



March 2, 2026

Jenae Orso  
Desk Officer for Agriculture  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Washington, DC 20503  
Via regulations.gov

**Docket:** FSA-2025-0268

**RE: Information Collection Request; Organic Certification Cost Share Program**

Dear Ms. Orso:

Thank you for this opportunity to provide feedback to the USDA Farm Service Agency regarding revisions to currently approved information requests associated with the Organic Certification Cost Share Program (OCCSP). The Organic Trade Association (OTA) is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States. Our members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, brands, retailers, material input providers, and others. OTA's mission is to grow and protect organic with a unifying voice that serves and engages its diverse members from farm to marketplace.

OTA strongly supports the OCCSP as a tool to expand organic production and provide increased market opportunities for U.S. producers. We appreciate the continued funding of the program in the One Big Beautiful Bill at a level of \$10 million through 2031. This funding is especially vital to businesses new to organic production, as well as small or emerging businesses for which certification fees would otherwise present a financial hurdle to entry into the organic market.

Certified operations and state departments of agriculture are best able to respond to questions seeking feedback specific to estimated burdens when submitting required information. However, in response to feedback we have heard from our membership and the organic community, we suggest considering the following potential changes to increase efficiency and participation in the OCCSP. Some of these suggestions are highlighted by Oregon Tilth, an organic certification, education, and advocacy organization, in its white paper [Policy Recommendations for the Organic Certification Cost Share Program](#).

### **Open Cost Share Reimbursement Administration to Certification Agencies**

Presently, the OCCSP is administered either by a state department of agriculture in partnership with FSA or directly by FSA. When applying for cost share reimbursement to either, operations must complete the cost share application, provide invoices from the certifier showing all eligible fees as “paid,” and submit



a W-9 and their organic certificate. Because invoices must come from the certifier, this creates an extra step and occasional back-and-forth with FSA when invoices are submitted not marked as paid. Additionally, some organic operations do not have an existing relationship with FSA, whereas they do with their organic certifier.

Because the organic certifier has a record of eligible fees paid, is already subject to USDA oversight through AMS and because it has an existing relationship and frequent communication with the potential OCCSP applicants, OTA suggests FSA consider partnering with certifiers to more directly administer the program. This could be done by FSA granting a certifier full administrative oversight, as it currently does with state departments of agriculture. Moving to such a relationship may increase efficiencies for both FSA and the certifier, as well as increase participation in the program.

### **Issue Cost Share Funds as a Credit vs. a Reimbursement**

OCCSP funding is widely appreciated by operations for which certification fees may present a barrier to entry into organic production. Reimbursement of fees puts dollars back into an operation's budget to focus on production, equipment, and marketing costs. However, OTA has heard from stakeholders that receiving funds as a credit vs. a reimbursement can create a burden for those operations running on tighter margins or for those just getting started.

If FSA were to allow certifiers to distribute OCCSP dollars directly, funds could be disbursed at the time of certification application or renewal. This process has been successfully modeled by the Washington State Department of Agriculture Organic Program, which enjoys a high OCCSP participation rate.

On behalf of our members across the supply chain and the country, OTA thanks you for the opportunity to comment, and for considering these opportunities for efficiency and participation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott Rice", is positioned above the typed name.

Scott Rice  
Sr. Director, Regulatory Affairs  
Organic Trade Association

cc: Tom Chapman  
Co-CEO  
Organic Trade Association