



May 22, 2019

VIA EMAIL: [reg-comm@fca.gov](mailto:reg-comm@fca.gov)

Mr. Barry F. Mardock  
Deputy Director  
Office of Regulatory Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, VA 22102-5090

RE: Advanced Notice of Proposed Rulemaking – Young, Beginning, and Small Farmers and Ranchers – RIN 3052-AD32/Federal Register 94, No. 35 (February 21, 2019)

Dear Mr. Mardock:

Thank you for the opportunity to comment on the above-referenced ANPRM regarding Young, Beginning, and Small Farmers and Ranchers (“YBS Farmers”) to address issues associated with collecting and reporting data from associations of the Farm Credit System (the “System”) with respect to YBA Farmers.

Farm Credit Mid-America, ACA (“Farm Credit Mid-America”) is committed to achieving the mission set forth by the Farm Credit Administration (“FCA”) of serving YBS Farmers by offering financing as well as services to YBS Farmers. Farm Credit Mid-America takes great pride in providing financing to and assisting with the education and growth of YBS Farmers. A prime example of a service provided by Farm Credit Mid-America to YBS Farmers is its successful program, Growing Forward. The Growing Forward program fosters and promotes a practical learning environment to help young farmers set themselves up for success in agriculture. The goal of the Growing Forward program is to help remove financial barriers, deliver financial skills-building programs and provide educational tools among those who desire a future in production in agriculture. Growing Forward consists of hands-on management sessions and personalized education programs. In 2018, more than 200 operations made up largely of customers younger than 35 and 10 or fewer years of farming experience benefited from special workshops, bringing Farm Credit Mid-America’s program total to more than 900 farming operations that have participated in its conferences.

In response to the ANPRM regarding YBS Farmers, Farm Credit Mid-America generally supports the comment letters submitted by both the Farm Credit Council (the "Council") and AgriBank, FCB ("AgriBank"). Farm Credit Mid-America agrees with the overall sentiment set forth in both the letters of the Council and AgriBank that the current regulatory requirements in FCA Regulation 614.4165 are sufficient and no changes to the regulations are necessary. As stated by both the Council and AgriBank, in the event FCA wishes to change or improve reporting requirements related to YBS Farmers, Farm Credit Mid-America agrees that FCA can implement reporting requirements through a "FAQ" or similar guidance to the System.

Farm Credit Mid-America recognizes that, with regard to suggestions on reporting requirements, the letters submitted by the Council and AgriBank differ on two questions posed by FCA. Therefore, Farm Credit Mid-America sets forth its approach on those two questions below.

**Question 1: Should loans continue to be reported in all the existing categories in which they fit? Alternatively, should loans be reported in seven mutually exclusive categories: Young; beginning; small; young and small; young and beginning; beginning and small; and young, beginning, and small?**

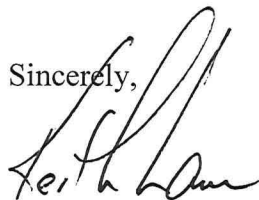
Farm Credit Mid-America believes that, if FCA changes the method by which loans are reported, seven mutually exclusive categories is the best method to achieving accuracy and transparency in the data.

**Question 2: When reporting YBS Farmer program performance, which would be more useful, a focus on the dollar volume of loans, the number of loans, the number of YBS Farmers that received credit and services, a combination of these, or all?**

Farm Credit Mid-America agrees with AgriBank's approach to report based on the dollar volume of the loans.

For the above reasons, and the reasons stated in the comment letters from the Council and AgriBank, Farm Credit Mid-America urges FCA to make no changes to the existing regulations related to YBS Farmers, but rather should address any changes in reporting in the form of a "FAQ" or similar guidance to the System.

We appreciate the opportunity to comment on the proposed rule and FCA's willingness to consider our feedback.

Sincerely,  


Keith Lane  
Executive Vice President and Chief Lending Officer