

County Committee Preservation Action Plan

In light of the Equity Commission's anticipated recommendation to eliminate FSA County Committees, this document presents a proactive plan to address this potential recommendation and garner support from the Agricultural Industry, grassroots partners, and key Congressional members of Congress to advocate against any effort to change or eliminate the FSA County Committee System or its authorities.

Based on conversations held during Equity Commission meetings throughout 2022, it is reasonable to expect that the Commission will soon release a significant number of recommendations to the Secretary that are designed to promote equity throughout USDA and the programs it administers. While we certainly support equity for all existing and potential FSA customers, we feel some of the Equity Commission's recommendations may be guided by misinformation related to FSA County Committees and the roles they play in FSA Program Administration. NASCOE is concerned that any recommendation to change or eliminate the County Committee System would negatively affect program oversight, implementation, and integrity. Any recommendation to this effect would likely impede Farm Service Agency Program equity by removing local knowledge and minority representation, both key aspects of the County Committee System and are designed to strengthen program delivery, fairness, and integrity. It should be noted that FSA Farmer-Elected County Committees have never held farm loan approval authority and only made basic eligibility determinations for farm loans during a short period of 3 years following the USDA reorganization in 1995. Farmers Home Administration appointed committees made eligibility determinations for FmHA farm loans prior to consolidation of FmHA and ASCS in 1994. Neither committee made loan feasibility determinations which are based on a producer's balance sheet, collateral and cash flow.

Elimination of the Farmer-Elected County Committee System would require Congressional action. The most likely scenario is that such legislation would be introduced and included in the 2023 Farm Bill. We anticipate discussions about the new Farm Bill will start in earnest this spring and kick into high gear during the summer and fall.

We know that ultimately, House and Senate Agriculture Committee members will determine if any language is included in the next Farm Bill that will change or eliminate the FSA County Committees. While these members have the final say, we recognize that commodity stakeholder groups will wield extensive influence on what the new Farm Bill looks like. Commodity groups will be extensively consulted about what they feel is needed to write strong program policy that will sufficiently support American farmers and the farm economy. It is our belief that most, if not all major commodity groups are very supportive of the FSA Farmer-Elected County Committee System.

Plan of Action – Phase 1

Beginning immediately, State Association Presidents should commit themselves, as well as their state association leadership team, to be educated on this action plan and the talking points provided by NASCOE. States are to work with their Area Executives on a plan to address the associations listed below and set up meetings with key individuals within these associations. State Presidents don't have to be the individuals actually making the contacts, but they need to spearhead the process, and ensure accountability, within their state. It is vital that we strive to have a majority of our state associations participate in this effort. The goal is to have many of the State Commodity Associations raising this concern with their National Association Leaders. Many Commodity Associations conduct their annual meetings January – March. Thus, the sooner these contacts are made the more effective this effort will be. Keep in mind, states are looking to meet with their state level association, not the national level one. For example, Kansas would meet with the Kansas Wheat Growers and the Kansas Farm Bureau, etc.

Identified Associations:

Agribusiness Association of Iowa
Agribusiness Council of Indiana
Agricultural Council of Arkansas
Agricultural Retailers Association
Amcot
American Cotton Producers
American Cotton Shippers Association
American Farm Bureau Federation
American Feed Industry Association
American Malting Barley Association
American Peanut Shellers Association
American Pulse Association
American Seed Trade Association
American Sheep Industry Association
American Soybean Association
American Sugar Alliance
American Sugar Cane League
Arkansas Rice
Arkansas Soybean Association
California Alfalfa and Forage Association
California Cattlemen's Association
California Cotton Ginner & Growers Association
California Grain and Feed Association
California Seed Association
California Walnut Commission
California Warehouse Association
Can Manufacturers Institute

Carolina Feed Industry Association
Colorado Association of Wheat Growers
Consumer Brands Association
Corn Refiners Association
Cotton Growers Warehouse Association
Cotton Warehouse Association of America
Cottonseed and Feed Association
Farm Credit Council
Florida Cattlemen's Association
Florida Feed Association
Grain and Feed Association of Illinois
Growth Energy
Hops Growers of America
International Fresh Produce Association
Iowa Renewable Fuels Association
Kansas Agribusiness Retailers Association
Kansas Grain and Feed Association
Kansas Livestock Association
Michigan Agri-Business Association
Michigan Bean Commission
Michigan Bean Shippers
Michigan Soft Drink Association
Minnesota Agri-Growth Council
Minnesota Crop Production Retailers
Minnesota Grain and Feed Association
Missouri Agribusiness Association
Montana Agricultural Business Association
Montana Feed Association
Montana Grain Elevator Association
Montana Grain Growers Association
National Association of Wheat Growers
National Barley Growers Association
National Cattlemen's Beef Association
National Corn Growers Association
National Cotton Council
National Cotton Ginners Association
National Cottonseed Products Association
National Council of Farmer Cooperatives
National Grain and Feed Association
National Grange
National Milk Producers Federation
National Oilseed Processors Association
National Onion Association
National Pecan Shellers Association

National Sorghum Producers
National Sunflower Association
Nebraska Agri-Business Association
Nebraska Cattlemen
Nebraska Dry Pea & Lentil Commission
Nebraska Wheat Board
Nebraska Wheat Growers Association
North American Equipment Dealers Association
North American Millers' Association
North American Renderers Association
North Carolina Agribusiness Council
North Dakota Agricultural Association
North Dakota Ethanol Producers Association
North Dakota Grain Dealers Association
North Dakota Grain Growers Association
North Dakota Wheat Commission
Northeast Agribusiness and Feed Alliance
Ohio AgriBusiness Association
Oklahoma Agribusiness Retailers Association
Oklahoma Grain & Feed Association
Oklahoma Sorghum Growers
Oklahoma Wheat Growers Association
Oregon Feed & Grain Association
Oregon Wheat Growers League
Pacific Northwest Grain & Feed Association
Peanut and Tree Nut Processors Association
Plains Cotton Growers, Inc.
Renewable Fuels Association
Rocky Mountain Agribusiness Association
South Dakota Agri-Business Association
Southeastern Grain & Feed Association
Southwest Council of Agribusiness
Tennessee Feed and Grain Association
Texas Ag Industries Association
Texas Agricultural Cooperative Council
Texas Cattle Feeders Association
Texas Corn Producers Association
Texas Grain and Feed Association
Texas Soybean Association
Texas Wheat Producers Association
The Fertilizer Institute
The Vinegar Institute
TN Feed & Grain Assn
US Canola Association

US Pea and Lentil Trade Association
U.S. Peanut Federation
US Rice Producers Association
USA Dry Pea and Lentil Council
USA Rice
Washington Association of Wheat Growers
Washington Grain Commission
Western Agricultural Processors Association
Western Growers
Western Peanut Growers Association
Wine Institute
Wisconsin Agri-Business Association
Wyoming Ag Business Association
Wyoming Wheat Marketing Commission

During these meetings, NASCOE representatives will make sure these associations are aware of the proposed Equity Commission recommendations; the benefits provided by administering federal farm programs through a grass roots approach; identify what the duties of the COC's are and what they are not; and ask that they support the FSA Farmer-Elected COC system by including within their Farm Bill talking points that the FSA County Committee System remain unchanged.

Plan of Action - Phase 2

Members of the NASCOE Executive and Legislative Teams met with NAFEC members at their meeting held January 4, 2023 in Lubbock, Texas to discuss this plan and the NASCOE COC Talking Points. We will partner with NAFEC in our grassroots approach so actual COC members can discuss their concerns personally with State and National Stakeholder Association Leaders and Congressional members to express the importance of County Committees. We feel that conversations held by County Committee members will have a significant impact and help create an urgency for these individuals to act aggressively to protect the FSA Farmer-Elected County Committee System. NASCOE intends to give NAFEC our full support to help them use their organization to rally support and engage their membership.

Plan of Action - Phase 3

House and Senate Agriculture Committee assignments should be completed in the coming weeks. Once all the committee members are identified, a list of these congressional members will be distributed to the Area Executives which will identify "targeted" members to approach. State Presidents or their members should take every opportunity to discuss the benefits of the FSA Farmer-Elected County Committee System with these "targeted" members of Congress according to the NASCOE talking points. A highlight in these discussions must be that the Farmer-Elected County Committees have never held farm loan approval authority and only made basic eligibility determinations during a short period of 3 years following the USDA

reorganization in 1995. The Farmer-Elected County Committee is the purest form of accountability in administration and oversight of federal programs.

In addition, the Legislative Team will also take every opportunity to speak with these same congressional members periodically when discussing Farm Bill matters. The NASCOE Legislative Committee must be diligent in monitoring draft language of the Farm Bill as it develops. In a Bill of this size, it would be easy for language of this nature to get buried in the text and overlooked. We recommend that the Legislative Team be authorized to travel to WDC to meet personally with these congressional members if deemed necessary by our Legislative Consultant.

Since this is an item that has impacts way beyond NASCOE's Legislative efforts, frequent updates to the NASCOE Executive Committee should be provided as developments occur.

Conclusion:

Although the Secretary of Agriculture has stated that "County Committees aren't going anywhere", we also know that SEDs were questioned recently about their thoughts on county committees having a reduced role as it relates to administrative duties. This should cause us all great concern. There has also been discussion on moving the selection process from a farmer-elected county committee to an appointed county committee. Regardless of the route taken, recordings of the Equity Commission hearings clearly reveal the end goal is to eliminate the FSA County Committee. Details will be outlined in the Equity Commission's recommendations when they are released. This concept is not a new one, but this time it may present its most serious threat yet. We must make sure our members, stakeholders, partners, and customers fully understand the threat we are facing. Elimination of the Farmer-Elected County Committee will mean the elimination of the FSA County Office System; a system that was originally established to ensure grass roots integrity and input at the local level. NASCOE's core existence is to represent county office employees. Our success at thwarting this effort depends on each of us. Each Area Executive, State President, Legislative and COAC team member and NASCOE Leader must do their part to engage to make sure this plan of action is followed and implemented to the best of our ability. NASCOE is committed to using every resource to ensure the Farmer-Elected County Committee and its authorities are not changed. Failure is not an option.