October 7, 2022

Submitted via email to: [*reg-comm@fca.gov*](mailto:reg-comm@fca.gov)

Mr. Kevin Kramp

Deputy Director

Office of Regulatory Policy

Farm Credit Administration

1501 Farm Credit Drive

McLean, Virginia 22102-5090

**RE:** Proposed Rule

Dear Mr. Kramp:

Farm Credit Foundations, a service corporation charted under Section 4.25 of the Farm Credit Act of 1971, appreciates the opportunity to comment on regulations that may be unnecessary, unduly burdensome or costly, duplicative of other requirements, outmoded, insufficient, ineffective.

As FCA considers the burden of regulation, I want to bring forward a challenge faced by 4.25 organizations to your attention. The inability to allow the appointed directors of our owner organizations to serve as a board members of a 4.25 service organization significantly impacts the ability of Foundations to source appropriate Directors. Our business is significantly different than our owners and the specialized backgrounds of many of Farm Credit’s appointed directors would serve us best in bringing the knowledge and understanding of employee benefits business we are in. We respectfully request that the regulation limiting appointed directors from serving on 4.25 organizations be reviewed.

Thank you for the consideration.

Sincerely,



Teresa Heath-Alva

Farm Credit Foundations CEO

651-746-9024