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March 31, 2025 via email submission

Autumn R. Agans, Deputy Director  
Office of Agency Policy  
Farm Credit Administration  
1501 Farm Credit Drive  
McLean, VA 22102-5090

Re: Response to Proposed Rule – *Internal Control Over Financial Reporting*, Farm Credit Administration, Agency; 12 CFR 62012 CFR 630; 89 FR 94615: RIN 3052-AD56 ("Proposed Rule")

Dear Ms. Agans:

This letter is submitted to express support for the Farm Credit System (the "System") comment letter dated and submitted on March 31, 2025, to the Farm Credit Administration ("FCA") with respect to the Farm Credit Administration ("FCA") proposed rule on Internal Control over Financial Reporting that was published in the Federal Register on November 29, 2024 ("Proposed Rule").

GreenStone Farm Credit Services, ACA and FLCA, ("GreenStone") participated in the System Internal Control over Financial Reporting Work Group ("Work Group") assisting in the analysis of impact and compilation of comments on the Proposed Rule. GreenStone wholly understands all aspects of the comments made in the comment letter. This Work Group provided a comprehensive and complete analysis of the Proposed Rule which GreenStone fully supports. We respectfully encourage the FCA to consider the System comment letter and withdraw the Proposed Rule.

Many aspects of the System comment letter are worthy of accentuating to assure the FCA soundly absorbs the impact and redundancy of the Proposed Rule. Without diminishing any aspect of the System comments or calling out the strength of one comment over another, the weight and totality of the comments compel the retraction of the Proposed Rule. It is important to understand viewpoints from a cooperative association focused on meeting its System territorial mission.

The ICFR Work Group has implemented, and GreenStone has adopted, an abundance of templates and tools to design existing robust internal control procedures with proven results. As these tools and templates have been adopted Systemwide, it has already provided the debt securities marketplace with the necessary confidence in the System



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disclosure and governance structure. To add more rules will add expense and potentially undermine prevailing confidence in the existing reporting. Investors have confidence in our current reporting process and there is no reason to jeopardize this confidence.

Examinations and reviews of GreenStone practices include ICFR materials reviewed annually by our auditor, PricewaterhouseCoopers as well as our District Bank, AgriBank, under our General Financing Agreement. This is part of our rigorous existing review process that provides the necessary oversight and comfort required for sound internal control practices. The Proposed Rule adds nothing to strengthen this process except increasing expense. Adding unnecessary costs directly impacts members equity on a dollar-for-dollar basis. Our rough cost estimate of implementing this redundant regulation has been estimated at between \$550,000 and \$900,000 annually for additional staff members and increased audit fees. Again, this directly detracts from the ability of the Association to serve its critical cooperative mission.

Each association and System entity benefits from an existing independent audit. The requirements of independent audits along with FCA examinations complement each other providing investor confidence and bolsters the safety and soundness of the System. To add more requirements serves no purpose as conveyed in the System comment letter. The totality of the comments in the comment letter makes a strong case for abandoning this Proposed Rule.

As accentuated above and clearly articulated in the System comment letter, we believe the adoption of the Proposed Rule is unnecessary and will serve to undermine the overall mission of the Farm Credit System. The Farm Credit System structure and management is thoroughly doing the work to accomplish the objectives over ICFR. We respectfully request FCA withdraw this Proposed Rule.

Sincerely,

A handwritten signature in blue ink that reads "Travis D. Jones". The signature is fluid and cursive, with the first name "Travis" being more prominent.

Travis D. Jones

Chief Executive Officer

CC: GreenStone Board of Directors