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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Guaranteed Farm Loan Program

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Submitter Information

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General Comment

1) Inconsistent Interpretation Across FSA Offices - Standardize guidance and enforcement or allow each PLP lender to work with ONE FSA office.
2) Let us integrate or upload data instead of re-keying it. (i.e. Semi-annual status reports)
3) Streamline or consolidate forms — cut what's redundant.
4) Back-and-forth with FSA adds time - Update burden estimates to reflect reality.
5) Reduce reporting frequency or automate it.
6) Focus on material risk

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We strongly support the Guaranteed Farm Loan Program and its role in expanding access to credit for agricultural producers. Our comments are focused on improving the efficiency, consistency, and usability of the associated information collection processes.

1. Reduce Duplicate Data Entry
Currently, lenders are required to input substantially similar borrower and loan data into both internal loan origination systems and FSA forms. This duplication increases the risk of errors and adds unnecessary administrative burden. We encourage FSA to explore options for system integration, standardized data uploads, or API-based solutions to reduce manual re-entry.

2. Streamline and Consolidate Forms
The volume and complexity of required forms across origination and servicing create operational inefficiencies. We recommend a comprehensive review to eliminate redundant fields and consolidate overlapping forms where possible. Simplified documentation would improve processing times and reduce

training burdens for lending staff.

3. Reassess Burden Estimates
The current estimated time required to complete information collection activities does not fully reflect real-world conditions, particularly for complex credits or servicing actions. We recommend that FSA engage directly with participating lenders to develop more accurate burden estimates that account for documentation gathering, internal review, and FSA follow-up.

4. Modernize Submission and Reporting Processes
We encourage continued investment in digital tools that enable secure, standardized submission of required information. Expanding electronic workflows would improve timeliness, reduce errors, and better align with modern lending practices.

5. Ensure Consistent Interpretation and Application
Variability in documentation expectations and interpretation across FSA offices can lead to delays and rework. Clear, standardized guidance and training would improve consistency and predictability for lenders and borrowers alike.

6. Align Compliance Requirements with Material Risk
We encourage FSA to ensure that minor or technical documentation deficiencies do not disproportionately impact the enforceability of the federal guarantee. A risk-based approach would better support program participation while maintaining appropriate safeguards.

We appreciate USDA's continued partnership with lenders and its willingness to consider stakeholder feedback. We would welcome the opportunity to engage further on these topics.