

# PUBLIC SUBMISSION

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**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)

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## Submitter Information

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## General Comment

We appreciate the opportunity to provide feedback on the proposed revision of the information collection request for the Advancing Markets for Producers (AMP) initiative. We focus our feedback on key areas where clarification and alignment of reporting elements to AMP initiative objectives would improve implementation by awardees.

Reporting requirements should better reflect the priorities and objectives of the AMP initiative and simplify reporting burden for Producers. As of 13 April 2026, only the timing of performance reporting has been specified for AMP grant awardees. None of the specific elements that will be required to be included in semi-annual performance reporting have been shared by USDA with awardees. There remains uncertainty when the Detailed Project Reporting workbook (DPR) will be finalized. AMP awardees have not been able to communicate expectations to enrolled Producers and Producers considering enrollment. With the required restructuring of grant funds out of indirect and other capacity-oriented categories as part of the required budget realignment from the former Partnerships for Climate-Smart Commodities (PCSC) to the AMP initiative, awardees no longer have the capacity to support complex reporting requirements that are not aligned with the objectives of the AMP initiative. Grant awardees are unable to provide feedback on the USDA estimates of total annual administrative burden at this time, as the specific data elements and detailed requirements of the semi-annual reporting for AMP have not been communicated to awardees.

To improve efficiency and reduce burden on participating producers, we recommend the USDA take several actions;

1. USDA should distinguish required versus operational data elements. This way AMP awardees may effectively communicate data requirements to enrolled and interested Producers.
2. Detailed Project Report (DPR) structure should be consolidated to reduce duplication across multiple tabs

3. Align AMP Initiative reporting expectations with initiative's focus by eliminating GHG-related reporting requirements that no longer match the required structure of AMP awardee programs
4. Prioritize a smaller set of reporting elements that are most useful for USDA oversight and program management. This may include producer participation, financial assistance delivered, and basic implementation metrics

The previous reporting framework used for the former PCSC program does not reflect the current focus and priorities of the AMP initiative and should be adjusted to simplify reporting expectations and better align requirements of awardees and producers with the AMP initiative.

Thank you for the opportunity to provide feedback and recommendations. We appreciate USDA's consideration of these comments and the opportunity to support development of a reporting framework that is clear, impactful, and aligned with the current structure and focus of the AMP initiative.

Respectfully submitted,  
Victoria Lockhart

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## **Attachments**

AMP Reporting Comments\_TheClimateTrust\_13Apr2026