

PUBLIC SUBMISSION

As of: 6/1/26, 11:03 AM
Received: April 12, 2026
Status: Posted
Posted: April 13, 2026
Tracking No. mnv-yx0d-t3kf
Comments Due: June 01, 2026
Submission Type: Web

Docket: FSA-2026-0133
Information Collection Request; Direct Loan Servicing-Regular

Comment On: FSA-2026-0133-0001
Agency Information Collection Activities; Proposals, Submissions, and Approvals: Direct Loan Servicing-Regular

Document: FSA-2026-0133-0002
Comment on FR Doc # 2026-06409

Submitter Information

Name: Keshav Krishnan
Address:
Carmel, IN, 46032
Phone: 6506667012

General Comment

FSA direct loan servicing data captures farmer financial health. My research quantifies \$56-168 billion in stranded agricultural assets, and my graph neural network CasCrop (AUROC 0.94) can predict which counties will experience cascade failure next.

Three implications for FSA loan servicing:

First, loan restructuring in cascade counties differs systematically from stable areas. CasCrop can identify these regions proactively.

Second, the stranded asset phenomenon means collateral values backing FSA direct loans in cascade counties may be inflated. CasCrop's predictions could inform climate-adjusted collateral valuations.

Third, cascade dynamics accelerate nonlinearly. CasCrop's forward-looking predictions could trigger proactive outreach to borrowers before defaults occur — converting the information collection from reactive tracking to predictive risk management.

I recommend FSA pilot CasCrop-style predictive analytics alongside traditional information collection to identify at-risk loan portfolios geographically.

Respectfully submitted,
Keshav Krishnan