



December 4, 2023

Office of Management and Budget
The White House
1600 Pennsylvania Ave NW
Washington, DC 20500

Re: National Young Farmers Coalition Comments on Reporting Requirements for FSA Increasing Land, Capital, and Market Access Program

The National Young Farmers Coalition (Young Farmers) appreciates the opportunity to submit comments regarding reporting requirements of the Farm Service Agency's Increasing Land, Capital, and Market Access Program (ILA).

Young Farmers is a grassroots network shifting power and changing policy to equitably resource our new generation of working farmers. We work closely with young farmers across the country to understand the challenges they are grappling with in pursuing their farming dreams, growing food for their communities, and stewarding our natural resources.

The [top challenge](#) that growers and land stewards across the country face is equitable access to affordable, quality farmland. This barrier is even greater for historically underserved farmers and ranchers. Land is deeply intertwined with all aspects of farmers' success and impacts more than agricultural communities. Land access is critical to the health and well-being of our environment, economy, and marginalized communities. We believe in the need for federal investment to address the interconnected challenges of land, capital, and market access.

We highly support this groundbreaking program and USDA's efforts in creating and administering it. We look forward to continued partnership with USDA and the Administration to address the challenges young farmers face.

Comments on whether the collection of information is necessary for the proper performance of the functions of the agency

Gathering information on the performance of the ILA program is an important step in assessing and sharing the impact of this historic funding. Particularly, it is important to collect this information in order to assure that the program is reaching and serving the intended recipients.

NATIONAL YOUNG FARMERS COALITION

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Ways to enhance the quality, utility and clarity of the information to be collected

We offer the following recommendations for enhancing the quality, utility, and clarity of the information to be collected:

- **Provide clear instructions** – Include clear instructions throughout the reporting documents that help organizations navigate the level of detail required and how to use their own interpretation when it comes to understanding what is required. We strongly believe this will help reduce the disparity in time it may take to interpret and respond to reporting requirements for organizations that are comfortable with USDA reporting versus those navigating it for the first time, as well as enhancing the quality of responses. For organizations that have submitted reports previously, it may feel easy to navigate minimal instruction and knowing what level of detail to provide or when it is ok to use their own interpretation on an instruction even if what is being asked is not entirely clear. For organizations with less familiarity and that have never encountered a reporting form like this before, however, it is likely to take much longer to complete the form because they will have less comfort and confidence in their interpretations of what is being asked.
 - An example of this might be adding a caveat that, “Short, bullet point responses that convey the overall process are acceptable.”
 - Additionally, we suggest clarifying wherever possible if what is being asked is a number, description, or combination of both.
- **Clarify & define** – We recommend re-iterating the definition of underserved producers, along with any other key words or phrases that are central to reporting, that USDA is using to give better data and ensure all reporting organizations are assessing similarly. We recommend clarifying outcomes and indicators wherever possible.
 - In places where a word or phrase like “producers start farming” might be open to interpretation, give instruction such as, “Please comment briefly on how your organization defines what it means to start farming,” or provide a clear definition.
 - Other metrics that may be used, such as “increased land ownership” and “increased land succession” would also benefit from clear definitions. Is USDA interested in acres or individuals, and does land succession refer to the actual deed transfer or simply having a succession plan in place? If USDA is interested in a broad range of answers, it would be helpful to clarify and let organizations know that they should self-identify how they are measuring these metrics.
- **Accomplishments** –Where possible, avoid asking awardees to estimate the “total percentage of work completed on the project.” Instead, a meaningful assessment may be asking awardees to quantify or comment on the tasks and milestones outlined in the proposal that are in-progress/completed.
- **Allow for comments on metrics** – Wherever possible, if awardees are asked to share a numeric evaluation of success towards a specific metric, we suggest also including an open text box for comment on the metric. This will provide for a clearer picture of status, especially if the final number won’t come until the end of the project.
- **Barriers** – We recommend including language asking awardees about barriers. Given that the ILA program is centered around addressing barriers related to land, capital, and market access, we feel it would make sense to recognize and provide space for organizations to comment on

structural challenges causing barriers to various aspects of project execution.

Ways to minimize the burden of the collection of information on those who are to respond

We offer the following recommendations for minimizing the burden of the information collected on those who are to respond:

- **Gather awardee feedback** – Above all, we recommend involving awardees themselves in designing and providing feedback on the reporting process, and building in openness to making adjustments throughout the five-year span of projects based on what is shared.
- **Increase the time interval** – Shift the reporting requirement to at least every six months, and ideally annually, in order to reduce administrative burden on grantees, particularly since this program has a focus on assisting underserved producers. We feel that the data available for quarterly reporting at the outset of projects in particular will be very nascent and may add an undue administrative burden to awardees.
- **Eliminate duplicate paperwork** – Eliminate duplicative parts of the profile or populate the content ahead of time to the degree possible in order to reduce paperwork for awardees. In particular, allow awardees to attach existing budget documents in excel form rather than entering numbers into a form, which is onerous and could lead to mistaken data entry.
- **Offer verbal reporting opportunities** – We recognize this may not be possible with USDA capacity, and that metric collection is important for government spending accountability, but we recommend to whatever degree possible USDA provide one-on-one conversation around reporting in addition to requiring a written form.
 - For example, a reporting process that is supportive to a low-resource organization unexperienced with USDA programs might look like sharing the reporting form at the onset of the project and having a call with the organization to walk through it and establish the key metrics that organization should be tracking relative to their project. Then, once every six months, having another phone call where staff from USDA talk through the metrics and how the project is going with the organization and help fill out the responses for USDA's records. This would require the organization to do prep work and assess impacts to be ready for the phone call, and it would result in documentation, but it would help the organizations navigate the key information that needs to be shared about project activities and updates rather than spending a large amount of time with paperwork that is redundant in many areas or might leave them guessing how detailed to be in their reporting.
- **Let awardees define success** – We recognize USDA has constraints on the type of metrics that need to be collected and reported for this program and a need to assess outcomes across awardees, but recommend incorporating wherever possible flexibility for organizations to comment on definitions of success that aren't easily quantifiable.
- **Collect qualitative data** – Similarly, there may be a lot of richness to gain from encouraging awardees to share their perspective on what it has meant for their communities at large to receive this funding and how they see farmer well-being and mental health being impacted. This may look like adding a specific question, or adding language throughout encouraging these types of

comments from awardees.

- **Provide flexibility** – Some processes that are central to certain metrics, such as acquiring land or a farm loan, may take time and may not be a relevant reporting point until the final year(s) of the project. Other benefits and results may not materialize until the years following the project. It will be helpful for the evaluation forms to recognize this and give clear instruction to awardees on how to comment on results that may take years to materialize.
- **Cumulative vs. one-off reporting** – Provide clear instructions to awardees about whether each report needs to provide a comprehensive picture of achievements to date or can simply comment on achievements since the last report. We recommend the latter, and providing clear instructions to awardees to not create additional work.
- **Comprehensive vs. specific** – Where possible, allow awardees to comment on total number of an activity versus the specific instances to reduce time completing reporting requirements while still capturing impact.
- **Prior notice** – to whatever degree possible, making sure organizations are aware of what will be asked on the reporting form at the onset of the project to help them be proactive about collecting anecdotes, quotes, and metrics while project activities are happening.
- **Increase transparency** – Overall, it would be helpful to provide additional transparency to reporting forms through introductory language at the top or through communications externally on what the intention behind this reporting and data collection is. This might look like sharing why specific questions are being asked and what answering them achieves. It would also be helpful to comment on how organizations that have questions can get clarity on the specificity of data points requested.
- **Interactive instruction** – Lastly, we would recommend a webinar or other interactive format for sharing information and expectations about reporting requirements with awardees that would allow for engagement with USDA.

Again, thank you for the opportunity to provide these comments. Young Farmers would be happy to discuss collaboration or how we could further assist in providing clarity and support to awardees.

Sincerely,



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National Young Farmers Coalition