

# PUBLIC SUBMISSION

<b>As of:</b> 4/13/26, 1:56 PM
<b>Received:</b> April 08, 2026
<b>Status:</b> Posted
<b>Posted:</b> April 08, 2026
<b>Tracking No.</b> mnq-iat5-7w95
<b>Comments Due:</b> April 13, 2026
<b>Submission Type:</b> API

**Docket:** NRCS-2025-0236

Information Collection Request; Advancing Markets for Producers

**Comment On:** NRCS-2025-0236-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Advancing Markets for Producers (Formerly Partnerships for Climate-Smart Commodities)

**Document:** NRCS-2025-0236-0003

Comment on FR Doc # 2026-02625

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## General Comment

We appreciate the opportunity to comment on the information collection request for the Advancing Markets for Producers (AMP) initiative. See attachment for greater detail. At this time, reporting requirements remain unclear and continue to evolve across awardees. There is still uncertainty regarding when the Detailed Project Reporting (DPR) workbook will be finalized, even as some projects are expected to submit reports before the final workbook has been made public. While a summary of changes to the DPR has been circulated, many recipients still do not know which data elements are required versus optional or which are most useful for USDA decision-making. This challenge has been compounded by the restructuring from PCSC to AMP, which forced many projects to reduce partners and staffing dedicated to data collection, MMRV, outreach, training, and technical assistance. In practice, many AMP projects have shifted away from conservation practice incentives and toward a model that more closely resembles conditional cash transfers and market-based producer investments. Current guidance reinforces that non-NRCS practices or activities, such as marketing incentives, are exempt from environmental evaluation requirements, while conservation-related operations still require CPA-52 and, where applicable, CPC-10 review. As a result, reporting requirements should better reflect the current operational reality of AMP rather than assume that all projects are still centered on conservation implementation and greenhouse gas outcomes.

To improve efficiency and reduce burden, USDA should clearly distinguish required versus optional data elements, consolidate repetitive reporting fields across producer, farm, and field tabs in the DPR, and align reporting expectations with the current structure of AMP. The present burden is difficult to estimate because it is shaped not only by evolving templates and inconsistent communication, but also by delays tied to state-level environmental and cultural review approvals. Semi-annual reporting is more reasonable and less burdensome than quarterly reporting, especially for projects serving thousands of small producers with limited recordkeeping capacity. USDA should also consider a centralized reporting platform, similar to the Foreign Agricultural Service's Food for Progress program Food Aid Information System (FAIS), to

replace the need for multiple templates and narrative reports. Most importantly, USDA should prioritize the data elements that are most useful for oversight, such as producer participation, financial assistance delivered, and market-related outcomes, while reducing or eliminating greenhouse gas, offsets, and insets reporting requirements that no longer align with the program's current direction or the reduced technical capacity of many awardees.

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## **Attachments**

Response - Public Information Comment Request - AMP