds for pandemic-related recovery and rebuilding organizational and sector capacity for the long term. One of BFF's core operating principles is equity.

The purpose of the Increasing Land, Capital, and Market Access Program (Program) is to fund projects that support a diverse set of farmers, ranchers, and forest landowners (producers) on the edge financially; moving them from surviving to thriving as they address core barriers to attain land, capital, and market access.

USDA issued this information request (Docket ID FSA-2023-0001) to evaluate their proposed collection of information from grant awardees, in part seeking to minimize the burden of information collection on those who respond (page 5852, column 1, paragraph (4)).

Program grantees will be expected to submit quarterly and annual reports of project activities (page 5851, column 2, bottom paragraph). Of the seven reporting requirements that grantees will be expected to measure and report progress on is one that we feel will be burdensome – not to the grantee, but to the underserved farmers/producers that this funding and their funded project is intended to assist:

4. Data identifying outcomes, improvements, and impact on underserved producers' business and financial conditions (page 5851, column 3, number 4.).

In 2022, the University of Vermont (UVM) released a report titled "Farmer Perspectives on Administrative Burdens & Potential Compensation Structures." While they were specifically focused on a soil health payment for ecosystem services program, a key message that they gleaned through farmer interviews is applicable to a wide range of grant-funded projects: "nearly all farmers said they would weigh the time and energy put into the administrative workload against the perceived benefits and value of the program, i.e., the payment level or technical assistance provided."

We are concerned that the administrative burden of meeting reporting requirement #4 will be shifted from

the grantee to the underserved farmer/producer. USDA should explore ways to avoid this unintentional outcome. If the data described in #4 can be obtained through “paperwork” that farmers are already providing to USDA or could be tied into that “paperwork,” that would be ideal. If not, grantees should be required to design their data collection processes to minimize the burden on underserved farmers/producers.

Vermont farmers also expressed concerns about data privacy to UVM; as one stated: “Where this data goes might affect my willingness to do administrative paperwork. Who's going to own this data and how might it be used in the future or not?”

We note that the Fiscal Year 2022 Increasing Land, Capital, and Market Access Program National Funding Opportunity (USDA-FSA-LANDACCESS-22-NOFO0001219) required applicants to “Include a statement of plans to protect confidentiality, personal privacy, proprietary interests, business confidential information, and intellectual property rights.” Grantees should be required to inform the underserved farmers/producers of these plans and with whom certain data will be shared. We recommend that data on business and financial conditions be shared with USDA, project partners and the public only in the aggregate and only then if the sample size is large enough to obscure any individual farmer/producer’s data.

Thank you for your consideration of these comments.

Citation: Ellen Friedrich, Nour El-Naboulsi, Alissa White and Heather Darby. 2022. Farmer Perspectives on Administrative Burdens & Potential Compensation Structures: A Short Summary Report of Farmer Interviews from Spring 2022. Vermont Payment for Ecosystem Services Technical Research Report #3c. University of Vermont.

Attachments

3c. Farmer interviews report _VTPES Report 3c