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U.S. Department of Agriculture, FSA
STOP 0517
1400 Independence Ave., S.W.
Washington, DC 20250-0517

Submitted via www.regulation.gov

Subject: Information Collection; Customer Data Worksheet Request for Service Center Information Management System (SCIMS) Record Changes

Dear Farm Service Agency:

The Rural Coalition, National Latino Farmers and Ranchers Trade Association and the undersigned members and allies, write to share comments and concerns that they have identified regarding the extension of a currently approved information collection instrument to support Customer Data Worksheet Requests for record changes in the Service Center Information Management System (SCIMS) that contains producers' personal information. Specifically, the Farm Service Agency (FSA) is requesting comment on the form AD-2047, "Customer Data Worksheet Request for SCIMS Record Change." **We support the extension of the collection of the data and offer the following additional input.**

The proposed Notice identified in the Federal Register provides producers with a quick method to update their personal information, information that will constitute part of the official USDA program files. Our concerns rest with both the process and the content the Directives.

1. Importance of Accurate Customer Data on Farmers and Ranchers

The Service Center Information Management System (SCIMS) forms the basis for connecting producers to the programs of USDA. USDA should assure its central database of farmers and ranchers, and landowners contains up-to-date and complete information on each operation and that automatically links the farmers to useful and applicable programs.

We recommend that USDA consider basic improvements in functionality of the current SCIMS system in order to assure it links to other systems that are important to both producers and to the Department. Most important, this database should link to other basic information data to make one eligible for programs targeted for historically underserved producers, including status as socially disadvantaged and veteran producers as well as limited resource and beginning farmers and ranchers. This data should be collected as it is now collected by NASS and on AD-2106 where producers are not asked if they are socially disadvantaged but are instead asked the particular racial, ethnic or gender group to which they belong. Eligibility requirements for these programs should be explained

separately from the database. Once the producer identifies himself or herself as being a member of an eligible race, ethnicity or gender, this information should be entered into and retained in the database and the producer should be readily informed of the additional benefits he or she is eligible for as a socially disadvantaged producer.

In order to prevent USDA program application forms from being unnecessarily duplicative and repetitive, each producer or farm entity should have a single entry in the central database. USDA should focus efforts on keeping this database updated and correct, and should have a formal process for regular updating developed with public comment and input for when and how records are updated and/or cleared from the database.

To reduce duplication and time spent completing paper work, each producer's information, as contained in the database, should be made accessible to that producer online, and via computers available in USDA offices for use by producers. The database should form the basis for all producer applications to all USDA programs that serve farmers and ranchers and for all required reports including crop reports and disaster reports. Producers should not have to reenter basic information with each application. They should also be able to access and view online information and data entered on their previous applications with a link to FSA to request updating of information by means of the AD- 2047 form that is the subject of this comment.

The system should also provide electronic receipts for service received that can be printed in each USDA office and provided to producers without online access.

The information collected on this form also relates to the eligibility of the producers to run for and vote in County Committee Elections. FSA should proactively make this connection and assure that producers understand what requirements they must meet to be eligible to participate in these elections.

In addition to questions on participation in FSA, NRCS and RD programs, the form should also include a question about whether a producer produces or would generally produce \$1000 or more in gross farm sales each year. All producers who answer this question should be automatically included in each Census of Agriculture. Since the Census of Agriculture is a USDA program, all producers who check this box should also automatically be considered eligible to vote in Farm Service Agency county committee elections.

2. Equity in Participation in USDA Programs Serving Farmers: The Need for Accurate Information

According to recently published Agricultural Census data, there is sufficient evidence to argue that the need for tracking and updating personal producer data will only increase in the future as more beginning and historically underserved participants choose to participate. The need for these connections is great. Per the Census data:

- Young, beginning principal operators who reported their primary occupation as farming increased 11.3 percent from 36,396 to 40,499 between 2007 and 2012.

- All categories of minority-operated farms increased between 2007 and 2012; the Hispanic-operated farms had a significant 21 percent increase.¹

3. Relationship to Transparency and Accountability in USDA Programs - Section 14006 of the 2008 Farm Bill requires the Secretary of Agriculture to compile annual application and participation rate data, including numbers and percentages, for each county or parish and state in the United States, organized by race, gender and ethnicity. This information is critical to developing transparency and accountability in the way USDA operates programs. To date, these mandated provisions have yet to be fully implemented nationally or locally. In order to comply with these provisions, USDA must streamline reporting requirements and adopt technologies that have the capacity to collect this critical data and generate detailed reports quickly.

Often, historically underserved producers are more in need of services in USDA county offices and increasing this service to support their needs and economic contributions to their communities is a strong reason for keeping county offices open and accessible. This collection of information is necessary for the proper performance of the function of the agency.

If the needs served by forms AD-2047 and AD-2106 were updated and linked to each other, this action would facilitate the voluntary collection of valuable data that is invaluable to the operations of the Department. The Form AD-2047 is short and only requires the producer to complete one page of personal information with the USDA personnel. We believe that USDA and FSA in particular should connect the completion of this form with outreach to producers to complete the related AD-2106 on related civil rights issues in agriculture. Our view is that it would be most optimal if the two forms were connected and if the second was considered useful to the agency as well as for civil rights compliance. For example, outreach could be conducted based updated information that involved a new and beginning producer. Additional demographic data would indicate trends, which may be used as indicators of where USDA resources could be better utilized according to demand.

We strongly urge USDA to conduct a proactive initiative to reach out to all producers for a renewed collection of the information on form AD-2047 and related form AD-2106 in order to assure that USDA has correct data on all producers. We recommend that the second form be used as well to identify producers who are eligible for additional benefits and services and not labeled only for civil rights compliance. We further recommend that a category for veteran farmer and rancher be added to AD-2106, as well as for limited resource and beginning farmers and ranchers.

This information, voluntarily shared by the farmer or rancher that the USDA now has authority to collect, forms the basis of the ability of the agency to analyze increases in participation by underserved producers on the county level. The information can also be used to analyze services provided to underserved categories of producers as compared to other producers with respect to the newly mandatory USDA "Receipt for Service."

4. Language Access

A clear plan needs to be added to reach and include in the database producers with limited English proficiency and to reach out to all producers, particularly underserved producers, who stand to benefit as the new Farm Bill is implemented.

¹ <http://agriculture.einnews.com/article/203517660/98U0rIjmMD339Q91?n=1&code=tJtTUV5LnSWWjkaG>

5. Internal Use of the Data Collected

The Proposed Rule indicates that agencies should collect data on all program applicants and participants in conducted programs by county and State, including those for socially disadvantaged and limited resources applicants and participants.

It is our contention that USDA needs to do what is necessary and within reason to enable all producers to have quick and easy access to update their information maintained by USDA. Program resource allocation is critical to the USDA in light of recent field office closures and realignment. Accurate and up to date data collection is a tool that USDA needs to utilize to make the best use of present resources and to plan for future use of resources.

Moreover, USDA management can use this tool to measure the efficiency of internal processes, since Part B of form AD-2047 requires USDA personnel to compile information regarding which agency requested the update, the date of input, and supervisory signature of update completion.

6. Relationship to Access to Services at County Offices

Rural communities and farmers, especially socially disadvantaged farmers and communities, need consistency, fairness and equality in the access of services they receive from USDA and its employees. At a time when resources are short and FSA and related agencies are considering consolidation of county offices while a complex new farm bill is being implemented, we note that historically underserved and new entry producers will need more rather than less hands-on assistance.

Having up-to-date information on the actual population of producers and especially new entry and historically underserved producers, is also critical to help USDA agencies best assess where county offices are most needed both now and into the future.

Therefore, we urge Farm Service Agency, with related agencies as applicable, to use the data collected in the forms above:

- To conduct Civil Rights Impact Analysis, on customers and employees, prior to closing field offices;
- Maximize field resources to focus on outreach, education, loan making, and those services that require face-to-face contact with the farmers, ranchers, borrowers, and other customers;
- To conduct cost comparison analysis and to initiate insourcing projects to migrate work in support of the Rural Development and Farm Loan programs, including IT support, from expensive and profit-driven service contractors, who are being rewarded for poor quality work by getting more contract dollars to fix their work, to the most cost effective and quality federal workforce who are dedicated to the federal service and USDA's customers.

7. Receipt for Service

The Agency should work with its counterparts to immediately implement the mandatory Receipt for Service as authorized in the 2014 Farm Bill in order to capture this important data and get the most accurate picture on what this nation's diverse producers most need, what offices have achieved the

best success in serving them, what barriers may be occurring or where staff need to be better trained. The receipt for service is not only good for farmers but good for USDA as well because it provides data on the volume and importance of direct service at county offices by staff, and identifies the gaps in the offices before they become issues. We strongly recommend that this new tool be linked to the records of producers in order to best evaluate and document service needs.

We urge the agency to connect the SCIMS database to the implementation and use the “Receipt for Service” to provide tools that can be used in a proactive manner to underscore how what the agency serves the needs of a diverse and emerging agriculture sector.

We thank you for your attention to these recommendations.

Sincerely,

The Rural Coalition/Coalición Rural, Washington, DC

The National Latino Farmers and Ranchers Trade Association, Washington, DC

Black Farmers and Agriculturalists Association, Tillery, North Carolina Project

Concerned Citizens of Tillery, Tillery, North Carolina

Community Food and Justice Coalition, Oakland, California

Farmworker Association of Florida, Apopka, FL

Just Food, New York City, New York

National Alliance of Farmworker Women, Oxnard, CA

National Family Farm Coalition, Washington, D.C.

North Carolina Association of Black Lawyers Land Loss Prevention Project

Northwest Forest Worker Center, Albany, CA

Roots of Change, Oakland, CA

RRBG Farms LLC, Ariton, AL

Rural Advancement Fund, Orangeburg, SC

SOY (Service, Opportunities for You), Inglewood, CA

Texas Mexico Border Coalition San Isidro, TX

The **Rural Coalition**, an alliance of more than 70 rural community-based organizations representing African-American, American-Indian, Latino, Asian-American, Euro-American, and women farmers, farmworkers and rural communities in the US, works to ensure that organizations serving people of

color in the food system have the opportunity to develop and support their own initiatives to improve equity in food and farm policy. The Rural Coalition has successfully advocated for policies to increase transparency and accountability at USDA, promote just and sustainable development in rural areas; halt land and farm loss by eliminating the factors that cause it, and increase prosperity in the food system by expanding opportunities and access to agriculture programs for the nation's diverse farmers and farmworkers.