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Socially Disadvantaged Farmer Issues can be Addressed When Diverse Frontline Agricultural Workers Proactively Work Together

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SOCIALLY DISADVANTAGED FARMER ISSUES CAN BE ADDRESSED WHEN DIVERSE FRONTLINE AGRICULTURAL WORKERS PROACTIVELY WORK TOGETHER

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Abstract

This paper focuses on socially disadvantaged farmers (SDFs) and civil rights issues as it relates to the USDA. It also deals with Diversity Initiatives in the 2008 Farm Bill, and discusses an assessment by Jackson Lewis LLC of the USDA's efforts to deal with the diversity initiatives. Redacted USDA case studies examined at the 2010 Professional Agricultural Workers Conference at Tuskegee University are presented. The findings revealed that at that time the 2008 Farm Bill Initiatives were not effectively being implemented. It was recommended that the USDA should: keep making the effort to reform or improve its civil rights practices; be more customer-oriented; follow-up on clients; be transparent; and continue using 1890s, community-based organizations, and other outreach entities to reach SDFs.

Keywords: Socially Disadvantaged Farmer, USDA, Civil Rights

Introduction

Socially disadvantaged farmer (SDF) has become the politically correct term for "underserved, minority farmer" whose chances of receiving USDA services have historically been low. In an effort to right the wrongs of its past, USDA implemented several Diversity Initiatives in the 2008 Farm Bill. Four discrimination class action suits via Pigford (Black farmers), Keepseagle (Native American farmers), Garcia (Latino farmers) and Love (Women farmers) were required to initiate this effort (Pigford v. Glickman, 1999; Keepseagle v. Venaman, 2001; Garcia v. Vilsack, 2010; Love v. Johanns, 2006). Black farmers were the first to file suit against the USDA in 1997. Although the present Diversity Initiatives initiated via the 2008 Farm Bill are a start, it is not the federal government's first attempt to create race-based land and agricultural programs to correct America's racial indiscretions of the past. The establishment of the Indian reservation system in the 1830s and the Forty acres and a mule program during Reconstruction can be perceived as some beginning "efforts to correct injustices associated with land ownership, agriculture and race/ethnicity" (Indian Appropriations Act, 1851; Public Broadcasting Service, 2003).

The rate of SDF land ownership has declined significantly through the years. For example, in 1920 Blacks owned roughly 15 million acres of land; however, by 1997 only two million acres remained in Black ownership (Merem, 2006). The rate of Black land loss estimated at 30,000 acres per month, in the 1990s became an impetus for the 1997 filing of Pigford v. Glickman, which originally consisted of 641 claimants. In 1998, Brewington v. Glickman (Brewington v. Glickman, 1998) was filed and later consolidated into Pigford. Due to a July, 1998 cut-off date to gain class membership, it is estimated that over 74,000 farmers were excluded which led to the Pigford II settlement which was recently finalized on October 28,

2011. The Black farmers received a settlement of $2.5 Billion. Other class actions followed; Keepseagle in 1999, Garcia and Love in 2000. Garcia and Love are still pending as a joint settlement agreement. Keepseagle settled for $760 million in April 2011.

This article focuses on the 2008 diversity initiatives within the Farm Service Agency (FSA), Rural Development (RD) and the Natural Resources Conservation Service (NRCS). Results and implications of the Civil Rights Action Team (CRAT) report, a description of Diversity Initiatives, and a summary of USDA's efforts in implementing corrective initiatives (Jackson Lewis Report) are presented. A compilation and assessment of redacted case studies by diverse frontline professional agricultural workers presented at the 2010 Professional Agricultural Workers Conference (PAWC) is rendered as a first-hand account of how the 2008 diversity program policies that are facially neutral, do not manifest justice as expected by those being served.

CRAT Report

In 1983 the Civil Rights office was closed leaving thousands of discrimination complaints in boxes. Nearly 15 years passed without any response; however, former Secretary Daniel Glickman in 1997 ordered an internal investigation, and the reopening of the Civil Rights Office. Recognizing the need for change, Secretary Glickman established CRAT in an effort to change the Department's civil rights practices. In fact, even before CRAT, issues regarding discrimination and exclusion, or nonparticipation, had been documented in numerous other reports dating as far back as 1965. Some of these documented cases are listed in the final CRAT report as (CRAT, 1997):

- In 1965, the US Commission on Civil Rights documented discrimination against minority employees and in program delivery;
- In 1970, the USDA Employee Focus Group Report found issues of civil rights were inept to serious consideration; additionally, "cronyism and nepotism were frequent factors in making personnel and management decisions";
- In 1982, the US Civil Rights Commission once again concluded that the Farmers Home Association (now FSA), instead of addressing the racial barriers facing Black farmers, sustained a work environment to maintain discriminatory practices;
- In 1990, the Congressional Committee on Government Operations "identified Farmers Home Administration as one of the key causes of the drastic decline in Black farm ownership;"
- In 1993, in an external audit commissioned by the Foreign Agricultural Services (FAS) agency, the report found many managers perceive diversity initiatives as burdensome. Numerous attempts to hire a more diverse staff were unsupported;
- In 1995, the Government of Accountability Office (GAO) held that USDA management is not being required or penalized for enforcing the Equal Employment Opportunity Commission (EEOC) regulations; and
- In 1996, D.J. Miller Report concluded minorities and women were less likely to engage in the appeals process regarding a discrimination complaint because of the cumbersome process, intimidation and unfamiliarity with policy/procedure.

The CRAT team audited over three decades of correspondence and held 12 listening sessions across the country. SDFs and minority employees voiced their frustrations. The Final report issued 92 recommendations, in February 1997. According to the CRAT report, a 1996 internal study found less than one percent of USDA's budget was allocated towards civil rights. Further, the Farm and Agricultural Services (FFAS) Agency, which manages oversight over FSA program delivery was mediocre. The report found that too many decisions were made based on outside influences, i.e., lobbying groups, especially Agency Administrators who were appointed by Congress and not the President, unlike the Secretary of Agriculture. Additionally, the county level of governance, which had the most interaction with farmers, was primarily run by non-USDA employees appointed by an elected FSA County Committee. The Committee had been delegated to hire and terminate the County Executive Director. The County Executive Director was responsible for hiring and supervising the county staff. The County staff was responsible for program administration and management. Due to the non-USDA status, most members of county staff were not required to adhere to "so-called" USDA civil rights standards, but were paid from federal funds filtered through FSA.

Some of the recommendations included:

- The development of performance based evaluation for Senior level staff contingent upon meeting civil rights objectives;
- Adopt and enforce a policy that the Department would take the appropriate adverse or disciplinary action against any manager found guilty of reprisal against any USDA employee or customer;
- Streamline procedures to allow agencies to enforce disciplinary action for civil rights violations;
- The Secretary should work with the President and Congress to change the personnel selection process;
- Reform the County Committee election system, i.e., restricting the members' authority;
- Convert all non-federal FSA employees to federal employees;
- Appoint minority members in under-served areas to State Committees;
- Appoint an independent review body in each state to conduct reviews;
- Streamline the loan application process;
- Require independent review of all pending foreclosures to determine if discrimination has contributed to the process;
- Create a more simple paperwork process for filing a discrimination complaint;
- Establish and empower a Special Task Force to determine a process for providing remediation to farmers who have been discriminated against;
- Change the eligibility requirements for direct loan programs to allow applicants to show proof of income and to pay rent without the requirement of credit history;
- Appoint a diverse commission to develop a national policy on small farms;
- Establish an Office of Outreach to improve program delivery across the board;
- Establish in each agency an outreach liaison position;
- Establish a State and National Outreach Council to ensure efforts are being met and to establish partnerships with Community-Based Organizations (CBOs) and land-grant institutions;
- Require land-grant institutions to identify research needs that will service minority farmers and increase funding for efforts;

- Expand the use of cooperative research agreements with (Historically Black Universities and Colleges (HBCUs);
- Provide annual funding of $10 million for SDF programs;
- Fully fund $85 million for loan ownership and $500 million for operating loan programs;
- Establish service centers within high concentration areas of SDFs, i.e., tribal lands;
- Improve the civil rights training of FSA personnel;
- Improve working conditions for farm workers;
- Develop goals for increasing purchasing and contracting of goods and services with minority owned businesses;
- Hold all managers accountable for considering a diverse pool of applicants; and
- Establish a new Civil Rights Office that handles employee and program complaints.

According to the USDA within a span of ten months the Department had implemented 85 of the 92 recommendations. Specifically, it achieved the following in 1997 (Annual Report of the Secretary, 1997):

- Restaffed the civil rights enforcement unit and began work on the backlog of discrimination complaints--resolving 187 program discrimination complaints, including 11 major settlements;
- Initiated new foreclosure and lending policies at USDA to help assure that no one will lose his or her farm because of discrimination;
- Provided direct operating loans totaling $65 million to 1,927 SDFs and direct farm ownership loans totaling $15.5 million to 184 socially disadvantaged farmers, exceeding by 176% the targeted allocation that Congress had set;
- Increased minority representation on Farm Service Agency (FSA) State committees by 10% over the past year - 46% of the 222 FSA State committee members were women and minorities;
- Established an Office of Outreach to reach customers that USDA has not traditionally served;
- Provided $4.5 million from the Fund for Rural America for outreach to socially disadvantaged farmers;
- Created the Small Farms Commission to address the critical needs of small and SDFs;
- Increased direct farm ownership and farm operating loans made to minority and women farmers from $46.5 million to $81 million (a 74% increase), between FY 1993 and FY 1997;
- Established the new division of civil rights in the Office of the General Counsel. This office is charged with providing legal counsel and guidance to the Department on civil rights issues; and
- Hosted two procurement conferences targeting American Indian and Alaska Native Corporations, resulting in an increase in contract awards to American Indian firms.

2008 Diversity Initiatives

The 1997 initiatives that were implemented as a result of the CRAT report led to the "Beginning and Socially Disadvantaged Farmer and Rancher Contract Land Sales" pilot program in the 2002 Farm Bill (Farm Bill, 2002). The program was designed to encourage the sale of land from retiring farmers to beginning and SDFs. This program and others were turned into a permanent program in the 2008 Farm Bill. In 2008, $1.5 billion were allocated to diversity initiatives, which included the following (Farm Bill, 2008):

- Section 2501 Program which provides grants to institutions and organizations that work with SDFs to assist in acquiring, owning, operating and retaining farms and ranches. The Office of Outreach and Advocacy administers the $75 million program;
- Beginning Farm and Rancher Development Program, is a grant program that funds education, extension and technical assistance to SDFs. The program is administered by USDA's National Institute of Food and Agriculture, 25% of program budget goes to SDF efforts;
- Value-Added Producer Grant program, receives $20 million in annual funding to help establish value-added producer-owned businesses, that are SDF focused;
- Five percent of the Environmental Quality Incentive Program (EQIP) and the Conservation Stewardship Program (CSP) funding were allocated to SDFs. EQIP provides SDFs with a 90% cost share rate and 30% advanced bonuses to cover upfront costs of materials and contracting. CSP guarantees a minimum $1,000 payment if the contract payment is less than that amount;
- Conservation Reserve Program (CRP) provides an extra two years of CRP rental payments to owners who are currently in CRP and transitioning back into production if they rent or sell their land to an SDF;
- Conservation Loan Program gives priority to SDFs who need loan assistance to cover the expenses associated with implementing conservation practices;
- Placed a moratorium on foreclosures and loan accelerations if discrimination was involved; offered more credit services to minority and first time farmers at lower interest rates and loans for down-payments. Some incentives include allowing SDFs the right to purchase foreclosed government property initially when placed on the market within the first 135 days. Better lending terms on FSA loans were specifically extended to Native Americans under the 2004 Indian Land Consolidation Act; and
- Mandatory funding of $224 million was allocated over a five-year period to provide block grants to assist SDFs sign up for benefits. States must develop and submit an outreach plan for SDFs to USDA in order to gain program participation.

Some of these initiatives were already written into program agendas prior to 2008 under the "Socially Disadvantaged and Beginning Farmers" Program. Several of these incentives were not new but existing programs had not been effectively implemented.

Jackson Lewis Report

The USDA assessed the Risk Management Agency (RMA), FSA, RD and NRCS current working relationships with SDFs and program implementation as well as the 2008 Farm Bill Diversity Initiatives (Jackson Lewis, 2011). USDA's ultimate goal of independent assessment was to determine the effectiveness of the diversity initiatives in analyzing program law, policies and procedures; current customer base compared to existing population disparities; evaluation of current outreach efforts; and review of cultural distinctions. The following 15 states' program performance was evaluated: Arizona, California, Florida, Georgia, Louisiana, Michigan, Mississippi, New Mexico, North Dakota, North Carolina, Oklahoma, Pennsylvania, South Carolina, Vermont and Washington. The contract to complete the assessment and compile recommendations was awarded to Jackson Lewis LLP Diversity Consulting Group. The assessment consisted of four phases (Jackson Lewis, 2011):

- Phase I: Initial Orientation and Planning
- Phase II: Field Assessment
- Phase III: Data Validation and Analysis
- Phase IV: Recommendations

Interviews of headquarters, regional, state, county and local USDA personnel were conducted within all four agencies in each state. Over 1,750 interviews were conducted between January, 2010 and March, 2011. Applicant insight was gathered during 30 focus group sessions within 10 of the 15 assessment states. Unfortunately, due to low attendance and interest, this effort was supplemented by interviewing 30 Community-Based Organizations (CBOs). Also, due to extensive delays, submission of erroneous information on the part of the USDA, the process to complete the assessment and its effectiveness was compromised according to Jackson Lewis. Overall, Jackson Lewis concluded that the USDA needed to implement total programmatic changes in order to meet their statutory and internal goals of escaping its discriminatory stigma. Some suggested changes included: aggressive in-person training modules for personnel to provide better outreach and customer service; performance plan and oversight requirements for personnel to ensure diversity goals, otherwise, compensation and promotion potential would be effected; implementation of public reporting initiatives to Congress outlined in the diversity initiatives to ensure public accountability; requirement of annual business plans with measurable goals, deadlines, evaluations and end-of-year goals; re-organization of the complaint process to make it more streamlined; and creation of an Under Secretary of Diversity position along with a Diversity officer within every agency. An analysis of FSA, RD and NRCS assessments are described more thoroughly below.

FSA Assessment

FSA's Assessment evaluated the fairness of loan and technical program delivery. The team interviewed 738 FSA employees, county committee members and advisors in a total of 90 counties throughout the 15 designated states. Unfortunately, FSA's mission "to equitably serve all farmers, ranchers and agricultural partners through the delivery of effective and efficient agricultural programs for all Americans" was found to be unaccomplished. The 2011 report concluded that because of a complicated application process, discriminatory County Committee system, non-diverse staff that is untrained and hostile towards diversity initiatives, barriers are created that thwart progress on initiatives.

Recommendations

- Change the FSA County Committee system to ensure un-biased program delivery;
- Employ more diverse staff members;
- Replace "outreach" with an aggressive marketing campaign to change the perception of the FSA as a discriminatory agency. Performance goals and measures should be met;
- Conduct disparity studies to identify adverse impacts within all farm programs to develop an action plan of improvement; and
- Streamline the application process to make it less onerous.

In comparing FSA's applicant demographics to population figures for all predominant minority groups, the Assessment team found repeated errors, inconsistencies and omissions in the data provided by USDA. Overall, the level of participation in the farm programs was significantly low with the exception of the Asian Guaranteed loan participants. Further, the report compared the diversity of FSA's current workforce with the population rates in the area. The team concluded that Blacks, Latinos and women are highly under-represented at the national, state, county, local and committee levels.

RD Assessment

The Assessment team evaluated the fairness of financial and technical program delivery. The team interviewed 698 RD employees in a total of 90 counties throughout the 15 designated states. The mission of RD "is to ensure that rural America thrives by improving the quality of life for all rural Americans." RD has three major program areas: Rural Housing and Community Facilities; Rural Business; and Rural Utilities. Five key RD barriers include SDFs' lack of program knowledge, impersonal workplace environment, facially neutral eligibility requirements, sub-par outreach efforts and remote locations.

Recommendations

- Create an extensive education and communications program targeted at minority communities;
- Establish certified training programs with CBOs to identify, educate and assist applicants in applying for programs that are needed in a particular area; and
- Reinstitute the Direct Lending Business Program to assist small and minority owned businesses, allowing smaller loan amounts to ensure success.

In comparing RD's applicant demographics to population figures for all major minority groups, the Assessment team found RD had high minority participation within its three programs. Unfortunately, workforce rates for minority personnel were low.

NRCS Assessment

The Assessment team evaluated the fairness of financial and technical program delivery. The team interviewed 540 NRCS employees in a total of 90 counties throughout the 15 designated states. NRCS mission is "to provide conservation planning and assistance to landowners with a goal of protecting soil, water, air, plants and animals. Key barriers for SDFs within NRCS are: program design, ranking, and application processes favor large producers over small producers; SDFs are not informed of program changes; mediocre outreach efforts; program administrative nuisances, i.e., eligibility and technical practices are not conducive to the unique needs of Native American farmers; and minorities and females are under-represented on every workforce level.

Recommendations

- A conservation program specifically designed for SDF needs should be created;
- Implement better training, application and administrative tools to provide better guidance for SDFs;

- The Conservation Stewardship Program should be funded separately from the Environmental Quality Incentive Program which has a higher SDF participation;
- NRCS should develop and fund a program specific to tribal lands, taking into consideration its unique ownership structure which makes it difficult to meet the present eligibility requirements; and
- Prioritize workforce diversity and require performance measure rewards and penalties regarding civil rights enforcement.

Minority participation rates were high compared to area population rates, except for the Wetland Reserve Easement Program which showed relatively low participation. Identical to the two agencies the team concluded that Blacks, Latinos and women are highly under-represented at the national, state, county, local and committee levels.

In looking at the statutory, regulations and policies the Jackson Lewis Report concluded that although they appear non-discriminatory, the leeway of discretion permits the use of discrimination in decision-making. The problems associated with filing a program and employment discrimination complaint, continue to perpetuate the opportunity for discriminatory practices. Due to administrative mistakes, long delays in processing, failure of investigation, plus a 97% average of non-findings of discrimination, there is an urgent need to improve the efficiency of the civil rights process. The report recommended that all loans programs and foreclosures of minority farmers within the past 12 months [at that time] should be re-evaluated. The Final Report listed 234 recommendations.

Tuskegee University-PAWC Redacted Case Studies

The approach to the Tuskegee University-PAWC assessment was a three-fold process that included academic professionals, USDA personnel, and local farmers. USDA personnel included the Alabama State Directors of FSA, RD, and NRCS and representative state staff from both the state office and from district and county offices. Redacted case studies were obtained from the three agencies in southeastern states and California in response to a direct request for such information. Fourteen case studies representing real life scenarios were selected from those submitted. Each case study included the name of the agency program, the applicant's service request, the outcome and the program policies which the decision was based on. The case studies were subsequently presented and assessed by participants at the PAWC. PAWC is an annual conference focused on issues facing rural communities and minority and underserved people in the South in particular, and also in the U.S. and the world in general (Professional Agricultural Workers Conference, 2010). In 2010, the 68th annual PAWC theme of "Empowering Underserved Farmers and Rural Communities by Changing Legislation, USDA Eligibility Requirements and Program Delivery" focused on challenges surrounding the implementation of the 2008 Diversity Initiatives. All fourteen case studies were evaluated in a workshop setting. Participants included national, regional and state USDA senior staff with an average of 20-35 years of experience from eight agencies. The members of the USDA staff that compiled the case studies were also present. The one-day workshop consisted of all 400 participants being randomly divided into seven groups; each group evaluated three case studies. Each group was divided into subgroups of six to ensure optimum participation. Facilitators, leaders and recorders were assigned to each group and subgroup.

All groups addressed the following five questions:

1. What should the producer/landowner/community/agency have done differently to ensure a positive outcome?
2. What other parties should have been involved to meet the program requirements?
3. What other resolutions could have been applied?
4. What means of communication between the agency and the applicant could have improved the outcome?
5. What changes in legislation and regulations are needed in order to improve program delivery?

Results and Recommendations

All comments were recorded and reported to the entire group in a final session, where further input was received. The background information (policy and regulatory bases), and results/recommendations for seven representative redacted case studies are summarized below.

A. Case Study One: USDA NRCS – Control of Land

Background Information

Governing regulations from National EQIP Manual - 515.51 Producer Eligibility
To be eligible to participate in EQIP, an applicant must meet all of the following criteria:

(1) Be a producer. A producer is all of the following:
(a) An individual, legal entity, Indian tribe, or joint operation with signature authority.
(b) Engaged in agricultural production or forestry management, or has an Interest in the agricultural or forestry operation associated with the land being offered for enrollment in EQIP. Applicants requesting assistance on nonindustrial private forest land must not be:
(i) Principally engaged in the primary processing of raw wood products; or
(ii) Corporations or other legal entities with publicly traded stock.
(c) Producing an annual minimum of $1,000 of agricultural products.
(2) Have control of the land for the term of the proposed contract period.
National EQIP Manual 440-515-161 - Have control of the land for the term of the proposed contract period. Applicant must have a deed, lease, or other written agreements signed by the land owner at the time of application and provide documentation upon spot check.

Scenario A

Farmer A enters NRCS office to apply for the Environmental Quality Incentives Program (EQIP). He needs financial assistance to improve plant and herd health by installing cross fencing, a well, water troughs, pipeline, and critical area plantings. He is informed he must meet all USDA eligibility requirements and have control of the land. Farmer A says he has control of the land and has been farming the land since his father’s death. However, the deed is still in his father’s name. Farmer A also has a sister who lives out of state and has no interest in the farm.

Scenario B

Farmer A enters NRCS office to apply for the Environmental Quality Incentives Program (EQIP). He is informed that he must meet all USDA eligibility requirements and have control of the land. Farmer A’s father is deceased and the land belongs to Farmer A’s mother and three sisters. Farmer A's mother told him he could farm the land. Farmer A's mother and two sisters live locally, however, the family cannot locate the third sibling. In both cases, Farmer A does not meet eligibility requirements because he cannot produce: (1) A deed with his name as sole owner or (2) A lease signed by all owners showing he has control of the land for the period of the contract.

Discussion Questions and Recommendations

1. What should the producer/landowner/community/agency have done differently for a positive outcome?
   - The agency could grant the landowner more time to get the deed executed in his name.
   - Landowner could get a lease or agreement from his sister for the duration of the contract.
2. What other parties could have been brought in to assist the farmer/landowner/community in meeting the requirement?
   - Need legal support to assist with deeds from a NGO.
   - More estate planning through Extension, CBOs and law centers.
   - More funding to support estate planning initiatives.
   - Entities that have information available should provide the information to USDA so that they can share with customers.
3. What other ways could this case have been resolved?
   - If a power of attorney could have been provided or written lease or sister could have been listed on the contract or she could have been bought out.
   - A will could have been developed.
4. How could communication between agencies and farmers/landowners/communities have been improved?
   - USDA and CBOs must ensure information is available to customers.
   - Clearly spell out what does and does not constitute "control of land"
5. What changes in legislation and regulations are needed in order to improve program delivery? Why?
   - Redefine control of land, refer to individual who has been maintaining and/or producing on the land
   - Increase the amount of household income for limited resource farmers.
   - Provision is needed to provide assurances to applicants for program participation that have history of farming the land.
   - Missing relatives should not inhibit program participation.
   - Need to have private sector assistance to help individuals clear their deeds
   - Perhaps a public notification system allowing a specified time for a missing person to clear up the deed issues.
   - Statement should be added to the contract that says information provided is true.

B. Case Study Two: USDA RD – Typical 502 Turn Down Scenario

Background Information

Application: Mr. Larry Easy filed a completed application on November 29, 2010 in hopes of obtaining a 502 Single Family Housing loan to purchase or build a home. Mr. Easy is 32 years of age.

Income: Mr. Easy has been employed as an LPN at the same work place for ten (10) years. His annual income is $25,000.00 which places him in the low income limit for the county he plans to finance his home. He has no dependents.

Repayment: Mr. Easy has six (6) months remaining on his truck installment. His VISA card has a minimum payment of $20.00 per month. His installment on the boat is $125.00 per month. Quick Finance has an installment of $50.00 per month with 12 months remaining.
Assets: Mr. Easy has $1500.00 in his savings account. His average two (2) month checking average balance is $500.00.

Credit: A review of Mr. Easy's Residential Mortgage Credit Report (RMCR) displayed three (3) credit scores of 560, 580, and 540. His credit report revealed four (4) open accounts that are noted below.

No Fuss Finance	Truck Loan 36 months reviewed:	
		12/30 2/60 2/90
	In last 12 months:	6/30 2/60 0/90
Click Credit Card	Credit Card 36 months reviewed:	
		15/30 1/60 0/90
	In last 12 months:	4/30 0/60 0/90
Last Chance Bank	Boat10 months reviewed:	
		1/30 0/60 0/90
	In last 12 months:	1/30 0/60 0/90

Agency requested explanation/reason and any documentation from Mr. Easy regarding circumstances that might have caused adverse credit to see if an exception/waiver could be considered. Mr. Easy did not respond.

Application is denied. Reason: Handbook-1-3550, 4.9 – "To be eligible for a Section 502 loan, applicants must demonstrate that they are reasonably able and willing to repay an Agency loan." Handbook-1-3550, 4.10 – "An applicant's credit record does not have to be perfect; a few instances of credit problems can be acceptable if an applicant's overall credit record demonstrates an ability and willingness to repay obligations." 7 CFR 3550.53(h) - "Applicants must have a credit history that indicates reasonable ability and willingness to meet debt obligations."

Discussion Questions and Recommendations

1. What should the producer/landowner/community/agency have done differently for a positive outcome?
   - Client should always respond by verbal-written communication
   - Offer education on financial literacy/credit
   - Applicant should have responded and provided an explanation of his past delinquencies
   - Agency personnel: need to become "multi-lingual", and explain policy in simple terms as well as follow-up with client
   - Agency needs to adopt language that is known in the community and include in the policy language.

2. What other parties could have been brought in to assist the farmer/landowner/community in meeting the requirement?

- Seek assistance from local CBOs
- Contact Habitat Humanity, local churches and neighbors.
- Host credit counseling seminars
- Contacted applicant’s creditors to adjust due dates of payments; pre-borrower training, and loan officer should make a list of what the client needs to get the loan.

3. What other ways could this case have been resolved?

- The applicant could have used his existing assets to pay down some of his debt.

4. How could communication between agencies and farmers/landowners/communities have been improved?

- More communication to assess his history could have been applied
- Provide pre-qualification training to clients.
- Identify another loan agency to refer applicant to
- Conduct pre-conferences to discuss application and credit scores.

5. What changes in legislation and regulations are needed in order to improve program delivery? Why?

- More diverse workforce at Federal office
- Agency follow-up; customer service enhancement
- More education on available programs
- Certify letters to clients
- Clarify appeal rights
- Improve pre-loan conferencing services in agency offices.

C. Case study Three: USDA NRCS – Irrigation Policy and Eligibility

Background Information

Regulation 440-CPM-515.81
D. Ineligible Practices: (1) Ineligible practices are those: (a) Where the sole purpose is to enhance production without an identifiable conservation benefit or natural resource concern. Examples include: (i) Water Well (642) used to bring new land under irrigation is an ineligible practice. Water well (642) installed for irrigation must be used to increase efficiency of an existing irrigation system.

Regulation 440-515.52
A. (5) Have irrigated 2 out of the last 5 years to install water conservation or irrigation related practice.

Regulation 440-CPM-515.51
A. Producer Eligibility Criteria
(1) Be a producer. A producer is all of the following: (c) Producing an annual minimum of $1,000 of agricultural products.

Regulation 440-515.51
(4) Subsistence Producers: Individual and families engaged in agricultural production for subsistence purposes are eligible for EQIP if they meet the requirements of 440-CPM, Part 515, Subpart F. However, the value of the production of food and fiber, had it been sold, must be used to document the $1,000 requirement if the production is: (a) The primary source of family consumption and use, or (b) Used in barter and trade.

Scenario
Farmer B grows and sells vegetables at local markets. He has been irrigating the crops by hand. Farmer B enters the NRCS office to sign-up for plasticulture, micro-irrigation, and a well. He is told he is not eligible for the well due to lack of irrigation history (no existing irrigation system in place).

Discussion Questions and Recommendations
1. What should the producer/landowner/community/agency done differently for a positive outcome?
- The Agency should consider the size, operation type and use the information to make a case by case decision.
- Offer cheaper irrigation alternatives, define what records are acceptable and apply the definition of irrigation broadly.

2. What other parties could have been brought in to assist the farmer/landowner/community in meeting the requirement?
- Seek assistance from CBOs, Soil and Water Conservation Districts, Extension and educational institutions. Neighbors, CBOs and productions yields can corroborate the farmer’s history.

3. What other ways could this case have been resolved?
- Encourage farmer to record history of watering
- On-site determination with possible resolutions, refer producer to other agencies that can offer assistance.

4. How could communication between agencies and farmers/landowners/communities have been improved?
- Work closely with the agency, Extension, CBOs to ensure a liaison is present to represent all parties.
- Conduct an in-person meeting to discuss conservation benefits.

5. What changes in legislation and regulations are needed in order to improve program delivery? Why?
- Clarity or flexibility of legislation

D. Case Study Four: USDA FSA – Credit Worthiness

Background Information
Operating loan funds may only be used for:
[7 CFR 764.251(a) (10)] Refinancing farm-related debts other than real estate to improve the farm’s profitability...

Scenario
Applicant submitted an application for an operating loan to purchase equipment for a cattle operation. A review of the applicant's credit report revealed a substantial amount of debt in collections. After further discussion and review it was determined the debt was the result of unpaid medical bills. Current policy does not allow the refinancing of medical debt (nonfarm debt). The inability to refinance nonfarm debt especially medical debt is an obstacle that caused not only this applicant but many loan applicants the inability to cash flow. Creditor information is used to determine creditworthiness and feasibility of loan repayment.

Discussion Questions and Recommendations
1. What should the producer/ landowner/community/agency have done differently for a positive outcome?

- Agency staff should review the application with farmers to ensure clarity of the information.
- Producers should contact and seek assistance from hospital to work out medical payment plan.
- Applicant should submit bills to FSA to show current payment history.
- All parties should restructure information records to reflect $1,000 worth of productivity to meet the requirement
- Reconstruct medical debt with the provider, and if collateral is sufficient FSA should grant the loan

2. What other parties could have been brought in to assist the farmer/landowner/community in meeting the requirement?

- Credit counselors, 1890 institutions, local faith-based organizations and CBOs.

3. What other ways could this case have been resolved?

- Communicate with producer what they need to do to resolve debt issues.
- Agency should provide detailed fact sheets
- Agency could provide record keeping system templates through outreach and education.
- Applicant should seek a repayment plan with the medical provider prior to applying for loan.

4. How could communication between agencies and farmers/landowners/communities have been improved?

- Loan officer should take the extra steps in referring SDFs to a credit counselor.
- A fact sheet should be made available during pre-application trainings to provide basic information.
- FSA should conduct more face-to-face meetings to explain the programs in an effort to increase SDF participation.
- FSA should work more closely with 1890s and CBOs to develop a comprehensive program targeted towards SDFs.

5. What changes in legislation and regulations are needed in order to improve program delivery? Why?

- Exempt medical bills from farm loan considerations
- If there is documentation of an improved payment history it should be taken into consideration regarding credit worthiness.

- Policy should consider unexpected hardships (i.e., medical bill)
- 2012 Farm Bill should complete a study reviewing how other government agencies handle the treatment of outstanding medical debt. For example, what does the Small Business Administration do when approving loans?
- Allow an appeal process and communicate this to potential applicants that will allow them to pay 10% of their last year's AGI (Adjusted Gross Income) from their 1040 or 10% of their medical bill expenses.
- Add exemptions for nonfarm medical debt for SDFs only.

E. Case Study Five: USDA NRCS – Socially Disadvantaged Terminology

Background Information

According to Section 2501(e) (2) of the Food, Agriculture, Conservation, and Trade Act of 1990 (7 USC 2279(e) (2)), a Socially Disadvantaged Farmer or Rancher (SDA) is defined as a farmer or rancher who is a member of a "Socially Disadvantaged Group." Therefore a "Socially Disadvantaged Farmer or Rancher" is defined as:

Socially Disadvantaged Group - a group whose members have been subjected to racial or ethnic prejudice because of their identity as members of a group without regard to their individual qualities. The definition that applies to Titles I, V, and VI includes members of a group subject to gender prejudice, while the definition that applies to Titles II, IX, XII, and XV does not. Title XIV and the Education and Risk Management Assistance provision in Title XII do not make specific reference to the statutory definition of socially disadvantaged farmer or rancher.

Socially Disadvantaged Farmer or Rancher - a farmer or rancher who has been subjected to racial or ethnic prejudices because of their identity as a member of a group without regard to their individual qualities. This term means a farmer or rancher who is a member of a socially disadvantaged group. Specifically, it means a group whose members have been subjected to racial or ethnic prejudice because of their identity as members of a group without regard to their individual qualities. Those groups include African Americans, American Indians or Alaskan natives, Hispanics, and Asians or Pacific Islanders.

Definition of … Term "Socially Disadvantaged" as defined on the NRCS-CPA-1202 Appendix G: The term "Socially Disadvantaged" means an individual or entity who is a member of a socially disadvantaged group. A socially disadvantaged group is a group whose members have been subject to racial or ethnic prejudice because of their identity as members of a group without regard to their individual qualities. These groups consist of the following:
- American Indians or Alaskan Natives
- Asians
- Blacks or African Americans
- Native Hawaiians or other Pacific Islanders
- Hispanics.

Note: Gender alone is not a covered group for the purposes of NRCS conservation programs. And entities reflect a broad interpretation to include partnerships, couples, legal entities, etc.

Scenario A: Socially Disadvantaged Terminology
An African American producer applied for EQIP. The NRCS employee and producer reviewed the NRCS-CPA-1200 application together. The NRCS employee ensured the applicant was made aware of the opportunity to check the box "Are you applying for program benefits as a socially disadvantaged farmer or rancher?" resulting in the applicant expressing that this label was insulting to him as an African American. Being a "beginning farmer", the applicant felt legitimately eligible and was not offended by signing up for this higher-rate of financial assistance. The NRCS employee indicated the applicant would not have signed up as socially disadvantaged, even if the beginning farmer and rancher category had not been available.

Scenario B: Socially Disadvantaged Terminology
A producer was reviewing his EQIP application with an NRCS field office employee. The NRCS employee observed that the applicant was "white" and reviewed the definition of "socially disadvantaged". The applicant replied that he was an American Indian brought up on a reservation and spoke his native language fluently. After a cordial interchange of the person's upbringing as an American Indian (the NRCS employee was also of American Indian heritage), the applicant responded, "I did not know that I was socially disadvantaged", laughed a bit and appeared embarrassed. The applicant checked the "socially disadvantaged" box.

Scenario C: Socially Disadvantaged Terminology
A meeting (similar to a Local Work Group meeting) was held at an Extension Office to discuss outreach activities and other topics. Participants were local farmers and ranchers and representatives from various agencies. During the discussion, the term "socially disadvantaged" was used. One Hispanic farmer stood up and said that he was offended by the term "socially disadvantaged". He said that he preferred the term "minority" or "underserved" and that they (the members of the so-called group) should be called what they are, implying "minorities" or "Hispanics".

Scenario D: Socially Disadvantaged Terminology
A farmer submits an EQIP application. He was a second generation American whose parents were from the Indian sub-continent. Upon reviewing the application with the NRCS employee, the applicant asked, "Why are you using the term "socially disadvantaged?" He felt the term referred to low-income status. The NRCS employee explained that the term meant "historically underserved minority groups" and did not refer to economic status. The NRCS employee spent about 10-15 minutes discussing the topic with the applicant to ensure there were no misunderstandings or hard feelings. The applicant checked the socially disadvantaged box on the NRCS-CPA-1200 form.

Discussion Question and Recommendations
1. What should the producer/landowner/community/agency have done differently for a positive outcome?

- Agency should have user-friendly definition and outline of benefits as related to USDA Programs (NRCS, FSA and RD)
- Agency work closer with producer to get information throughout communities through Communication/Training (Outreach Efforts)

- Consider revising term from “Socially Disadvantaged” to “Underserved” or “Minority Group”
- Agency representative should not assume client status
- NRCS Online Application
- The terminology should be changed, or explained better; in one of the scenarios, it was not initially obvious to the applicant that he/she was a SDF, since he/she didn't initially check the box. In that case, it was the agency official’s responsibility to explain what the meaning was and he/she did so.
- SDF label is very much stigmatized, there is a definite need for education as well as communication and organization is vital to increasing the participation with minority farmers. NRCS needs to explain the requirements and the do's and don'ts to ensure fair treatment, we can rewrite the farm bill but if NRCS employees do not do what they are supposed to do the problems will continue.
- Agree with previous comments to increase outreach and education, providing information when farmers visit the state office. Applicants need to know what they are getting into, they need to be prepared to supply certain information, and they need to have specific items prior to entering the office. SDF is not favorable but they need to know what the definition means, not dumbed down, come in and apply for programs or loans and not be shocked by the term. Meaning they already should know they are part of the SDF group; the thing we don't want to happen is to not apply for a program or loan because of the stigma.
- USDA employees need to know who they are working with; random checks and audits; need to be checks and balances in place.

2. What other parties could have been brought in to assist the farmer/landowner/community in meeting the requirement?

- Train community residents
- Identify low-income communities, conduct training/listen sessions (Farmers-training - farmers)
- Agency: Explain definition and benefits as it relates to program or loan
- Producer: Should carry back information to community-lead by example
- Agent: Better Training
- Policy needs to be explained in writing, to allow the applicant to make the decision; if that does not work, then there will be a need to host community meetings, i.e., extensive outreach
- Need to bring people to the table in the community who are success stories. This will increase the trust of the agency, also making sure that clients understand their roles and responsibilities in the two party agreements to break down the barriers. Improve the communications to build trust to dissolve the perceptions of the past.

3. What other ways could this case have been resolved?

- Agency representative display interest in client needs/concerns
- Community training or train local leaders to assist in efforts (Outreach)
- Provide regular training to community.
- Farmers listen to other farmers.
- Review documentation
- Properly communicating or explaining term
- The scenarios are about an attitude fostered by a definition, with a stigma attached. A group of people were concerned and gender was also a consideration that was a factor in devising the definition. Similar to minority contracts, once applied you are tagged as being a recipient of “free money”. The definition is simple; it fits a large majority of limited resource or low-income farmers. We need to improve outreach through grassroots organizations and 1890 Universities; these are not well-funded; fund the 1890s to conduct outreach programs; don't have to change the term socially disadvantaged.

4. How could communication between agencies and farmers/landowners/communities have been improved?

- Improve Communication (Outreach)
- Training on definitions and how they apply; Group training
- When the SDF definition came out, there should have been a public call or rally to change the definition. In rural communities these people can be socially disadvantaged and they are taking it offensively because it has not been properly explained to them
- Communications between agencies could be improved by better marketing programs.
- SDF need to be explained better so their participation is not avoided. Being trained to explain the programs in simple terms and information sharing with communities is essential.

5. What changes in legislation and regulations are needed in order to improve program delivery? Why?

- Improve communication (outreach)
- Training on definitions and how they apply; group training; community training or local leaders.
- List “Race” instead of term “Socially Disadvantaged”
- Use less offensive language
- Impact of race, religion, and relationships during interactions between applicants, CBOs and agency representatives
- Definition is offensive, i.e., “Socially Disadvantaged”
- The term needs to be amended
- As we move forward, let us develop better relationships.
- SDF is not a meaningful term, amending the 2012 Farm Bill replacing it with “historically disadvantaged farmer.”
- Clarification in legislation is preferable; make sure people have access to simple explained policy definitions.

F. Case Study Six: USDA RD -- Typical 504 Turn Down Scenario

Background Information
Housing 504 Repair Loan Application: Mary Smith submits a completed application for a USDA Rural Development Single Family Housing 504 repair loan for the home she owns and lives in. The application is for $15,000 in loan funds. Ms. Smith also submits all her personally required documentation.

Property: A field visit is conducted on Ms. Smith's home after receiving her completed application. The dwelling was found to be in an eligible area and all the repairs to be done are eligible for 504 loan funds. Ms. Smith is advised to solicit at least 3 bids for the repair work.

Credit: After ordering and receiving a RMCR (Residential Mortgage Credit Report) Ms. Smith's credit scores are 702, 683, and 691, with a middle score of 691 and no outstanding judgments in a U.S. Federal Court; Ms. Smith's credit is acceptable.

Income: Ms. Smith is 66 years of age (elderly household) and receives Social Security Retirement Benefit as her sole source of income. Her benefit is $908 per month, $10,896 per year. Ms. Smith's income is below the poverty level for a one-person household in the county she lives in; therefore, she does meet the program income requirements.

Repayment Ability: After reviewing Ms. Smith's income and her household monthly budget it is determined that she does have repayment ability to make the necessary loan payment of $68.98 per month.

Assets: Ms. Smith has two bank accounts, one savings and one checking. The savings account has a balance of $1,119 and the average two month balance in the checking is $402. Ms. Smith also has a one-quarter interest in 250 acres of land which she inherited. Her interest is valued at $75,000.

Application is denied – Reason: HandBook-1-3550, 12.4 (c) – "The limitation on nonretirement assets for elderly households is $20,000." 7 CFR 3550.103 (e) – "Applicants must be unable to obtain financial assistance at reasonable terms and conditions from non-RHS credit or grant sources and lack the personal resources to meet their needs. Elderly families must use any net family assets in excess of $20,000 to reduce their section 504 request."

Discussion Questions and Recommendations
1. What should the producer/ landowner/community/agency done differently for a positive outcome?
- The applicant has to submit a form with her direct deposit information and Social Security number.
- For a positive outcome, a checklist for initial requirements should clarify options for applicant.

2. What other parties could have been brought in to assist the farmer/landowner/community in meeting the requirements?

- County agents, non-governmental organizations, community-based organizations, etc. could have been involved.
- Assistance from Extension, CBOs can help with education about program.

3. What other ways could this case been resolved?
    - Streamline application process to help all people
    - Hardship should have been chosen over waiver
    - Resolution options – recognition of the nature of heir property and removing it from the regulations; grants to meet the need of homeowner
4. How could communication between agencies and farmers/landowners/communities have been improved?
    - Requirements should be explained in advance
    - Decrease the number of acronyms used
    - A checklist needed for special cases (hand written or computerized)
    - Communications about the requirements should be explained early in the process
5. What changes in legislation and regulations are needed in order to improve program delivery? Why?
    - The regulation should be changed to allow a $200,000 asset exclusion.
    - Loan process should not include the asset in the review if there is the ability to pay.
    - If the loan is not repaid, or there is a change in income flow, encourage simplification and review the application.
    - In reviewing and re-writing the policy, grassroots voices should be included in the process.

G. Case Study Seven: USDA FSA – Youth Loans

Background Information
Governing Regulations
Regulation 31 C.F.R. § 285.13
Barring delinquent debtors from obtaining Federal loans or loan insurance or guarantees

Regulation 31 C.F.R. § 285.4
Offset of Federal benefit payments to collect past-due, legally enforceable nontax debt

Regulation 31 C.F.R. § 285.2
Offset of tax refund payments to collect past-due, legally enforceable nontax debt

Youth completed application package for a youth loan in the amount of $5,000. Loan was approved and funds distributed. After two years of payments the youth's account became delinquent (non-payment). Guardian explained that proceeds from the sale of livestock were used for the purchase of other needed items (e.g. feed, family living items) instead of applying to the loan as required. This was an improper use of funds, and as a result the loan was accelerated and eventually charged-off for non-payment of account. These circumstances have caused many youth borrowers to become ineligible for additional loans and any other Federal benefits (e.g., student loans).

Discussion Questions and Recommendations

1. What should the producer/ landowner/community/agency have done differently for a positive outcome?

- Child/guardian should have contacted the loan officer before the loan came in default
- The applicant/participant should not have used the funds for other or family needs
- Cosigner and signer could have taken the loan to a third party for review or be required to attend a pre-loan conference. A question at this review or conference could have been: "are you sure you still want to take out the loan?"
- Parents should have been more informed of debt obligations; rescheduling; better termination of loan usage; assistance to the family since low income; check and balances in the process, i.e., use of 1890 Universities or agricultural economics departments.

2. What other parties could have been brought in to assist the farmer/landowner/community in meeting the requirements?

- Encourage the use of business mentors
- Need stronger mentoring

3. What other ways could this case have been resolved?

- Defer loan for 6 to 12 months, until family could begin loan repayment process
- Should have restructured the loan
- More FSA training

4. How could communication between agencies and farmers/landowners/communities have been improved?

- Better explanation for the youth and the parents
- Need to do role playing and scenarios with parents to indicate the seriousness of loan applications

5. What changes in legislation and regulations are needed in order to improve program delivery? Why?

- Agencies should notify borrower after first month's payment was missed. Mediation process should be engaged.
- Parent and child must have mandatory training
- 50/50 match loan/grant with proper documentation
- Half operating funds upfront, upon repayment or proper documentation/status review then second half of loan is dispersed.
- Remove statute 31 C.F.R ss 285.13 barring delinquent youth from obtaining additional or other loans, especially education loans.
- In the case where a parent is taking control of the child's loan and misusing it, the parent should sign for the loan so that the child's credit is not affected.
- Amend legislation in order to eliminate youth credit history, require a parent co-signor, and make the parent financially responsible.
- Stronger mentoring should be required.
- Stricter regulation of loans and need to address hardship situations
- Need to change the age limit to 16
- Send the loan to a local 4H to let them administer the loan

The recommendations are a reflection and summarization of hours of lively discussions that were stimulated by the questions and brought to life by the participants. Critical to the discussion process was the cross section of diverse, committed people in each group. Recall that many were senior agricultural professionals, who had been selected to participate because of their sincere interest in positive change in USDA service delivery to SDFs and rural communities. Farmers from six states, university Extension and research faculty and staff, students and leaders of CBOs were in each group. The recommendations included short-, medium-, and long-term solutions. The long-term solutions would require policy changes at the Congressional level. However, short- and medium-term solutions could be addressed by the persons at the conference and their colleagues in respective states. The USDA employees, 1890 Land Grant University faculty and staff, farmer-leaders, and CBO leaders from respective communities had the power to take small steps and begin the process of improving access to programs and services, immediately, especially if they work together.

Small Steps Forward

The conference itself manifested change. During the conference, Secretary Tom Vilsack and President Gilbert Rochon signed an MOU to establish the Carver Integrative Sustainability Center, which is a partnership of NRCS, FSA, RD and other USDA agencies and Tuskegee University which focuses on bridging the gaps between SDF and rural community needs, and provides access to resources historically off limits because of USDA policies/regulations/actions. NRCS irrigation and hoop house opportunities abound throughout the southern states and nation providing new opportunities for small farmers and FSA instituted the micro-loan program ($35,000 or less) for small farmers. Other examples spawned from the spirit of the 2010 PAWC include the NRCS Irrigation project for SDFs; which provided drip irrigation and solar power to SDFs who are members of the Alabama Small Farmers Cooperative (eight counties). The private sector participated through the Walmart Foundation funded project "Sustainable Agriculture Consortium for Historically Disadvantaged Farmers" that sought to encourage SDFs in five states (AL, AR, GA, MS, and TX) to work together and market fruits and vegetables to commercial markets. Another new initiative that holds promise for enhancing access to USDA programs and USDA's relationship with rural communities is the USDA "Strike Force" Initiative that was expanded in 2012 to include states across the nation with persistent poverty counties. The "Strike Force" Initiative encourages agencies working across boundaries and integrally with CBOs and Land Grant Universities to fill gaps and meet needs in new ways that serve underserved communities, especially those in rural areas.

Conclusion

The purpose of this article was to assess attempts by the USDA to deal with reducing or eliminating discriminatory practices toward SDFs in its programs. CRAT was established in 1997 in an effort to change the USDA's civil rights practices. CRAT released 92 recommendations, including adopting and enforcing a policy that the Department would take the appropriate adverse or disciplinary action against any manager found guilty of reprisal against any USDA employees or customers; creating more simple paperwork process for filing discrimination complaints; and establishing a new Civil Rights Office that handles employee and program complaints. As a result of the CRAT Report, certain gains were achieved, for example, increasing funding to SDF programs and increasing minority representation on FSA state committees. An offshoot of the CRAT Report was the set of 2008 Diversity Initiatives such as the Beginning Farm and Rancher Development Program, Value-Added Producer Grant Program, and set asides were created within the Environmental Quality Incentive Program (EQIP) and Conservation Stewardship Program (CSP) for SDFs.

Despite these efforts the Jackson Lewis Report, 2011, found that the USDA (FSA, RD, and NRCS particularly) was not fully implementing programmatic changes. Actions dealing with the situation, such as personnel training, evaluations, oversight and proper customer service were recommended. Participants at the PAWC in December 2010 assessed real world case studies from the FSA, RD, and NRCS and found signs of inadequate customer service regarding SDFs' search for ways to enhance access to resources and services provided by the agencies. Recommendations were made regarding solutions to these barriers.

Based on the above, the USDA, especially FSA, RD, and NRCS, should: stay on the path to reform itself or continue to improve its civil rights practices; be more customer service-oriented; follow-up on clients; be transparent by providing all information or steps in the process upfront; continuously provide training for all frontline staff; create and meet target goal of assisting SDFs; and continue using 1890s, CBOs, and other outreach entities to reach SDFs. The most important finding from the PAWC redacted case assessment was that when farmers, USDA agency local leaders, 1890 Land Grant faculty and staff, and CBOs openly and honestly address challenges together, solutions can be found opening the way to reach people and effect change. In this regard, supporting resources must become more readily accessible for SDFs and rural communities. Policy changes and actions (short-, medium-, and long-term) must be found and implemented. Initiatives such as the "Strike Force" should be encouraged and supported.

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