FARM CREDIT COUNCIL

June 29, 2026

Bill Beam
Administrator, USDA Farm Service Agency
1400 Independence Ave, SW
Washington, DC, 20250-0506

Re: Response to Notice - Information Collection Requests; Guaranteed Farm Loan Program, 91 FR 22788 (April 28, 2026), Docket No: FSA-2026-0265

Dear Administrator Beam,

On behalf of Farm Credit System ("FCS") banks and associations, Farm Credit Council ("FCC") appreciates the opportunity to comment on the Farm Service Agency's ("FSA") information collection request concerning "Guaranteed Farm Loan Program," published in the *Federal Register* on April 28, 2026. *See 91 FR 22788*.

FCC is the national trade association for the Farm Credit System, a nationwide network of customer-owned financial institutions with a specific mission to support rural communities and agriculture ("Farm Credit institutions").

FCC has an active and established FSA Workgroup ("Workgroup") of lenders from across the country, who routinely work with their local FSA offices to support the needs of U.S. farmers and ranchers. This group of lending experts provides analysis and advice on issues related to FSA loans to FCC and helped to develop this comment. A draft comment letter was circulated to all Workgroup members for review prior to submitting this letter to FSA. This final letter represents the results of the Workgroup's efforts.

Farm Credit appreciates the opportunity to work collaboratively with FSA to identify practical solutions that improve program delivery, strengthen customer service, and reduce unnecessary burdens on borrowers, lenders, and agency staff while maintaining the integrity of the Guaranteed Farm Loan Program.

Summary

The FCS is one of the largest lenders serving U.S. agriculture and values its longstanding partnership with FSA. FSA's Guaranteed Farm Loan Program plays a critical role in expanding access to credit for agricultural producers, and most FCS associations participate as Preferred Lenders under the Preferred Lender Program (PLP). As FSA continues to modernize program delivery, we encourage the agency to further leverage the expertise, technology and capabilities of commercial lenders by expanding opportunities for lenders to support application processing, documentation review and verification activities.

We appreciate FSA's efforts in advancing technology and its ongoing commitment to modernization. At the same time, significant opportunities remain to further enhance technology systems, simplify and

clarify program guidance and requirements, and promote greater consistency in communication and implementation across state and county offices.

Improvements in these areas can reduce administrative burdens, increase operational efficiency, and enhance customer experience while maintaining program integrity. They can also help alleviate resource constraints on FSA staff and strengthen the agency's ability to serve agricultural producers, particularly young, beginning and small farmers and ranchers who continue to rely on FSA programs and assistance.

Strengthening the Public–Private Partnership

We believe that the success of the PLP model is rooted in a longstanding partnership between FSA and commercial lenders, built on mutual trust, accountability, and a shared commitment to ensuring agricultural producers have access to the financing needed to support the long-term viability of their operations. The Preferred Lender Program was intended for lenders with a proven track record of success to more easily partner with FSA and better serve U.S. farmers and ranchers. Despite the program's initial effectiveness, however, over time the benefits of the program have eroded due to increased burdens being placed once again on the PLP partner and the customers they are trying to support. We believe the PLP lenders should once again have delegated authority to ensure the timeliness of the program, while ensuring the integrity of the program as well.

As all industry partners work to keep pace with rapid technological advancement, it is critical to consider how the respective strengths of the public and private sectors can be leveraged most effectively. Given the private sector's ability to adopt innovative tools and develop specialized lending expertise, FSA should continue exploring ways to expand the role of participating lenders in the loan making and guarantee processes. Such efforts could reduce administrative burdens, improve processing efficiency, enhance customer experience, and support the long-term effectiveness of the Guaranteed Farm Loan Program. These programs are particularly important for young, beginning and small producers who often face barriers to accessing capital and rely on FSA programs as a pathway to establishing and growing their operations.

To better support our customers, we recommend allowing PLP lenders to:

- **Streamline loan administration and servicing processes.** FSA could identify opportunities to collect necessary information upfront and reduce duplicative reviews throughout the life of the loan. Allowing FSA to rely on a lender's credit analysis and approval processes for routine servicing actions could streamline administration, reduce processing times, and improve borrower outcomes.

- **Align reporting requirements with lender processes.** FSA could review reporting deadlines and requirements to better align with lenders' existing review, monitoring, and reporting cycles. Greater alignment would reduce administrative burden, minimize duplicative reporting, and improve compliance while maintaining appropriate program oversight.

- **Make the FSA Guarantee application editable post application and provide visible timelines for completion**. Currently, when applications are submitted, commercial lenders often have no timeline for when the applications will be looked at or what is needed. Generally, FSA does not include the FCS loan officer in communication unless it is initiated by the customer.

- **Under the automated joint financing component of FSA loan programs, permit PLP+ lenders to perform all due diligence and underwriting activities.** This encompasses

conducting all credit analysis, underwriting, and due diligence, while providing FSA with a concise one-page financial summary for recordkeeping purposes.

- **Determine borrower creditworthiness** using standard commercial lending credit analysis, underwriting methodologies, and/or approved scorecard models and provide a concise one-page financial summary for both customer use and FSA recordkeeping.

Streamlining and Modernizing Information Collection Operations

Commercial lenders are well positioned to assess the financial strength, creditworthiness and repayment capacity of applicants and can play a greater role in supporting documentation review and eligibility verification. As FSA continues its modernization efforts, the agency should seek opportunities to streamline information collection requirements by removing duplicative requests, leveraging lender expertise, and existing underwriting processes. Information requests should be focused on what is necessary to support sound credit analysis, program eligibility, collateral protection and ongoing servicing oversight.

In many cases, lenders already collect and review substantial documentation as part of their normal underwriting and servicing activities. Rather than requiring the submission of extensive supporting materials to FSA, lenders could be permitted to certify or attest that required documents have been obtained, reviewed and maintained in their files. This approach would reduce administrative burden for borrowers, lenders and agency staff while maintaining program integrity and appropriate oversight.

Areas for streamlining could include:

- **Establish a centralized document repository.** Create a single online location for all program documentation, forms, guidance materials, and training resources, supported by a robust search function and real-time application status tracking. Providing borrowers and lenders with visibility into where a loan application stands in the process would improve transparency, reduce uncertainty, and limit unnecessary follow-up communications.
- **Focus documentation requirements on material information.** Prioritize collection of information that is directly relevant to credit underwriting, eligibility determinations, collateral adequacy and servicing oversight. Avoid duplicative requests when the same information is already available through lender credit files or prior submissions.
- **Align reporting requirements with risk.** Tailor documentation and reporting requirements to the size, complexity and risk profile of the loan. Standard, well-performing loans should be subject to a lighter administrative burden than higher-risk, distressed or exception-based transactions.
- **Simplify and modernize application processes**. Standardize forms and documentation requirements, reduce repetitive submissions, expand acceptance of lender-prepared documents, and increase the use of secure digital submission, workflow management and application status tracking tools.
- **Expand the use of lender certifications and attestations.** Allow lenders to certify that required documents have been obtained, reviewed and maintained in their files rather than requiring submission of extensive supporting materials to FSA.

Practical Implementation and Transition Management

Consistency in program administration across county and state offices remains critically important. While FSA operates under uniform rules and regulations, FCS institutions often observe differences in

communication, documentation requirements, and implementation approaches across state and county offices. These variations can create confusion among parties that are all working in good faith and may result in delays for customers seeking access to credit, especially for those that are time sensitive. Greater consistency in program guidance, training and policy interpretation would reduce administrative burden, streamline operations for lenders, borrowers and FSA staff, and help ensure equitable program delivery nationwide.

Examples include:

- **Provide clear implementation guidance and transition periods.** Ensure lenders have sufficient time to update systems, train staff, and modify operational procedures when new policies, technologies or reporting requirements are introduced.
- **Promote consistent program administration across county and state offices.** Strengthen training, communication, and policy interpretation to reduce variations in program implementation and create a more predictable experience for lenders and borrowers.
    - We appreciate past national joint training efforts and encourage USDA to continue them.
    - We also commend state and local offices that conduct joint trainings and meetings with lending and agricultural associations and encourage broader adoption of these collaborative practices to strengthen consistency, communication, and program delivery.

Accountability and Program Integrity

We believe the PLP designation should continue to represent an earned status that reflects demonstrated expertise, strong program knowledge, and consistent performance. A "trust but verify" framework remains an effective and efficient model for administering guaranteed lending programs, particularly when paired with clear expectations and consistent application of program requirements across all levels of FSA administration.

Conclusion

Farm Credit strongly supports FSA's efforts to strengthen and modernize its guaranteed lending programs, which play a critical role in supporting farmers, ranchers, and rural communities across the country. We appreciate the agency's ongoing engagement with stakeholders and its commitment to improving program delivery.

As FSA advances these efforts, we recommend exploring opportunities to expand the role of PLP lenders in the loan-making and guarantee processes, leveraging their expertise and capacity to improve efficiency and customer service. At the same time, continued investment in technology, automation, and data integration will be essential to improving processing efficiency, enhancing accuracy, and allowing agency staff to focus on more complex eligibility determinations and exceptions.

Equally important is the consistent interpretation and application of program requirements across state and county offices. Greater uniformity in guidance, training, communication, and implementation would reduce administrative burdens, promote compliance, and provide lenders and borrowers with a more predictable and transparent operating environment.

Farm Credit stands ready to work collaboratively with FSA to identify practical solutions that improve program delivery, strengthen customer service, and reduce unnecessary burdens on borrowers, lenders, and agency staff while maintaining the integrity of the Guaranteed Farm Loan Program.

We appreciate the opportunity to provide input and look forward to continued engagement with USDA.

Please do not hesitate to contact me if FCC may be of further assistance.

Sincerely,



Robert Paul Boone, III
Senior Vice President of Regulatory Affairs & General Counsel
Farm Credit Council