

Jackson-Lewis

FSA 31 Recommendations- Rapid Implementation

FSA-2 Institute training/seminars for FSA employees explaining why programs designed to increase SDG participation are essential, *i.e.*, the Business Case for Diversity, Inclusion and Accessibility, since the future of America competing in a global economy demands fairness for and inclusion of all Americans.

FSA-3 Take prompt remedial action to reinforce the severity of consequences associated with engaging in discriminatory conduct, where appropriate, and broadly inform local and national employees of the remedial actions taken (within the limits of privacy laws).

FSA-4 Working with the Offices of Advocacy and Outreach (—OAO||) and Communications,⁴ restore FSA's image with the public, particularly SDGs. As outlined in the Department-wide recommendations, FSA should specifically engage in the following:

- 1) Work with OAO to initiate a campaign to SDGs regarding FSA programs.
- 2) Myth/Rumor busting: FSA should develop a strategy for improved information flow to dispel key myths and rumors about FSA.

FSA-8 Cross-train employees on Farm Loan Programs and Farm Programs to better serve all customers and potential customers.

FSA-9 Cross-train field personnel regarding programs available through other USDA Agencies (RMA, RD, and NRCS) to better serve all USDA customers and potential customers.

FSA-11 Track and provide to State and County Office employees, on an annual basis, not only the statistics of the demographics of their counties and states, but the names and contact information of SDG customers and potential customers in their counties and states.

FSA-12 Whenever FSA officials deny SDG loan or program applications, they should be required to thoroughly explain to the applicants the reasons for denial *and* what the applicant can do to improve chances of securing FSA approval in subsequent applications. This includes referring them to the appropriate resources (such as a CBO that can assist in the process).

FSA-16 Have a fully cross-trained Farm Programs Technician or Farm Loan Officer or other cross-trained representative on staff in every County Office.

FSA-17 In areas where there is a critical mass of SDGs for whom English is a second language, to the maximum extent practicable, seek to have at least one fully cross-trained employee who is fluent in the language of that SDG group. Also, working with local resources, arrange for (for example, by referrals) more training of customers and potential customers in —English for business transactions.

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FSA-18 Create and make available forms that are translated into appropriate languages spoken by local FSA customers, not limited to Spanish, where there is a critical mass of any one individual SDG group in sufficient numbers to make the process cost efficient.

FSA-21 Simplify application forms and streamline the paperwork necessary to apply for Farm Loan Programs and Farm Programs, including eliminating requests for unnecessary and redundant information.

FSA-26 Return authority and responsibility to County Offices for mailing post cards and other information to FSA customers and potential customers.

FSA-29 Allow greater flexibility for borrowers to meet the 3-year experience requirement to be eligible for farm ownership loans (*i.e.*, allow college degree, –grew up on a farm,|| and past work on a farm, *etc.* to be used to satisfy 3-year requirement) and re-visit the value of a 3-year versus a 2-year requirement. Determine whether there is a compelling –justifiable business necessity|| for the rule, if not, modify the rule permanently to a lower justifiable number.

FSA-30 Eliminate the 1-year experience requirement for eligibility for Farm Loans for beginning farmers and establish other basic criteria more likely to serve as reasonable indicators of likely success, such as college degree, practical training, and experience.

FSA-31 Reduce the down payment requirement for guaranteed loans to beginning farmers.

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FSA-33 Issue a directive to every employee involved in the lending and/or outreach processes, clarifying what assistance they can and cannot provide to customers and potential customers in connection with completing their applications, to avoid unequal treatment that could be construed by any customer or potential customer as discriminatory.

FSA-34 Require employees who are unable to provide customers and potential customers with the level of service they require, beyond the scope of appropriate FSA Service, to refer customers to other Agencies, County Extension Service, or CBOs, that may be able to help.

FSA-35 Provide Farm Programs personnel with tools (including OMB approval, forms, computerized data collection methods, *etc.*) needed to accurately capture customer demographics, as is done by Farm Loan Programs.

FSA-36 Identify, develop, and fund improved, updated technology tools (office systems, telecommunications, *etc.*) in the State and County Offices.

FSA-37 Implement a national marketing campaign for Farm Programs, designed to increase FSA's visibility among producers similar to the marketing campaign developed by Farm Loans Programs.

FSA-38 Headquarters should collaborate and communicate better with the State and County Offices when conducting any event in that state and county.

FSA-39 Offer training for farmers/producers regarding web-based programs and applications and access to equipment for CBOs, libraries, and 1890 colleges.

FSA-40 Provide a dedicated computer terminal with internet access in each County Office dedicated, first, to those producers who have received Level 2 access and, second, to those who want to familiarize themselves with the website's contents and/or apply for program benefits.

FSA-41 Reorganize the contents of the website by type of farm, making it more user-friendly. For example, provide an icon for information concerning crops, an icon for cattle, nursery owners, *etc.*

FSA-42 Expand office hours in County Offices, especially during active seasons, so that they are more convenient for the schedules of farmers/ranchers.

FSA-43 FSA employees should be trained to communicate in plain language. They should understand they are not communicating with co-workers and should not use acronyms; rather, they should speak at a level that can be understood by farmers/ranchers who know little about FSA or its programs.

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FSA-44 FSA should create —train the trainer|| training programs for CBOs so that they can better train and explain FSA offerings to their constituents and assist in the application process.

FSA-45 FSA should develop pilot programs for farmers/ranchers who are not —credit ready|| and train CBOs or customers and potential customers on how to improve their credit.

FSA-46 For applicants who are prescreened for programs, but do not actually submit an application, obtain and retain demographic information.

FSA-48 If an applicant was delinquent on loan(s), but ultimately paid off the loan(s) in full, establish a time period after which FSA will not consider those delinquencies in making credit decisions.

FSA-49 Once appropriate and accurate record-keeping is maintained, annually analyze the relative application, acceptance/denial, payment, delinquency, and default rates of various groups of borrowers to determine whether any inappropriate discriminatory criteria are being used.