Farm Service Agency: A Clear Path Forward to Providing the Highest Level of Customer Service
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A Report by a Panel of the
NATIONAL ACADEMY OF
PUBLIC ADMINISTRATION

For the Farm Service Agency

August 26, 2016

Farm Service Agency:
A Clear Path Forward to Providing the Highest Level of Customer Service

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By providing producers with income support and disaster assistance, helping to ensure producers have access to credit, and assisting producers with resource conservation practices, USDA’s Farm Services Agency (FSA) plays a vitally important role in supporting American agriculture. Since its creation in 1995, FSA has faced a recurring challenge of maintaining customer service while reducing its field offices and staff in response to budget constraints and calls for greater efficiency. FSA’s 2015 proposal to close 250 local service centers caught the attention of Congress given possible impacts on customer service. Congress imposed a moratorium on office closures, directed FSA to do a workload analysis, and mandated that the National Academy of Public Administration (the Academy) conduct an independent assessment of this analysis and “determine a clear path forward to ensure the agency continues to provide the highest level of customer service.”

The Academy formed a Panel of five Fellows supported by a professional study team to conduct this year-long study based on extensive independent research, including interviews with agency officials in both headquarters and the field; employee groups; external customer/stakeholder groups and oversight bodies; and in-person visits to FSA’s local service centers and state offices. The Panel reviewed the challenges to FSA’s service delivery efforts, the constraints it faces in adjusting to these challenges, and the agency’s ongoing efforts to improve customer service. Based on this assessment, which also included a review of effective practices in customer service, the Panel developed recommendations intended to inform Congress and FSA about options for moving forward with respect to five core objectives:

1. Improve the efficiency and quality of in-person service delivery, while developing online/self-service delivery options.
2. Adapt programs, delivery and outreach to meet the needs of historically underserved and new/beginning producers.
3. Institutionalize an integrated agency-wide approach to customer service.
4. Build workforce capacity and skills.
5. Improve workload analysis/staffing model capabilities.

As a congressionally chartered non-partisan and non-profit organization with over 800 distinguished Fellows, the Academy brings nationally-recognized public administration experts together to help public organizations address critical governance and management issues. We appreciate that Congress turned to us to conduct this review and are grateful for the constructive engagement of the agency’s personnel and outside stakeholders who provided important insight and context needed to inform this report. This work could not have been completed without the Academy Panel, who provided invaluable expertise and thoughtful analysis to this undertaking, and the professional study team that provided critical support throughout the project.

Dan G. Blair
President and Chief Executive Officer
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The Farm Service Agency (FSA) enjoys a strong reputation for customer service. However, this reputation is based on an in-person service delivery model that faces a number of significant challenges, including budget constraints, increasing workload from program expansion, increasing demands to focus more intensively on outreach to historically underserved customer groups, new customer needs for assistance, staff retirements, and changes in technology and customer service delivery preferences. Also, in recent years, FSA has come under pressure to adapt its programs and delivery, as well as its outreach, to meet the particular needs of historically underserved and new and new/beginning farmers and ranchers.\(^1\)

These challenges may also be seen as opportunities. For example, staff retirements offer an opportunity to hire a new generation more comfortable and conversant in technology and to train them in new approaches to service delivery that promise to improve delivery of existing programs, but also knit them together with a broad array of USDA programs and other resources farmers and ranchers need to prosper in a changing environment. FSA’s Bridges to Opportunity initiative promises to provide a platform for a more expansive approach to meeting producer needs, while improving delivery of core FSA programs.

That said, it is critical that FSA improve the efficiency of in-person service delivery if it is to meet increased workload, while maintaining the quality of service. At the same time, it must respond to growing customer demand for online delivery options. However, the ability of FSA to improve the efficiency of in-person delivery and to adopt online service delivery is constrained by factors including: legacy IT infrastructure, restrictions on making adjustments to field office structure, program complexity and technical assistance requirements, resistance of older customers to online services, and lack of adequate internet access in some rural areas, either for lack of infrastructure or poverty.

FSA has taken important steps to increase the efficiency of its in-person service delivery, including the Acreage and Crop Reporting and Streamlining Initiative (ACRSI). Upgrades to increase the speed and reliability of FSA’s IT infrastructure promise significant improvements in efficiency. In addition to maintaining quality of service by improving efficiency, there are opportunities to significantly improve the quality of customer service on its own. These include the Bridges to Opportunity initiative and possible adjustments to FSA’s current field office footprint. While FSA has taken some steps to expand and improve

\(^1\) FSA uses the term “historically underserved” to encompass new/beginning producers along with a diverse range of other groups such as producers from minority populations and small producers of specialty crops. The Panel calls out new/beginning farmers because of the particular focus of USDA on improving service delivery and outreach to this group. Also, the Panel wishes to emphasize that while all these groups may be considered underserved, the reasons are different. Producers from minority groups were underserved not for lack of program offerings, but due to racial and ethnic prejudice. (See listing of historically underserved customer groups here: [http://www.fsa.usda.gov/programs-and-services/outreach-and-education/about-us/index](http://www.fsa.usda.gov/programs-and-services/outreach-and-education/about-us/index))
online delivery in some areas such as Farm Program loan applications, the agency lacks a systematic approach to the development of online/self-service delivery options.

FSA has also taken important steps to adapt its programs to meet common challenges faced by historically underserved as well as new customer groups, such as limited access to credit and insurance. It has modified existing loan programs, offering smaller loan amounts (microloans) with less stringent credit requirements and has expanded access to disaster assistance for non-insured crops. Also, the agency has taken action to improve outreach to historically underserved customer groups, such as working with independent third parties that can help reach communities that FSA cannot due to legacies of distrust. In addition to the adaptation and expansion of programs and outreach, accountability has been strengthened by the Congressional mandate requiring a receipt for service for all transactions with FSA. This requirement is now a feature of the customer relations management technology platform that underpins FSA’s Bridges to Opportunity initiative.

The loss of experienced employees to retirement over the next few years presents FSA with the possibility of increased workloads and the likely loss of institutional knowledge if new employees cannot be hired and trained before existing employees retire. A more complex customer service environment will demand more sophisticated training and management to supplement on-the-job training and mission commitment upon which the agency has relied to meet the simpler service delivery demands of the past. In addition to managing the day-to-day demands of service delivery, FSA will need to be able to effectively manage new initiatives over time in response to changing technology and customer service needs and delivery preferences.

FSA is undertaking a range of initiatives that promise to significantly improve customer service and outreach. However, the agency’s ability to successfully institutionalize these initiatives and to respond effectively and efficiently to change over time is likely to be hindered by the lack of an integrated, agency-wide approach to customer service. Currently, responsibility and authority for customer service within FSA headquarters is fragmented, there is a lack of continuity in senior level positions with significant responsibilities related to customer service, and processes for collecting and analyzing data and using results to improve customer service are not in place. Effective and efficient adjustment also requires the ability to anticipate possible changes. This is especially important at this time when agriculture is experiencing disruptive changes in modes of production, marketing, and financing. However, there is no one official at FSA responsible for monitoring developments and trends in agriculture to identify possible implications for FSA programs, service delivery and outreach.
The Panel makes recommendations for a strategy for FSA to strengthen its capacity to improve and sustain a high level of customer service in a changing environment. These recommendations are organized around five major objectives:

1. Improve the efficiency and quality of in-person service delivery, while developing online/self-service delivery options.
2. Adapt programs, delivery and outreach to meet the needs of historically underserved and new/beginning producers.
3. Institutionalize an integrated agency-wide approach to customer service.
4. Build workforce capacity and skills.
5. Improve workload analysis/staffing model capabilities.

The first four objectives are addressed in the main text of this report. Analysis and recommendations related to the fifth objective, to improve workload analysis/staffing model capabilities, were presented to FSA leadership in December, 2015. The Panel's assessment of FSA's workload analysis and related recommendations are presented in Appendix E.

<table>
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<tr>
<th><strong>Objective 1: Improve the efficiency AND quality of in-person service delivery, while developing online/self-service delivery options.</strong></th>
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<td>The Panel makes recommendations to strengthen FSA's existing initiatives and develop strategies for upgrading its IT infrastructure, adjusting its field office footprint and developing online/self-service delivery options.</td>
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| **Recommendation 1:** | FSA should work with RMA to ensure that a common set of acreage and crop information is collected by FSA's local service center staff and RMA-authorized insurance providers. |
| **Recommendation 2:** | FSA should work with RMA to identify ways to avoid imposing additional crop reporting deadlines on multi-crop producers. |
| **Recommendation 3:** | To increase the efficiency of its in-person service delivery, FSA should take steps to improve the speed and reliability of the IT infrastructure supporting field offices. |
| **Recommendation 4:** | FSA should take advantage of its ongoing review of compliance activities in response to the 2014 OIG report to identify additional opportunities to reduce customer compliance workload through improved integration and risk management practices. |
| **Recommendation 5:** | FSA should continue its efforts to develop a framework that clearly sets out responsibilities at the national and state office level for managing the development and maintenance of information packages to be included in the Bridges electronic library that will guide employee assistance and referrals to customers. |
**Recommendation 6:** FSA should develop a framework to guide continued development of Bridges following the completion of Phase 3 to help ensure that further investments continue to add value in the context of FSA’s broader set of customer service efforts.

**Recommendation 7:** In support of a request to Congress for discretion to adjust the field office footprint, FSA should develop a plan making the case for adjustments and laying out the criteria and processes (including public hearings) that would guide adjustment decisions.

**Recommendation 8:** In the longer term, once the current features of Bridges have been fully implemented, FSA should consider contracting with its vendor for training on the CRM software platform in order to more fully understand its capabilities. These might include customer data analysis capabilities not currently part of the software license.

**Recommendation 9:** FSA should develop a strategy for assessing potential investments in online service delivery options to complement in-person service delivery. These should include: (1) a regular survey of customers to systematically assess customer preference for online service delivery and change over time; (2) regular review of available data on internet access in FSA local service areas; (3) assessment of service delivery activities to identify those offering the most promise for online delivery.

**Objective 2: Adapt Programs, Delivery and Outreach to Meet the Needs of Historically Underserved and New/Beginning Producers.**

The Panel makes recommendations for continued improvement in microloan program delivery and outreach, additional resources supporting outreach, and clarification of USDA/FSA roles and responsibilities for new/beginning producer outreach.

**Recommendation 10:** FSA should continue its efforts to change the organizational culture in the field (e.g., training and internal reviews) to help ensure the successful implementation of the microloan program. This might be supplemented by providing a mechanism for gathering input from the field on how the process might be further refined to address any issues that have arisen during implementation.

**Recommendation 11:** FSA should continue its efforts to adapt the Farm Storage Facility Loan program microloan option and streamline the application process.

**Recommendation 12:** FSA should provide budgetary and other resources needed to continue or renew the use of paper newsletters by local service centers to ensure that customers receive the information they need to participate in FSA programs. Recognizing the reality of budget constraints, resources should be allocated to local service centers based on an assessment of relative need (e.g., size of customer population without internet access).
**Recommendation 13:** FSA should consider seeking additional funding for travel to enable local service center staff to conduct needed outreach. In particular, consideration should be given to additional funding for vehicles (agency and/or rental). A funding request concerning vehicles should be based on an assessment of gaps in the current sharing arrangements with co-located NRCS offices and the unmet service delivery and outreach needs.

**Recommendation 14:** FSA should take additional steps to communicate its outreach strategy for microloans to stakeholders, including focus, key actions, performance measures/goals and progress on meeting performance goals.

**Recommendation 15:** FSA should make available examples of completed loan applications to assist customers in the process.

**Recommendation 16:** FSA should work to clarify the roles and responsibilities of agency staff and Department-level staff, housed in the Administrator’s office, regarding outreach to new and beginning farmers and ranchers.

### Objective 3: Institutionalize an Integrated Agency-wide Approach to Customer Service

The Panel makes major recommendations to address current weaknesses expected to hinder the ability of FSA to adapt effectively and efficiently to a changing service delivery environment. These include fragmented responsibility and authority for customer service related activities, a lack of continuity in senior agency positions with pertinent significant customer service related responsibilities, and the lack of established process for collecting, analyzing data and acting on the results to improve customer service.

**Recommendation 17:** To help ensure an integrated, consistent approach to customer service across the agency, FSA should assign clear responsibility and authority for overseeing major customer service related activities to a senior agency official, reporting directly to the Administrator. Also, FSA should strongly consider assigning this responsibility to a career official to help ensure sustained focus over time.

**Recommendation 18:** FSA should continue to develop its operational plan to include the full range of customer service and outreach related activities and identify the critical linkage among them.

**Recommendation 19:** FSA should develop a policy establishing the process by which customer feedback is analyzed and results fed back into customer service improvement efforts.

**Recommendation 20:** Where referrals are part of the FSA service provided, FSA should administer a customer survey after the partner organization reports customer follow up on the referral or after a set period of time following FSA customer interaction.
**Recommendation 21:** FSA should establish a regular process for soliciting employee input and integrating it into a larger learning process to drive improvement in customer service.

**Recommendation 22:** FSA should assign responsibility for monitoring trends and developments in agriculture (e.g., new modes of production, marketing, and financing) and assessing their implications for FSA’s program, service delivery and outreach. This effort should be undertaken in coordination with other USDA agencies and components to ensure a broad perspective and to tap the diverse expertise available across the Department.

**Objective 4: Build Workforce Capacity and Skills**
The Panel makes recommendations for FSA to utilize existing authorities to enable the timely hiring and training of new employees, establish customer service training for frontline employees, incorporate customer service into the performance plans of frontline employees, and develop a cadre of project/program managers to support change initiatives.

**Recommendation 23:** FSA should take advantage of authorities that will enable hiring and training of new employees in advance of field staff retirements.

**Recommendation 24:** FSA should establish a customer service training program for frontline employees. It should be integrated with training supporting Bridges and other customer service initiatives.

**Recommendation 25:** As new customer service initiatives are implemented, FSA should take steps to adapt the existing customer service component of FSA employee performance plans.

**Recommendation 26:** FSA should take steps to ensure access to experienced project managers needed to support new initiatives over time in response to changing technology and customer service needs and delivery preferences.

**Objective 5: Improve Workload Analysis/Staffing Model Capabilities.**
The Academy Panel completed an assessment of FSA's workload analysis and staffing model development efforts in December 2015, including a set of five recommendations. (The assessment and recommendations are presented in Appendix E.) FSA is currently in the process of pilot-testing a workload analysis and staffing model it has developed incorporating recommendations from the Academy Panel. Also, per Panel recommendations, FSA has established a governance process for overseeing the pilot testing and implementation of the model.
The United States Department of Agriculture (USDA) has been delivering income support, disaster assistance, conservation services and a variety of agriculture loan programs to American farmers and ranchers since the 1930’s and the days of the Great Depression. The Farm Service Agency (FSA) of USDA took on primary responsibility for delivery of many of those services when it was created in 1994, by federal legislation directing consolidation into one agency the functions of three existing USDA agencies: (1) the Agricultural Stabilization and Conservation Service (agricultural price and income support programs, production adjustment programs, and related programs; and some conservation programs—but not those of the Natural Resources Conservation Service), (2) the Federal Crop Insurance Corporation, and (3) the agricultural credit portion of the Farmers Home Administration. FSA continues to administer important crop insurance programs today, even though the Federal Crop Insurance Corporation part of FSA became the Risk Management Agency in 1996.3

Today, FSA administers a wide range of programs and activities that are organized into three major categories:

1. **Farm Programs**, which include
   a. **Income Support and Disaster Assistance**—programs designed to mitigate losses from market events and disasters. These programs are generally referred to as the “Farm Safety Net.”
   b. **Conservation**—programs intended to assist agricultural producers and landowners in implementing practices to conserve soil, water, air, and wildlife resources.

2. **Farm Loan Programs (reimbursable),**4 which include direct loan and loan guarantee programs supporting farm ownership, operations, conservation and disaster recovery. The aim of these programs is to help farmers and ranchers obtain credit when not available from other sources and to provide them with the technical assistance they need to translate this credit into commercial success.

3. **Commodity Operations**, which include overall management, purchase, sale and donation of Commodity Credit Corporation-owned commodities; accounting for loans and commodities; and commercial warehouse activities, to support domestic and international food assistance programs. FSA also licenses and inspects warehouses under the U.S. Warehouse Act.5

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4 These programs are covered under the Agricultural Credit Insurance Fund.
5 The commodity operations and warehouse inspection activities of FSA are outside the scope of the current inquiry.
The programs in the first two of these categories involve direct delivery of services to customers. FSA is one of three USDA agencies that directly deliver services to customers through an extensive, nationwide network of field offices.6 Currently, FSA maintains 2,124 local offices in rural counties across the United States, as well as a State Office in every State and the U.S. territory of Puerto Rico.

FSA’s local service delivery is administered through a dual field structure and workforce unique to the federal government. A County Committee of local farmers and ranchers oversees each county office and hires the County Executive Director (CED).7 The County Committee is selected by the votes of local farmers and ranchers and other local interested parties (e.g., spouses of producers, others “involved in farming”, representatives of corporate producers or local organizations representing underserved farmers or ranchers) in local elections managed by FSA county employees. The CED manages the county office and reports to the county committee. The CED hires the personnel who staff the office, other than those involved in the administration of the farm loan programs. Although paid from federal appropriations, these county office employees are not part of the federal civil service. This system, which traces its roots to the Depression-era Soil Conservation and Domestic Allotment Act of 1935,8 was intended to preserve local input into federal delivery of farm programs in the deeply depressed farm economy of the era.9 With some exceptions, such as the Farm Storage Facility Loan program, Farm Program services are delivered by county office employees.10

Roughly a third of the county offices also house FSA farm loan program staff. These loan officers, who handle all aspects of the Farm Loan Programs, are federal civil service employees with their own reporting structure independent of the CED. Federal Loan Program employees in county offices are supervised by District Directors, who are federal civil service employees. The District Directors oversee multiple county offices and may advise county committees on hiring and performance evaluation of CEDs. The District Directors in each state report to the State Executive Director (SED) for that state, who is a political appointee (technically a “Schedule C” or excepted service employee) named by the Secretary of Agriculture. Members of the state’s Congressional delegation may also be consulted, making an SED subject to change over time. Each state has a State Office, managed by the SED and a State Administrative Officer. There is also a State

6 The other two USDA agencies are the National Resources Conservation Service (NRCS) and USDA Rural Development (RD). Many NRCS offices share space with FSA local offices.
7 Not every county has a county office. FSA offices with service areas covering multiple counties are referred to as Area Offices and are overseen by Area Committees with members elected from voting districts encompassing these counties.
8 Section 8(b)(5)(a) of Public Law 74-46; 16 U.S.C. §590h(b)(5) 1935
10 Responsibility for administering the Farm Storage Facility Loan program in the field is divided between County Office and Farm Loan Program staff. For Fiscal Years 2013, 2014, 2015 and the first half of FY 2016, Farm Loan employees have been completing an average of 35% of all FSFL work. In at least nine states, the FLP staff has exclusive responsibility for the program.
Committee in each State that oversees the activities of the FSA in that State. The members of the State Committee are also appointed by the Secretary of Agriculture each year (again, with nomination assistance from the state’s Congressional delegation). They hear appeals from local farmers and ranchers over disputes about Farm Program benefits.

1.1 Origin and Scope of this Study
In the over twenty years since the creation of FSA, the agency has faced the recurrent challenge of maintaining customer service while reducing its field offices and staff in response to budget constraints and calls for greater efficiency. While FSA successfully carried out a plan to close 125 field offices in 2012, the agency’s most recent proposal to close 250 additional offices was heavily criticized by Congress in 2015:

The budget request did not provide a rationale for the proposed office closures and staffing changes, did not clearly describe the effect of those proposed actions, and did not include a timeline for the implementation that demonstrates how savings could be achieved.\(^\text{n}\)

This criticism prompted Congress to impose a moratorium on further office closures and to direct FSA to undertake a workload analysis. In addition, FSA was directed\(^\text{12}\) to contract with the National Academy of Public Administration (the Academy) for an independent assessment of its workload analysis to include the impacts of the 2014 Farm Bill provisions on workload, as well as to “determine a clear path forward to ensure the agency continues to provide the highest level of customer service.”

Before undertaking a workload analysis, FSA contracted with Deloitte to assess two alternative workload models developed by the agency that might be used in such an analysis. It was agreed that the Academy would review these models and the Deloitte assessment, as well as provide recommendations for pilot testing and implementing the preferred model. This part of the study was completed in December, 2015 and is described in Appendix E of this report.


\(^{12}\) Congressional Record Online at page H9311, 113th Congress, December 11, 2014. The following project is described: “[T]he agreement directs the agency to enter into a contract with an independent third party, the National Academy of Public Administration, and includes $900,000 to conduct [an] independent review of the workload analysis and determine a clear path forward to ensure the agency continues to provide the highest level of customer service. The independent review shall begin within 30 days after completion of the workload analysis by FSA and the review shall be submitted to the Committees no later than one year after FSA has contracted with the third-party entity.”
With regard to the customer service portion of the project, it was agreed that the Academy would provide recommendations for developing a strategy that would address the following objectives:

- Improve and complement FSA’s strong in-person service through targeted technology investments, business process changes and related changes in organizational structure, leaving issues of IT strategy and management to a separate independent assessment;
- Improve FSA’s efforts to reach historically underserved as well as new and emerging customer groups; and
- Address opportunities for reconfiguring the current field office structure to improve customer service and efficiency, while leaving aside any issues related to FSA’s hybrid county office/federal workforce and field structure.

1.2 Methodology
The research and analysis supporting the customer service portion of the study drew on a mix of primary and secondary research including:

- Previous external reviews of FSA, with a particular focus on those related to workload, workforce allocation, and customer service;
- Pertinent background information, such as budget, performance, and workforce data;
- In-person and telephone interviews with FSA employees (headquarters and field); employee groups; external customer/stakeholder groups; other external stakeholders including oversight bodies; and
- Effective practices research.

The study team conducted interviews with agency officials (headquarters and field), employee groups, external customer/stakeholder groups and oversight bodies, including OMB and congressional committees. Interviews were conducted with senior officials at FSA headquarters with significant customer service and outreach related responsibilities. Interviews with field employees, including State Office Directors and staff, County Office Directors, county office employees and loan program staff, were conducted as part of field visits to Nebraska, Oregon, Arizona, and North Carolina. The study team conducted a group discussion with District Directors from across the country while they were meeting in Washington, D.C. The study team also interviewed representatives of all four organizations representing the different field employee groups, including the National Association of FSA County Office Employees; the National Association of Credit Specialists, the National Association of FSA Support Employees, and the National Association of District Directors. The study team interviewed representatives of external stakeholder groups including the Farm Bureau Federation, the National Farmers Union, the Rural Coalition, the Latino Farmers and Ranchers Trade Association, the National Young Farmers Coalition, the Farmer Veteran Coalition, and the Intertribal Agricultural Council. All of the individuals interviewed and their affiliations are listed in Appendix B of this report.
1.3 Organization of the Report
Chapter 2 describes the current state of FSA service delivery to producers, major challenges the agency faces, and ongoing initiatives to improve customer service and outreach. Chapter 3 makes recommendations for a strategy for FSA to strengthen its capacity to improve and sustain a high-level of customer service in a changing environment. These recommendations are organized around five major objectives. The fifth objective is to improve workload analysis/staffing model capabilities. Reliable workload analyses are critical to guide decisions about the number, composition, and efficient allocation of staff to meet customer service objectives as well as mission performance objectives more broadly. The Panel’s assessment of FSA’s workload analysis and recommendations—a separate, but related project deliverable—is presented in Appendix E.
CHAPTER 2: CURRENT STATE OF CUSTOMER SERVICE AND OUTREACH AT FSA

The Panel's discussion of customer service and outreach at FSA is organized into five sections:

1. FSA’s Current Service Delivery Model
2. Challenges/Opportunities and Constraints on Adjustment
3. Initiatives to Improve Customer Service
4. Organization of Customer Service
5. Outreach: Organization and Challenges

2.1 FSA’s Service Delivery Model
FSA’s direct service delivery to customers is undertaken mostly in person by FSA employees at the agency’s 2,124 local service centers and, in many cases, at customer locations. Online/self-service options are limited. Farm Loan programs offer greater online service options than Farm programs, but Farm Loan program delivery remains primarily in-person. For instance, the main loan application can be filled in online, but an office visit is still required to complete the application process.

Major direct service activities that still require in-person interaction include determining qualification and application for Farm Program benefits and acreage and crop information reporting and printing. Customers may need to visit the office multiple times during a year to complete reports because different crops have different reporting deadlines. In the case of Farm Loan Programs, direct service activities that still entail significant in-person interaction, include providing technical assistance to loan applicants, in addition to determining eligibility and completing the application process.

FSA’s Farm Loan Programs (FLP) financing has been limited to small, family sized farms for many years and FLP has provided financing to livestock and non-commodity crop enterprises since the program’s inception. However, until recently, FSA Farm Programs were geared primarily toward large-scale, producers of agricultural commodities supported by Farm Bill legislation. Sometimes referred to as the “Title I Commodities,” they include wheat, feed grains, rice, cotton, oilseeds, dairy, and sugar. There were some, but relatively few, programs FSA was able to offer to producers of other crops or livestock.

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13 FSA field staff sometimes travel to perform program signup off-site to serve customers in more remote areas, as in the case of Native American reservations. In addition, FSA field staff may travel to the customer’s location to verify the information reported in an application.

14 Crops cannot be reported until they are planted, leading to a variety of reporting deadlines corresponding to the variety of crops. Also, FSA independently verifies that crops were planted as reported, requiring deadlines that align with planting and harvesting timeframes for each crop.

15 The reference is to “Title I” of successive Farm Bill legislation, where programs to support these commodities have been found. The definitions of Title I commodities have changed over the many Farm Bills.
2.2 Challenges to FSA’s Service Delivery Model and Constraints on Adjustment

In this section, we discuss developments that have placed growing pressure on FSA’s service delivery model and factors constraining the agency’s ability to adjust its approach.

Challenges to FSA’s Service Delivery Model

FSA’s in-person service delivery model has come under pressure from several developments. These include budget constraints, increasing workload from program expansion, and greater focus on outreach to historically underserved customer groups, new customer needs for assistance, staff retirements, and changes in technology and customer service delivery preferences. Also, FSA has come under pressure to adapt its programs and services to meet the particular needs of historically underserved and new/beginning farmers and ranchers.

Budget limitations

Since its creation in a reorganization of USDA in mid-1990s, FSA has faced the recurrent challenge of maintaining customer service while reducing its field offices and staff in response to budget limitations and calls for greater efficiency. While FSA recently received additional appropriations to help meet personnel needs in the field, the agency is likely to face continued budget pressure along with most other federal agencies.

Program expansion

Successive Farm Bills have created new Farm Programs offerings and expanded eligibility for existing programs. Conservation programs are now available to a broad range of farmers and ranchers. Eligibility for coverage under the Non-insured Disaster Assistance Program (NAP) has been expanded over time to a wide range of crops. The 2014 Farm Bill provided for free coverage under NAP of new and beginning farmers and ranchers. In 2015, an estimated 1,255 new and beginning farmers and ranchers enrolled in the Non-insured Disaster Assistance Program; in total, 2,325 new and beginning farmers and ranchers are enrolled in the program for 2016. This expansion of coverage will likely increase the workload when responding to future disasters. Also, the Farm Loan Program’s creation of the microloan program has brought in new customers. As FSA’s customer base expands, the agency will need to spend more time assisting new customers not familiar with its programs and services.

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16 A major objective of the reorganization was to achieve economies through consolidation and streamlining. A discussion of the structural changes can be found in the FSA publication Farm Service Agency Impacts, 2015, http://www.fsa.usda.gov/Assets/USDA-FSA-Public/usdfiles/AboutFSA/Final_FSA_Impacts_2016.pdf
17 According to the USDA NAP Fact Sheet (December 2014), “Eligible Crops” must be “commercially produced agricultural commodities for which crop insurance is not available” and can, for example, include any of the following: crops grown for food; crops planted and grown for livestock consumption; crops grown for fiber; crops grown in a controlled environment (such as mushrooms); specialty crops, such as honey and maple sap; sea oats and sea grass; sweet sorghum and biomass sorghum; industrial crops grown for manufacturing or renewable biofuel feedstock; value loss crops including aquaculture, Christmas trees and ornamental nursery items; and seed crops where the propagation stock is produced for sale as seed stock, such as grass seed. https://www.fsa.usda.gov/Internet/FSA_File/ma_napfactsheet_2014.pdf
with FSA policies and procedures, at least initially. This is especially the case with beginning farmers and ranchers, who are not only new to FSA, but new to farming.

**Increased focus on outreach to historically underserved and new /beginning farmers and ranchers**

Yet another source of increased workload is increased focus on expanding and improving outreach to historically underserved and new customer groups. Significantly, outreach to these diverse groups requires a substantial degree of customization.

**Field staff retirements**

While workload has been increasing, FSA has been losing experienced employees to retirement and been unable to backfill positions and train new employees prior to retirements. Over the next three years, FSA projects that it will lose a greater percentage of its employees than the federal government average. These retirements pose challenges for maintaining customer service both in terms of increased workload and the loss of institutional knowledge. By FY 2020, 41.4% of the Deputy Administrator for Field Operation’s (DAFO) Federal workforce (primarily Farm Loan Program staff in the field and a small number of Headquarters employees) and 39% of County Office staff will be eligible to retire.19

**Greater demand for online service delivery options**

A recent survey by the American Farm Bureau indicates many young farmers and ranchers use the internet to gather news, agricultural information, and communicate with customers.20 A recent study of internet use among the general population found that 96 percent of those under 30 and 92 percent of those under 50 report using the internet, compared to 81 percent between 50 and 64 and only 58 percent of producers 65 and over.21

**Different service needs of new customers**

To meet the different service needs of historically underserved and new customer groups FSA has been forced to adapt existing programs and think about new types of services. Beginning farmers and ranchers and historically underserved farmers and ranchers have different financing needs and credit challenges, which FSA has sought to meet by adapting its existing loan tools. Unlike large-scale commodity producers that primarily sell to processors and wholesalers, many of FSA’s new customers are smaller producers selling more directly into consumer markets, such as farmers markets and restaurants. Consequently, they are seeking different types of assistance related to marketing as well as new credit options.

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19 FSA, Workforce Profile: Deputy Administrator for Field Operations (State & County), March 2016.
Constraints on Improving In-person and Expanding Online Delivery

FSA is under pressure to improve efficiency in response to increased workload and respond to changing delivery preferences. However, the ability of FSA to improve the efficiency of in-person delivery and to adopt online service delivery is constrained by factors including: legacy IT infrastructure, restrictions on making adjustments to field office structure, program complexity, resistance of older customers to online services, and lack of internet access in some rural areas.

IT infrastructure
The most consistent complaint in our interviews with field staff has been the slowness and unreliability of IT systems supporting field offices that limit the ability of staff to serve customers (e.g., filling out applications for benefits, entering acreage and crop information). Applications either run slowly, taking additional time to complete service activities, or access to the application is not available, forcing employees to take down information from customers manually, thereby reducing time available for customer service overall as information must be entered electronically later. In some cases, lack of system access may require an additional customer visit to complete the transaction at another time. This challenge is long-standing and appeared as one of the top ten comments from employees during listening sessions held by FSA with producers and employees in 2010.22

Restrictions of FSA’s ability to make adjustments to field office structure
With a brief exception during 2012, FSA has been operating under congressional restrictions on office closures. These restrictions impose economic costs in the form of leases on office space. They also foreclose opportunities FSA may have to reconfigure field staff in ways that could enable a fuller range of service at local service centers reducing time spent by the customer despite increased travel due to the closure of offices.

Program complexity and technical assistance requirements
Program complexity is identified as a major factor limiting a move toward online service delivery options in the case of Farm Programs. FSA officials argue that application for many of these programs requires significant assistance from staff, thereby limiting the potential for moving application processes online. Indeed, two companion programs created by the 2014 Farm Bill, referred to as ARC/PLC,23 were considered by Congress to be so complex that it appropriated funds to FSA to hire third parties to develop software tools to assist customers in making decisions about which program to apply for.24

22 In all, FSA held 22 different listening sessions in 10 states. The sessions yielded comments in 4 general categories: 1) Programs/Policies, 2) Communications, 3) Forms, and 4) Training. See generally, Understanding the Challenges of Service Delivery to USDA Producers and Customers, which details the listening sessions conducted by FSA.  https://www.fsa.usda.gov/Internet/FSA_File/1184_usda_list_sessions.pdf

23 “ARC/PLC” stands for “Agriculture Risk Coverage (ARC) & Price Loss Coverage (PLC),” two different forms of revenue loss prevention coverage available to farmers, created by the 2014 Farm Bill legislation.

24 USDA awarded “$6 million to universities and cooperative state extension services to develop online decision tools and other materials and train experts to educate producers about several key farm bill programs.” http://www.usda.gov/wps/portal/usda/usdahome?contentidonly=true&contentid=2014/05/0106.xml
The need to provide customers with technical assistance stems not only from program complexity, but also statutory requirements. The “supervised credit” provision of the statute governing Farm Loan Programs requires FSA employees to work with farmers and ranchers who wish to apply for loans, provide all needed forms, explain program requirements, and assist the farmer to develop a farm business plan if requested by the farmer.” This follows from the general mission aim guiding Farm Loan Programs, which is to not only help ensure that farmers and ranchers have access to credit when other sources are not available, but to help them translate this credit into commercial success.

Resistance from older customers
The common view among FSA interviewees is that older farmers and ranchers are attached to in-person service delivery and are resistant to online delivery options. A review of available demographic data lends support to this view. Among the general population, only 58 percent of those 65 and older are likely to use the internet, significantly less than the 81 percent of adults between 50 and 64. Moreover, rural citizens generally are less likely to use the internet than their urban and suburban peers (78 percent versus 85 percent, respectively). That said, almost 29 percent of principal farm operators are 65 or older.

Lack of internet access in some rural areas
There may be significant opportunities to move toward online delivery in some program areas. However, it cannot substitute for in-person delivery in many rural communities that still lack internet access. This applies both to customer application for benefits and communicating information about services to customers, such as new benefits available and application and reporting deadlines. Discussions with field personnel consistently emphasize the need to maintain (or, in many cases, return to) paper newsletters given the lack of internet access in more remote areas, including American Indian reservations, but also very rural areas of other sections of the country. According to the FCC, 39% of rural Americans still lack access to what the government considers to be advanced telecommunications capability. Also, in some cases, in-person outreach is needed due to illiteracy, or to the fact that while internet access may be available, the producer lacks available access at home or otherwise.

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26 USDA, 2012 Census of Agriculture Highlights, Farm Demographics, ACH12-3/May 2014, p. 2
27 Advanced telecommunications capability is defined, by statute, to be “‘high-speed, switched, broadband telecommunications capability that enables users to originate and receive high-quality voice, data, graphics, and video telecommunications using any technology.’” FCC, 2016 Broadband Progress Report, pg. 7 & 14, January 29, 2016 https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-6A1.pdf
These challenges and constraints suggest that FSA is obliged to maintain traditional service delivery approaches, while expanding online/self-service options. At the same time, the agency will need to modify its programs and services to meet the different needs of new customers and balance the workload demands of serving established, underserved and emerging customer groups.

2.3 Initiatives to Improve Customer Service

FSA is undertaking several important initiatives that promise to improve the efficiency and quality of in-person service delivery, develop online delivery options, and adapt programs to meet the needs of historically underserved and new customer groups. The origin, aims, and status of each is discussed below.

- Acreage and Crop Reporting Streamlining Initiative
- FSAfarm+
- Bridges to Opportunity
- Adapting/streamlining Microloan program (Farm Loan Programs)
- Adapting/streamlining Farm Storage Facility Loan program (Farm Programs)
- Improving online delivery of loan programs

**Acreage and Crop Reporting Streamlining Initiative**

USDA had been working to streamline the acreage reporting process for producers since 2009. The Acreage and Crop Reporting Streamlining Initiative (ACRSI) was developed partly in response to input received from customers during a series of listening tours undertaken by FSA across the country during 2010. A top customer comment was that current systems lack the ability to share data between USDA agencies. More specifically, producers reported that they had to report the same acreage and crop data to USDA agencies to participate in programs. They wanted to provide their information just once, and have USDA agencies to share the data among themselves.

ACRSI is a joint project between FSA and the Risk Management Agency (RMA), the two USDA agencies requiring acreage and crop information for participation in their programs. According to the Federal Register notice announcing the initiative in July 2011, the goal of ACRSI is “to establish common data elements and automated processes for producers to report common information for USDA programs, simplify and reduce the reporting burden on producers, and reduce USDA administrative and operating costs by

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30 FSA, Understanding the Challenges of Service Delivery to USDA Producers and Customers, pg. 4, March, 2011; [https://www.fsa.usda.gov/Internet/FSA_File/1184_usda_list_sessions.pdf](https://www.fsa.usda.gov/Internet/FSA_File/1184_usda_list_sessions.pdf)
31 The Risk Management Agency “operates and manages the Federal Crop Insurance Corporation (FCIC) that provides crop insurance to American farmers and ranchers. Private-sector insurance companies sell and service the policies. RMA develops and/or approves the premium rate, administers premium and expense subsidies, approves and supports products, and reinsures the companies.” [http://www.rma.usda.gov/pubs/rme/aboutrma.pdf](http://www.rma.usda.gov/pubs/rme/aboutrma.pdf)
sharing similar data across participating agencies. From a customer service standpoint, the promise of ACRSI was to reduce the time spent by enabling producers to report acreage and crop information required for participation in both FSA and RMA programs only once.

Progress was reported in 2012 on ACRSI streamlining. In 2013, USDA announced that it had consolidated its crop reporting deadlines for producers to 15 dates for submitting these reports, down from the previous 54 dates at RMA and 17 dates for FSA. However, progress on ACRSI was delayed by the troubled development of an IT program called Modernize and Innovate the Delivery of Agricultural Systems (MIDAS). USDA had planned to integrate ACRSI with the MIDAS program. Continuing problems with the development of MIDAS ultimately led USDA Secretary Vilsack to direct that further MIDAS development cease in July 2014. USDA decided not to move forward with plans to include reported crop acreage data in MIDAS and the ACRSI initiative was put on hold. Language mandating ACRSI was inserted into the 2014 Farm Bill at the “prompting of several external groups,” and development of the initiative began again, this time as an independent initiative. It was piloted first (in early 2015) in several counties in Illinois and Iowa, and second (later in 2015) in all counties in 15 states. In March of this year, FSA announced that the program was ready for nationwide implementation, with more than 93% of all acres of cropland reported to FSA now eligible for the common data reporting, representing 13 crops. FSA is reported to be considering additional crops for this initiative.

At this stage of implementation, the capabilities exist for producers to report information once at either a local FSA service center or at the office of an RMA-authorized private insurance provider and have that information shared between agencies for administrative purposes. However, a producer must still visit the other office to sign documents.

36 Ibid.
37 Ibid.
38 Ibid.
41 Those crops include Alfalfa, corn, cotton, CRP, fallow, grass, oats peanuts, rice, rye, sorghum, soybeans and wheat.
Field interviews indicate that, while ACRSI benefits have already been achieved, additional benefits are still in development, consistent with FSA’s plans for interactive and incremental development.

- FSA local service center staff and RMA-authorized insurance providers do not always collect all the information needed by the respective agency programs. Consequently, after reporting information to one agency, farmers must sometimes provide additional information in a separate visit to the other agency.
- In harmonizing its crop reporting deadlines with RMA, FSA shifted a reporting deadline for forage crops from the spring to the fall. This had the effect of imposing more not fewer office visits on some producers, who wish to participate in both FSA and RMA programs.

The longer-term goal is to enable producers to directly upload acreage and crop information from home. However, the current lack of a secure electronic signature capability presents a technical constraint on achieving this goal. Also, staff interviews suggest two possible constraints on the adoption of the direct upload option once the technical capability is in place. One is the discomfort of many older producers with remote submission of information. The other is a preference for hands-on guidance from FSA personnel to make sure submission is correct.

**FSAfarm+**

In addition to ACRSI, which promises to reduce the acreage and crop reporting burden on customers, FSAfarm+, a separate program launched by FSA with authorization in the 2014 Farm Bill, offers to make customer access to their own acreage and crop data more convenient. This program developed functionality that allows operators and owners to view, export and print farm records data, including maps, of their holdings on file at FSA from their own home through a public facing web portal. Direct access permits the operators and owners to electronically share their data, which could include maps, with a crop insurance agent, from their own personal computer.

Access to the web portal requires electronic authorization, for which producers must apply. FSA is continuing to signup producers.

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43 The 2014 Farm Bill mandated that USDA, upon request of the producer, electronically share with the producer (or agent) in real time and without cost to the producer (or agent) the common land unit data, related farm level data, and other producer information for that producer.

44 The FSA webpage that describes the current functionality of FSAfarm+ also notes that a future release will allow access to agents or representatives of farm operators and owners, in addition to allowing other farm tenants access to information related to the land they lease. See generally, [http://www.fsa.usda.gov/online-services/farm-plus/](http://www.fsa.usda.gov/online-services/farm-plus/)

45 Farm+ requires Level 2 E-Authorization security permission. Producers must create a customer profile that includes personal data. Producers must then meet with a Local Registration Authority at a USDA Service Center to prove their identity. See generally, [https://www.eauth.usda.gov/MainPages/eauthWhatIsAccount.aspx](https://www.eauth.usda.gov/MainPages/eauthWhatIsAccount.aspx)
**Bridges to Opportunity**

The Bridges to Opportunity ("Bridges") initiative originated in response to a 2014 directive from USDA Secretary Vilsack calling on FSA to:

- Use its extensive network of local service centers and partnerships to connect rural communities with USDA and other federal agency services
- Help its local service centers connect FSA customers with other agency services and resources they may need

FSA created a task force including State Committee chairs and State Executive Directors to translate the Secretary's directive into action. The task force issued a set of recommendations, including that the initiative be implemented in phases based on pilot tests. The initiative is led by the Deputy Administrator for Field Operations.

This initiative has evolved substantially over time based on experience and a growing appreciation of the opportunities offered by the technology platform being employed in support of the initiative. In keeping with the Secretary's directive, Bridges initially focused on the development of an electronic library that would enable FSA employees to provide customers with information and referrals regarding other USDA services. The initiative now encompasses a broader set of objectives. These objectives and the status of their implementation and related challenges are reviewed below:

- Provide an electronic resource to help employees provide customers with information that can meet needs beyond those addressed by FSA’s programs
- Enable effective customer referrals to partner organizations
- Create a mechanism for collecting customer and partner feedback
- Create a unified electronic record of customer transactions, needs and preferences
- Provide the customer with a receipt for service
- Support outreach, including application for scheduling and tracking outreach activities

**Electronic resource**

The electronic resource objective of Bridges is supported by two components: an online library of information “packages” and information to guide referrals to participating partner organizations.

- Online Library—The aim is to create an electronic library of information “packages" that employees can access to support addressing common questions from customers about services and problems. These packages may include links to existing information available on USDA and other websites, as well as new information developed by staff where existing resources prove insufficient. Also, these packages include information about whom to refer customers to at other organizations for additional information and advice.
Information packages are currently being developed. However, FSA is still refining the roles and responsibilities of FSA headquarters and state office staff in the development of packages and quality control. There is currently an agency steering committee in place comprised of staff from across FSA headquarters components that works to gather and maintain the resource library. This allows staff to focus on areas most pertinent to their mission, while organizing resources in a bundle that includes information from all levels of FSA and beyond. FSA headquarters develops packages of information concerning USDA/FSA policy, as well as approving and coordinating Bridges “Partner” organizations that have agreed to field inquiries from customers referred by FSA. (The referral feature of Bridges discussed below.) State offices help to develop packages related state/local policy and program information (e.g. state agriculture programs), and integrating those programs with national level programs.

To help ensure that information included in the resource library is accurate and current, the steering committee must approve information packages to be uploaded to the resource library. Also, an expiration date is placed on all material going into the resource library. Material is reviewed regularly by the steering committee to ensure that the information is still accurate and current.

- Networking application—Bridges software includes a networking tool, not unlike Facebook. The tool allows field staff to reach out to their colleagues across FSA for advice and information, share successful practices, and provide feedback on Bridges in real time. This is now operational and has become very popular with the field, especially among younger employees. It is seen as more accessible and easier to use than USDA Connect, USDA/FSA’s current networking tool.

**Referral process**

Field personnel have always referred customers to other organizations as appropriate. Bridges seeks to provide systematic support for referrals. It creates a database of organizations and contacts to support employees in making referrals. Also, it facilitates the referral process and helps ensure the usefulness of referrals by establishing formal relationships with organizations. As part of Bridges, FSA has identified organizations willing to participate in a referrals process and created partnership agreements setting out roles and expectations. While local/regional staff focuses on identifying/maintaining Bridges Partners within their regions, authority for entering into partnership agreements is retained by FSA headquarters.

**Customer/partner feedback mechanism**

Initially, the Bridges initiative focused on collecting feedback from customers and partners regarding FSA referrals. Surveys were sent to customers asking them about the usefulness of the referral and the service provided by the partner organization. Surveys were sent to partner organizations asking whether the referral was a good fit with their expertise. Recognizing that surveys could also be used to gather customer feedback on FSA core programs as well, the agency expanded its customer survey in this respect.
Unified transaction record

Customer transactions are locked up in the different program business systems limiting the ability of employees to understand a customer’s history and range of needs. In those offices where Bridges has been implemented, all transactions are now being recorded in the Bridges software, capturing all information about transactions with farmers and ranchers in a single place. This promises to enable a more integrated approach to customer service. Past transactions held in legacy business systems cannot be readily migrated to the Bridges application, but a unified transaction record can be built going forward.

Receipt for service

In response to repeated complaints from farmers and ranchers about the lack of documentation needed to resolve disputes over FSA decisions regarding qualification for program benefits, Congress included a provision in the 2008 Farm Bill requiring FSA to produce a receipt for service upon request. The 2014 Farm Bill required FSA to issue a receipt for service regardless of whether it is requested. Receipts are issued for all “actions taken, not taken, or recommended to the producer or landowner.” The Receipt for Service requirement is incorporated into the delivery of Bridges services. Specifically, “[t]he Customer Summary function within the Bridges software is an enhanced Receipt for Service.” There will be no manual entry for The Customer Summary as all information is automatically populated from the Customer Interaction.

Support for outreach

According to the FSA’s guide to Bridges, success of the initiative “relies upon ongoing outreach to agricultural stakeholders to identify potential Bridges Partners and other sources of valuable agricultural resources.” Also, “Facilitating collaboration between Partners and other stakeholders is the most expansive service provided through Bridges to address concerns or needs of customers and the agricultural community.” Currently, field staff need to consult the Outreach Tracking and Information System (OTIS) in order to view established FSA stakeholders. “OTIS is a software application that supports outreach reporting requirements for National, State and County Office employees.” Field research suggests that a policy is being developed that would replace the current outreach scheduling and tracking applications in OTIS with the Bridges application. FSA hopes to integrate OTIS applications into Bridges during the Phase 3 rollout.

Bridges features discussed above are supported by a Customer Relationship Management (CRM) technology platform under license from Salesforce.com and cloud storage services

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48 Ibid., p. 1
49 Ibid., p. 8
50 Ibid., Par 23, p. 2-7
51 Ibid., Par 4, p. 1-8
52 Ibid., Par 23, p. 2-7
53 FSA, FY 2016 Outreach Tracking and Information System (OTIS) Changes and Enhancements, Notice AO-1638, November 13, 2015
provided by Amazon. The CRM software was developed to meet the particular needs of FSA through an iterative process in close coordination with the FSA pilot team and users. The development was guided by six core requirements:

- **Connect and Communicate** — Have the capability to connect customers with partner organizations through a referral process, making partner organization resources available to customers; allow automatic and user-initiated communication with partners and customers.
- **Access and Share** — Be able to readily access and share information or resources with customers and/or partners; store or access information, resources, and customer and partner contact information.
- **Intuitive and Essential** — Allow user to easily refer customers to partner organizations as an integrated part of the employee’s routine program and service delivery responsibilities; serve as a valuable tool in assisting a wider group of customers beyond traditional FSA customers.
- **Track and Monitor** — Be able to log and track referrals, allow for referral follow-up and service delivery evaluation, enhancement and guidance.
- **Analyze & Evaluate** — Contain analytic components, as well as adaptable reporting functions that facilitate long-term, agency-customer-partner-community network-building and solidarity.
- **Expand & Adapt** — Include the potential to develop public-facing, self-service functionality for customers and partners in a future phase of implementation; adjust to popular and pertinent technological and resource trends.\(^{54}\)

As these core requirements suggest, the CRM software offers a set of broad capabilities that FSA has only begun to tap fully. FSA chose not to purchase training on this software from Salesforce, opting to develop its own training materials. While adequate to the near-term plans for Bridges, there is reason to believe that training by the company might suggest further opportunities offered by the software. Also, the CRM software offers customer data analysis, not included in the current license, that could be used to derive important insights into the service needs and delivery preferences of different customer groups using data collected during interactions.

Bridges has been implemented in three phases. The first phase of the Bridges pilot (October 2014–April 2015) encompassed 12 county offices in five states. It included focused efforts to gather information about the needs of five customer groups in each state:

- **Local and Regional Specialty Crop Producers** – Connecticut, 2 County Offices
- **Commodity Producers** – Minnesota, 4 County Offices
- **Producers who are Veterans** – North Carolina, 3 County Offices
- **New and Beginning Farmers and Ranchers** – Oregon, 1 County Office
- **Historically Underserved Producers** – Texas, 2 County Offices\(^{55}\)

\(^{54}\) Bridges To Opportunity Pilot Summary Report, p. 8
Phase 2 is currently being implemented in 20 states and 195 county offices that service 316 counties. As Phase 2 unfolded, the receipt for service functionality was incorporated into the pilot capability.56

Phase 3 entails the nationwide rollout of Bridges. No official schedule has been announced, but the nation-wide rollout of Bridges is expected to be completed by the end of winter in 2017.

While the nationwide rollout of Bridges may be completed in first part of 2017, it is important to emphasize that the full realization of its potential will depend on continued development of certain capabilities, especially the online library. The usefulness of the online library will increase over time as agency staff refine and extend existing information packages and create new ones based on customer and partner feedback. The development of the online library has no clear endpoint as it potentially extends to address a wide range of customer needs beyond FSA’s and even USDA program offerings and is driven by customer and partner feedback that cannot be anticipated in advance.

The protean scope of Bridges suggests the potential for conflict over resources for the continued enhancement of Bridges and improvements in FSA’s core program services. FSA will need to develop a framework to guide continued efforts following the completion of Phase 3 to help ensure that further investments continue to add value in the context of FSA’s broader set of customer service efforts and that current investments are kept up-to-date.

55 Ibid., p. 6
56 Web Receipt for Service (webRFS) User’s Guide, version 1.1, describes the evolution of the receipt for service requirements. “Section 14003 of the Food, Conservation, and Energy Act of 2008 (2008 Farm Bill) amended section 2501A of the Food, Agriculture, Conservations, and Trade Act of 1990 (7 U.S.C. 2279-1) by adding a provision requiring FSA, NRCS, and RD to provide a receipt, upon request, to any current or prospective producer or landowner requesting a USDA benefit or service. The requirements established by the 2008 Farm Bill were further amended by Section 12204 of the Agricultural Act of 2014 (2014 Farm Bill) to require FSA, NRCS and RD to provide a receipt when a current or prospective producer or landowner requests a USDA benefit or service.”
**Microloans**

The FSA’s microloan program was launched in January 2013. Initially undertaken under existing authorities, the microloan program was authorized by Congress in the 2014 Farm Bill to a maximum of $50,000. FSA The program is intended to provide these groups with easier access to credit. The requirements to obtain a microloan are intentionally less stringent. For example, requirements related to the prior farm experience of applicants are relaxed. Any small business experience or experience as a [farm] apprentice is supposed to qualify as prior farm management experience sufficient to secure a microloan.

Microloans represent 28 percent of the total number of all new direct operating loan commitments made during FY2016 reporting year to date. In 2016, around 70 percent of microloans went to beginning farmers and ranchers. This includes farmers and ranchers who are categorized as socially disadvantaged farmers and ranchers.

![Percent of All New Direct Operating Loan Commitments FY 2016 (as of May 31, 2016)](image)

Source: USDA, Farm Service Agency, *Farm Loan Programs Monthly Management Summary for May 2016.*

Recently, microloan flexibilities were extended to the Farm Loan Programs’ direct farm ownership loan program (published in January 2016) and there are pending changes to apply similar flexibilities to the guaranteed loan program, and to expand the guaranteed loan program to Community Development Financial Institutions to increase program reach to urban and underserved producers in particular.

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Like any new program that departs from established practice, there are bound to be growing pains. According to the 2015 OIG report, FSA field staff found the new requirements concerning microloans challenging, meriting additional guidance and oversight.\(^{59}\) FLP reports conducting its own review and initiating corrective actions before the OIG work was completed as well as continuing internal control reviews and nationwide training sessions to address these concerns. However, study team interviews indicate continuing reluctance among some field staff to apply reduced credit requirements for reasons including concerns over future audits and their perceived obligation to take steps needed to help ensure that farmers and ranchers succeed in keeping with statutory “supervised credit” provisions governing FLP.\(^{60}\) Interviewees expressed the view that due diligence in this regard requires obtaining additional information, thereby limiting the time savings for the customer intended under the microloan program.

The OIG report also concluded that FSA needs to improve its outreach to some of its target audiences. Study team interviews with customer groups indicate that this continues to be an issue.

**Farm Storage Facility Loan Microloan Option**
The Farm Storage Facility Loan (FSFL) program administered by Farm Programs was developed to enable large-scale capital investments such as grain silos. However, FSA has begun to adapt this program to meet the different facility needs of new and beginning farmers and ranchers as well as the credit access challenges shared more broadly by historically underserved groups. FSA has expanded the range of facilities that qualify for financing under the program\(^ {61}\) and developed a microloan option (up to $50,000) appropriate to smaller-scale facility needs. To facilitate credit access, “FSFL security requirements have been eased for all types of loans between $50,000 and $100,000. Loans up to $100,000 can be secured by a promissory note only.”\(^ {62}\) FSA is still in the process of streamlining the application process and loan requirements.

**Improvements in Online Loan Applications**
The main application for loans can be filled out online, but additional forms must be completed and signatures provided in-person. The Farm Loan Program is currently undertaking a project to improve the current online application. As one FSA interviewee

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60 As noted in the OIG report, “FSA is required to work with farmers who wish to apply for loans, provide all needed forms, explain program requirements, and assist the farmer to develop a farm business plan if requested by the farmer.”

61 The FSFL microloan option can be used toward facilities including: grain bins, hay barns and facilities for cold storage. (http://www.fsa.usda.gov/programs-and-services/price-support/facility-loans/farm-storage/)

62 Ibid.
put it, the aim is to develop a more customer-friendly, logic-driven application “similar to TurboTax.”

2.4 Organization of Customer Service
It is often said that customer service is everyone’s business. Indeed, significant customer service-related activities typically are located in different parts of an agency. A formal institutional structure is needed to help ensure an integrated approach to customer service across the agency. This is especially true when, as is the case of FSA, an agency is undertaking multiple change initiatives aimed at improving customer service. FSA is beginning to put elements of such a structure in place, such as an agency operational plan that specifies who is responsible for certain customer service related activities, as well as performance goals and timelines. However, this plan does not yet address the range of customer service related activities and there is no single official with overall responsibility and the authority necessary to oversee and intervene as necessary to ensure coordination and address performance issues.

It is leading practice to have established processes in place to regularly collect information from customers, employees and delivery partners, to analyze this information, and to use the results to improve customer service. In the past, FSA has collected customer and employee feedback only episodically. As part of the Bridges initiative, FSA has begun collecting customer and partner feedback, but processes for analysis and acting on results are still to be established.

It is a time of rapid change and uncertainty in agriculture. In addition to long-standing trends, such as increasing automation and larger scale production, a variety of new developments are afoot. These include new modes of production (e.g., hydroponics, aquaponics, vertical farming), marketing (e.g., farm-to-table), and financing (e.g., venture capital). In short, disruptive forces that have been at work in other parts of the economy are now operating on agriculture.

While it is not clear how these developments will play out, FSA should be monitoring these developments and considering their implications for FSA programs, service delivery, and outreach. Although there is an awareness of these developments among FSA officials, currently, no one within the agency is assigned responsibility to monitor these developments and to assess their implications for FSA.

2.5 Outreach: Organization and Challenges
FSA’s Office of Program Education and Stakeholder Engagement (OPESE), which reports to the Deputy Administrator for Field Operations, is responsible for administering agency-wide outreach activities to farmers, ranchers and stakeholders who can benefit from the

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63 TurboTax is the brand name for a popular form of income tax preparation software. Such software is intended to make complicated tasks, such as preparing and filing tax returns, a simple understandable process. See generally, [https://turbotax.intuit.com/best-tax-software/how-it-works.jsp](https://turbotax.intuit.com/best-tax-software/how-it-works.jsp)
agency’s programs and services. Outreach includes providing information about programs and services and technical assistance to enable access and effective utilization of services.

FSA provides outreach to all customers, but also undertakes targeted activities to increase the effective participation of historically underserved groups. These include:

- Minority farmers/ranchers and landowners/operators (including African-Americans, American Indians, Alaskan Natives, Asian/Pacific Americans, Hispanics), women, and the physically challenged who may need, but have not fully benefited from, USDA assistance;
- New or Beginning farmers and ranchers (including youth and veterans);
- Farmers and ranchers who have not participated in or have received limited benefits from FSA programs that may improve their quality of life, their community and/or the environment;
- Small specialty crop farmers, organic farmers and other farmers with production practices different from most farmers in the area.64

Relationships of trust are critical to effective outreach. In an attempt to bridge legacies of distrust with historically underserved communities, FSA has entered into cooperative agreements with independent third-parties to undertake outreach to farmers and ranchers. historically underserved by USDA programs offered through FSA. Nearly $2.5 million will go to nonprofits, associations, universities, and foundations to provide training and information on FSA programs that provide financial, disaster or technical support. Cooperative agreements between $20,000 and $75,000 are being awarded to organizations headquartered in 28 states, several of whom submitted multi-state or nationwide proposals. Applications for a second round of funding were due July 11, 2016.65

While OPESE administers outreach programs, much of the implementation is undertaken by FSA field personnel in state offices and local service centers. Each of the state offices has an Outreach Coordinator responsible for coordinating FSA outreach activities together with USDA outreach initiatives. Also, outreach is part of District Director and County Executive Director responsibilities.

In addition to OPESE, FSA is home to the USDA’s outreach initiative for new and beginning farmers and ranchers. The director of the initiative reports to the Deputy Secretary of Agriculture, but sits in the office of the FSA Administrator. The USDA initiative includes the establishment of 5 regional new and beginning farmer outreach coordinators.66 The geographical coverage, responsibilities, objectives of these positions are evolving.

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64 These groups targeted for outreach are identified on the USDA website here: http://www.fsa.usda.gov/programs-and-services/outreach-and-education/about-us/index
66 The geographical coverage, responsibilities, objectives of these positions are evolving
Another product of the initiative is a New Farmers website that features advice and guidance on things such as writing a business plan, obtaining a loan, and filing taxes as a new small business owner. According to USDA, “New Farmers [website] has been one of the most accessed websites since inception.” In principle, this website might be considered a complement to the online library and referral features of Bridges. However, it is not clear to what extent the development of the USDA website is coordinated with the development of Bridges.

Our research has identified a variety of challenges facing FSA’s outreach efforts:

- Demands of routine service delivery workload limit the aggressiveness of outreach. More specifically, staff has reported reluctance to encourage applications for new programs such as microloans because it is already stretched by the existing workload.
- Lack of funding for paper newsletters has hindered outreach to many rural communities where customers lack internet access due to a lack of infrastructure or poverty.
- Lack of funding for travel, including access to off-road vehicles, has hindered outreach, especially where distances are greater and terrain is more difficult.
- The respective roles and responsibilities of FSA’s OPESE and Department personnel in the FSA Administrator’s office are not clear with regard to outreach to new and beginning farmers and ranchers.
- Groups representing historically underserved customer groups express frustration with access to microloans and the quality of assistance provided for applicants.
CHAPTER 3: RECOMMENDATIONS FOR A CUSTOMER SERVICE STRATEGY

In this chapter, the Panel makes recommendations to assist FSA in developing a customer service strategy. Recommendations are grounded in leading practice and guidance provided to agencies by the Office of Management and Budget, but adapted to the particular circumstances of the Farm Service Agency. (See Appendix F for a review of leading practice in government customer service and OMB guidance.)

The Panel’s approach seeks to balance competing objectives. FSA must increase the efficiency of service delivery if it is to meet a growing workload. The Panel seeks ways by which FSA can increase efficiency, while maintaining the quality of service and ensuring continued and, in some cases, improved, access to services by all qualified producers. While it is leading practice to move toward more efficient, preferred service delivery channels over time, a public agency must not pursue efficiency at the expense of customer groups that may not have access to these channels. For example, online service delivery offers efficiency and customer convenience, but only for those with reliable, high speed internet access. In addition to increased efficiencies in service delivery, the Panel seeks ways that FSA might reduce its compliance workload to free up staff time for customer service without creating undue risk to program integrity.

One size does not fit all. FSA’s local service centers across the country deliver services to regions and localities that differ greatly in terms of customer mix, service needs and delivery preferences, diversity of agriculture, and travel distances. Accordingly, Panel recommendations seek to provide overall guidance, while preserving the flexibility to adapt to the diverse and changing circumstances of service delivery.

The Panel’s recommendations are organized under five major objectives. The first four objectives are addressed in this chapter. Analysis and recommendations related to the fifth objective, to improve workload analysis/staffing model capabilities, were presented to FSA leadership in December, 2015. The Panel’s assessment of FSA’s workload analysis and related recommendations are presented here and in Appendix E.

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67For example, in its 2011 guidance to agencies, OMB advised that a customer service plan should address a small number of the agency’s highest volume services, including the most critical and significant transactions with customers. While a focus on high-volume services makes sense in terms of achieving the greatest overall impact, it must be complemented by attention to service delivery and outreach activities that may not be high volume, but address agency priorities. In the case of FSA, agency priorities include adapting services and improving outreach to meet the needs to historically underserved and emerging customer groups.
The objectives are as follows:

1. Improve the efficiency and quality of in-person service delivery, while developing online/self-service delivery options.
2. Adapt programs, delivery and outreach to meet the needs of historically underserved and new/beginning producers.
3. Institutionalize an integrated agency-wide approach to customer service.
4. Build workforce capacity and skills.
5. Improve workload analysis/staffing model capabilities.

**OBJECTIVE 1: Improve the efficiency and quality of in-person service delivery, while developing online/self-service delivery options.**

Improving the efficiency of in-person service delivery at FSA’s local service centers is critical to meeting an increasing workload, while continuing to provide high-quality service. The Acreage and Crop Reporting and Streamlining Initiative (ACRSI) and upgrades to increase the speed and reliability of IT infrastructure promise significant improvements in efficiency. In addition to maintaining quality of service by improving efficiency, there are opportunities to significantly improve the quality of customer service on its own. These include the Bridges to Opportunity initiative and possible adjustments to FSA’s current field office footprint. While FSA has taken some steps to expand and improve online delivery in some areas such as Farm Program loan applications, the agency lacks a systematic approach to the development of online/self-service delivery options. The Panel makes recommendations to strengthen FSA’s existing initiatives and develop strategies for upgrading its IT infrastructure, adjusting its field office footprint and developing online/self-service delivery options.

FSA, together with the Risk Management Agency (RMA), has succeeded in achieving the ACRSI objective of enabling the interagency sharing of acreage and crop information reported by farmers. Work continues to fully implement the objective of enabling farmers to report the information only once. Reports from the field indicated that FSA local service center staff and RMA-authorized insurance providers do not always collect all the information needed by the respective agency programs. Consequently, after reporting information to one agency, farmers must provide additional information to the other. It appears that additional coordination is needed between FSA and RMA to ensure that representatives of both agencies collect the same set of information to ensure that farmers need only report once.

**Recommendation 1:** FSA should work with RMA to ensure that a common set of acreage and crop information is collected by FSA’s local service center staff and RMA-authorized insurance providers.

ACRSI has made great progress in its objective of lessening the reporting burden on farmers by reducing the overall number of crop reporting deadlines but in some cases it
may increase it. In harmonizing its crop reporting deadlines with RMA, FSA shifted a reporting deadline for forage crops from the spring to the fall. This had the effect of imposing more not fewer office visits on some producers who wish to participate in both RMA and FSA programs.

**Recommendation 2:** FSA should work with RMA to identify ways to avoid imposing additional crop reporting deadlines on multi-crop producers.

The slowness and unreliability of IT infrastructure supporting in-person service delivery is a long-standing complaint of field staff and an obstacle to improved customer service and efficiency. Upgrades to this infrastructure promise both greater efficiency and improved employee morale. Also, they promise to assist in the task of recruiting new staff from the younger generation that is even less tolerant of antiquated technology.

**Recommendation 3:** To increase the efficiency of its in-person service delivery, FSA should take steps to improve the speed and reliability of the IT infrastructure supporting field offices.

In addition to increased efficiencies in service delivery, an agency may be able to free up staff time for customer service by reducing its compliance workload through the application of a risk management approach. The Panel found that FSA's Farm Programs and Farm Loan Programs (FLP) divisions already take a risk management approach to compliance. To address a 2005 OIG report, Farm Programs instituted National Compliance Reviews (NCRs) to reduce the number of spot checks required to monitor customer compliance with program requirements. FLP has a long standing policy of applying a risk management approach to compliance, setting priorities for year-end analyses, chattel inspections and farm visits. In response to budget constraints, the Farm Loan Programs division issued additional guidance in 2013 on how to prioritize chattel reviews and year-end analyses.

In its 2014 audit, the OIG is concerned broadly with the full range of compliance activities across the agency, with a focus on improving efficiency and effectiveness.

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70 For example, Handbook 1 FLP sets priorities for year-end analyses as opposed to a blanket requirement. 4-FLP provides similar priorities for inspections of chattel security and farm visits.

71 The purpose of a chattel inspection is to confirm that the borrower retains possession of all property listed in the security instrument and that it is properly maintained. The purpose of a year-end analysis is to identify and evaluate significant changes in the borrower's operations, compare actual performance to projections and calculate the variances, and analyze how performance can be improved.

through greater integration. While not focused on reducing customer compliance workload, the OIG recommendations to improve risk management and achieve efficiencies through integration might yield opportunities to further reduce compliance workload. FSA leadership has agreed to develop an overall agency compliance strategy and has established a subgroup within the Executive Leadership Council to oversee the development of this strategy and supporting analyses.

**Recommendation 4:** The FSA should take advantage of its ongoing review of compliance activities in response to the 2014 OIG report to identify additional opportunities to reduce customer compliance workload through improved integration and risk management practices.

While Bridges has potential to improve efficiency by reducing duplication of effort, it appears to offer greater potential for improving the quality of customer service in the form of more and better information for customers, greater consistency of service, and accountability (e.g., receipt for service).

The electronic library feature of Bridges promises to improve the consistency and quality of information that employees provide to customers. However, the quality and accuracy of the information depends on a clearly defined framework governing its development and maintenance. FSA is still in the process of articulating a framework that balances national and state level roles in developing information packages, ensures quality control in the development of packages and their timely updating.

**Recommendation 5:** FSA should continue its efforts to develop a framework that clearly sets out responsibilities at the national and state office level for managing the development and maintenance of information packages to be included in the Bridges electronic library that will guide employee assistance and referrals to customers.

The protean scope of Bridges suggests the potential for conflict over resources for the continued enhancement of Bridges and improvements in FSA's core program services.

**Recommendation 6:** FSA should develop a framework to guide continued development of Bridges following the completion of Phase 3 to help ensure that further investments continue to add value in the context of FSA's broader set of customer service efforts.

Interviews with FSA headquarters and field staff suggest that there are opportunities to significantly improve the quality and efficiency of customer service by consolidating staff and resources in larger, more integrated local service centers. While this would add travel

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73 Agencies undertake to major types of compliance activities: (1) verifying customer compliance with program requirements and (2) verifying employee compliance with agency policies and procedures.

74 The 2014 OIG report finds that FSA's NCRs are too broad (extending beyond customer compliance) and do not always on the areas of greatest risk. It finds also that FSA does not have the capacity to confirm whether prioritized chattel inspections and year-end analyses are being undertaken.
distance for some customers, it would also provide a more robust office able to provide a full range of services during a visit. The Panel believes a case, properly constructed and fact-based, can be made to support improvements in customer service by some consolidation of staff and resources. Currently, however, FSA lacks the discretion to make such adjustments.

**Recommendation 7:** In support of a request to Congress for discretion to adjust the field office footprint, FSA should develop a plan making the case for adjustments and laying out the criteria and processes (including public hearings) that would guide adjustment decisions.

The CRM software platform supporting Bridges offers a set of broad capabilities that FSA has only begin to tap fully. FSA chose not to purchase training on this software from SalesForce, opting to develop its own training. While adequate to the near-term plans for Bridges, there is reason to believe that training by the company might suggest further opportunities offered by the software currently licensed. Also, the CRM software offers customer data analysis, not included in the current license, that could be used to derive important insights into the service needs and delivery preferences of different customer groups using data collected during interactions.

**Recommendation 8:** In the longer term, once the current features of Bridges have been fully implemented, FSA should consider contracting with its vendor for training on the CRM software platform in order to more fully understand its capabilities. These might include customer data analysis capabilities not currently part of the software license.

In-person service delivery must be maintained to ensure access and to provide the assistance needed for certain types of transactions. Still, it is imperative to develop online service delivery options both to respond to growing demand from younger customers and to free up staff time for in-person service delivery in other areas.

FSA has taken important steps to develop and improve online service delivery options—FSAfarm+ and Farm Loan Programs’ efforts to improve online loan application. However, FSA has not systematically considered opportunities for developing online service delivery options.

**Recommendation 9:** FSA should develop a strategy for assessing potential investments in online service delivery options to complement in-person service delivery. These should include: (1) a regular survey of customers to systematically assess customer preference for online service delivery and change over time; (2) regular review of available data on internet access in FSA local service areas; (3) assessment of service delivery activities to identify those offering the most promise for online delivery.
OBJECTIVE 2: Adapt programs, delivery and outreach to meet the needs of historically underserved and new/beginning producers.

FSA uses the term “historically underserved” to encompass new/beginning farmers and ranchers along with a diverse range of other groups such as farmers and ranchers from minority populations and producers of specialty crops. While all these groups may be understood to be historically underserved, the reasons are different. Producers from minority groups were underserved not for lack of programs, but due to racial and ethnic prejudice. That said, these groups do share common challenges such as limited access to credit and insurance. FSA has taken important steps to address these challenges. It has adapted existing loan programs, offering smaller loan amounts (microloans) with less stringent credit requirements and has expanded access to disaster assistance for non-insured crops. Also, the agency has taken action to improve outreach to historically underserved customer groups, such as working with independent third parties that can help reach communities that FSA cannot due to legacies of distrust.

However, significant challenges remain. In addition to the adaptation and expansion of programs and outreach, accountability has been strengthened by the Congressional mandate requiring a receipt for service be issued to customers for all transactions with FSA. As noted earlier, the receipt for service requirement has been integrated into the Bridges customer service platform. The Panel makes recommendations for continued improvement in microloan program delivery and outreach, additional resources supporting outreach, and clarification of USDA/FSA roles and responsibilities for new/beginning producer outreach.

FSA’s Farm Loan Programs Division has implemented a streamlined application process for its Microloan program. However, it is recognized that the successful implementation of this approach will require a change in culture in the field. Toward this end, FLP reports continuing efforts, including nationwide training sessions and internal control reviews to support and reinforce changes. Still, study team interviews indicate that some local service center loan staffs are reluctant to embrace reduced credit requirements as part of the streamlined microloan application process. This stems in part from a concern that they will be penalized in future audits and their belief that they need to continue gathering certain information from applicants if they are to fulfill their perceived obligation under supervised credit mandate to provide the assistance (e.g., business plans) farmers and ranchers need to translate that credit into commercial success.

Recommendation 10: FSA should continue its efforts to change the organizational culture in the field (e.g., training and internal reviews) to help ensure the successful implementation of the microloan program. This might be supplemented by providing a mechanism for gathering input from the field on how the process might be further refined to address any issues that have arisen during implementation.

The Farm Programs Division has created a microloan option as part of the Farm Storage Facility Loan (FSFL) program. Work is underway to streamline the FSFL microloan process.
as well as to amend the list of eligible facilities and equipment to reflect the needs of smaller farming operations.

**Recommendation 11**: FSA should continue its efforts to adapt the Farm Storage Facility Loan program microloan option and streamline the application process.

Paper newsletters are a vital means of communicating information about FSA services in many rural areas where customers lack access to internet due either to the lack of infrastructure in the local area or to poverty. However, until recently, this communication channel was limited due to budget cutbacks.

**Recommendation 12**: FSA should provide budgetary and other resources needed to continue or renew the use of paper newsletters by local service centers to ensure that customers receive the information they need to participate in FSA programs. Recognizing the reality of budget constraints, resources should be allocated to local service centers based on an assessment of relative need (e.g., size of customer population without internet access).

Also, FSA employees must have adequate resources to travel as needed to carry out outreach responsibilities. More specifically, access to off-road vehicles (agency and/or rental) is important to effective outreach, especially where distances are greater and terrain is more difficult. At offices where FSA is collocated with the Natural Resources Conservation Service, sharing arrangements have been used to enable outreach, but conflicting agency work schedules can leave gaps.

**Recommendation 13**: FSA should consider seeking additional funding for travel to enable local service center staff to conduct needed outreach. In particular, consideration should be given to additional funding for vehicles (agency and/or rental). A funding request concerning vehicles should be based on an assessment of gaps in the current sharing arrangements with co-located NRCS offices and the unmet service delivery and outreach needs.

Groups representing historically underserved customer groups have expressed frustration in interviews that FSA’s outreach efforts have been inadequate especially with regard to microloans, which are of particular interest. This may reflect, at least in part, inadequate communication by FSA about its activities and plans in this area. One key stakeholder group expressed frustration with the perceived distancing of FSA from its intention to be the “lender of first opportunity.” However, the FSA strategic plan for FY2012-2016 refers to FSA as the “lender of first opportunity” and this idea was confirmed by FSA staff interviews. This gap between FSA’s intentions and key stakeholder perceptions is one source of frustration that can be eased by better communication.

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**Recommendation 14:** FSA should take additional steps to communicate its outreach strategy for microloans to stakeholders, including focus, key actions, performance measures/goals and progress on meeting performance goals.

One suggestion that came from interviews with these stakeholder groups was that FSA should make available examples of completed microloan applications to help guide customers through the application process. FSA does provide informational assistance regarding microloans. Form 2330- Request for Microloan Assistance\(^{76}\) has an instruction section. Also, the 2014 Farm Bill Fact Sheet on Microloans\(^{77}\) provides detailed information about the program. Applicants can also get hands-on assistance from a program technician in the field office.

**Recommendation 15:** FSA should make available examples of completed loan applications to assist customers in the process.

The respective roles and responsibilities of FSA’s OPESE and Department personnel in the FSA Administrator’s office regarding new/beginning farmer outreach are unclear. This is partly due to the newness and complexity of the USDA initiative. However, going forward roles and responsibilities should be clarified to help ensure effective coordination of outreach to this important customer group.

**Recommendation 16:** FSA should work to clarify the roles and responsibilities of agency staff and Department-level staff, housed in the Administrator’s office, regarding outreach to new and beginning farmers and ranchers.

**Objective 3: Institutionalize an Integrated Agency-wide Approach to Customer Service**

There is little doubt of a strong commitment to customer service at FSA. However, its ability to respond effectively and efficiently to changing technology and customer needs and expectations is hindered by fragmented responsibility and authority for customer service within FSA headquarters, a lack of continuity in senior level positions with significant responsibilities related to customer service, and the absence of established processes for the collecting and analyzing data and using the findings to improve customer service. The Panel makes major recommendations to address each of these gaps as well as refinements to ongoing agency efforts.

It is often said that customer service is everyone’s business. However, a formal institutional structure is needed to help ensure a coordinated approach to improving customer service across the agency. Leading practice emphasizes the importance of having a single, senior

\(^{76}\) FSA, FSA-2330 Request for Microloan Assistance, [http://forms.sc.egov.usda.gov/efcommon/eFileServices/eForms/FSA2330.PDF](http://forms.sc.egov.usda.gov/efcommon/eFileServices/eForms/FSA2330.PDF)

level official with overall responsibility for customer service. Moreover, this official should have sufficient, authority (i.e., reporting directly to the agency chief) and resources (budget and staff) to monitor performance and intervene to address coordination and other problems as they arise.

Many parts of FSA play important roles in supporting customer service, including Field Operations, Farm Programs, and Farm Loan Programs, and the Office of the Chief Information Officer. However, there is no one official at FSA with clear overall responsibility for customer service.

Senior level positions at FSA have been filled with a mix of political appointees and career officials that has changed over time. In the interest of continuity, the Panel believes that the official with customer service responsibility should be a career executive.

**Recommendation 17:** To help ensure an integrated, consistent approach to customer service across the agency, FSA should assign clear responsibility and authority for overseeing major customer service related activities to a senior agency official, reporting directly to the Administrator. Also, FSA should strongly consider assigning this responsibility to a career official to help ensure sustained focus over time.

Because important responsibilities related to customer service generally are distributed across an organization direct authority provides a limited basis for coordination. Therefore, coordination depends heavily on a framework or operational plan specifically for customer service that clearly defines the roles and responsibilities of the different parts of the organization. This should include specific task assignments, together with timelines, and performance goals and measures where possible. Doing so helps provide a sense of ownership and provides the basis for accountability. Still, there must also be a mechanism for ensuring accountability (e.g., sanctions for non-performance).

FSA has completed a general operational plan that includes some customer-service related activities. However, it does not fully capture the range of FSA’s customer service-related activities or draw out the critical linkages between them. Moreover, it does not specify mechanisms for ensuring accountability.\(^7\)

**Recommendation 18:** FSA should continue to develop its operational plan to include the full range of customer service and outreach related activities and identify the critical linkage among them.

Leading practice emphasizes the need for established processes for gathering and analyzing customer feedback and using it to make improvements to customer service. However, input from employees is no less important, given that employees are often in a better position to understand the sources of customer dissatisfaction. While the customer

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7. Mechanisms for accountability are, according to FSA interviews, under development including performance goals for individuals and performance review mechanisms; see email exchange with senior FSA staff.
may register unhappiness with a slow process, employees can provide important insight into why processes are slow and how they might be fixed. Partner feedback is also important where customer service depends significantly on interactions with third party-delivery partners of the agency.

FSA lacks established processes for collecting and analyzing customer feedback and using the findings to improve customer service. As a result, attention to customer service has been episodic. The last systematic effort to collect customer input occurred as part of the listening sessions with producers and field employees held in 2010. FSA is heavily reliant on informal feedback through Congress and anecdotal reporting from the field.

**Recommendation 19:** FSA should develop a policy establishing the process by which customer feedback is analyzed and results fed back into customer service improvement efforts.

As part of the Bridges to Opportunity initiative, FSA has instituted a regular survey of customers and partners (to whom customers are referred for service). However, the survey to customers goes out before customers have used the referral, potentially forfeiting useful customer feedback on the referral.

**Recommendation 20:** Where referrals are part of the FSA service provided, FSA should administer a customer survey after the partner organization reports customer follow up on the referral or after a set period of time following FSA customer interaction.

There is no regular process for gathering employee input. The last systematic solicitation of employee input took place as part of 2010 listening sessions in the field. Field IT reviews are being revived this year after none for some years.

**Recommendation 21:** FSA should establish a regular process for soliciting employee input and integrating it into a larger learning process to drive improvement in customer service.

It is a time of rapid change and uncertainty in agriculture. In addition to long-standing trends, such as increasing automation and larger scale production, a variety of new developments are afoot, including new modes of production, marketing, and financing. In short, disruptive forces that have been at work in other parts of the economy are now operating on agriculture. Although there is an awareness of these developments among FSA officials, currently, no one within the agency is assigned responsibility to monitor these developments and to assess their implications for FSA.

**Recommendation 22:** FSA should assign responsibility for monitoring trends and developments in agriculture (e.g., new modes of production, marketing, and financing) and assessing their implications for FSA’s program, service delivery and outreach. This effort should be undertaken in coordination with other USDA agencies and components to ensure a broad perspective and to tap the diverse expertise available across the Department.
OBJECTIVE 4: Build workforce capacity and skills.

The loss of experienced employees to retirements over the next few years threatens FSA with increased workloads and the loss of institutional knowledge if new employees cannot be hired and trained before existing employees retire. A more complex customer service environment will demand more sophisticated training and management to supplement on-the-job training and mission commitment upon which the agency has relied to meet the simpler service delivery demands of the past. In addition to managing the day-to-day demands of service delivery, FSA will need to be able to effectively manage new initiatives over time in response to changing technology and customer service needs and delivery preferences. The Panel makes recommendations for FSA to utilize existing authorities to enable the timely hiring and training of new employees, establish customer service training for frontline employees, incorporate customer service into the performance plans of frontline employees, and develop a cadre of project/program managers to support change initiatives.

In recent years, FSA has struggled to maintain adequate staffing due in part to a hiring freeze. Also, the agency was unable to hire and train new employees in advance of retiring employees leaving service. However, the situation has been alleviated by increases in funding and staffing ceilings\footnote{With the passage of the 2014 Farm Bill, FSA was given a substantial increase in FTEs to help implement the Farm Bill provisions.} and FSA has identified authorities that promise to facilitate hiring and training in advance of retirements. The Deputy Administrator for Field Operation’s county office staff is currently at 98% of full strength, with the Federal workforce slightly lower at 92% of full strength. Still, retirements pose a challenge for maintaining customer service both in terms of increased workload, and the loss of institutional knowledge. FSA has begun to address this problem by using workforce profiles and field consultations to anticipate where retirements will take place. In addition to the consultations, FSA is considering a number of tools that promise to facilitate hiring and training in advance of retirements.

USDA has undertaken efforts to reform the hiring process as well as improve the training of employees.\footnote{FSA, Revised Hiring Process and Mandatory Training, Notice PM-2960, April, 21, 2016.} Specifically, FSA created a hiring task force to improve the process.\footnote{Ibid., p. 1.} The task force, with guidance from the USDA Assistant Secretary for Administration,\footnote{Several memos were written by Dr. Parham: 1) dated January 14, 2015 \url{http://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=36899.wba} and 2) dated June 24, 2015 (attached to Notice PM-2960) that are directed toward Transforming Hiring in USDA. \url{http://www.fsa.usda.gov/Internet/FSA_Notice/pm_2960.pdf}} has led to a new policy of mandatory training for new managers. Furthermore, FSA has identified authorities that give the agency several different options for the timely hiring and training of new employees. “In an effort to reduce duplication of work and increase efficiency, most federal vacancy announcements will be advertised through delegated examining or merit
promotion, but not both.\textsuperscript{83} FSA has put in place new training policies intended to ensure consistency, minimize duplication of efforts, ensure cost effectiveness, and build a high performing supervisor workforce that can create a positive and productive work environment.\textsuperscript{84}

**Recommendation 23:** FSA should take advantage of authorities that will enable hiring and training of new employees in advance of field staff retirements.

FSA’s local service center staff receives training on the various programs they administer, but have not generally received training in customer service and related tools. Training in customer service and related tools such as a Customer Relationship Management platforms like that used as part of Bridges are necessary to help employees manage increasingly diverse, complex customer interactions more effectively.

**Recommendation 24:** FSA should establish a customer service training program for frontline employees. It should be integrated with training supporting Bridges and other customer service initiatives.

In keeping with leading practice, FSA has incorporated customer service into the performance plans of its employees. However, these should be updated to reflect changes in customer service responsibilities following from ongoing implementation of Bridges.

**Recommendation 25:** As new customer service initiatives are implemented, FSA should take steps to adapt the existing customer service component of FSA employee performance plans.

In addition to managing the day-to-day demands of service delivery, FSA will need to be able to effectively manage new initiatives over time in response to changing technology and customer service needs and delivery preferences. This will require a cadre of staff with training and experience in the disciplines of project and program management.

**Recommendation 26:** FSA should take steps to ensure access to experienced project managers needed to support new initiatives over time in response to changing technology and customer service needs and delivery preferences.

\textsuperscript{83} FSA, *Revised Hiring Process and Mandatory Training*, Notice PM-2960, April, 21, 2016. p. 4
Conclusion
The agricultural sector remains vitally important to the American economy and the world economy. The Farm Service Agency continues to play an extremely important role. However, it is imperative that the agency act aggressively to adapt its approach to service delivery and outreach if it is to continue providing the highest level of customer service in a rapidly changing environment with limited resources. An in-person approach to service delivery will continue to be important to help customers understand complex programs and help them navigate the diverse resources they will need to prosper. However, sustaining this approach will require actions to greatly improve efficiency, while, at the same time, maintaining quality.

Increasingly customers prefer to conduct many transactions online. Online service delivery can enable the delivery of services in ways that are more convenient to customers as well as more efficient. At the same time, FSA must continue to make every effort to ensure access for customer groups that still do not have adequate access to high-speed internet and to ensure that customers receive the technical assistance they need and are entitled to under the law, as under the supervised credit provisions of the statute that governs FSA’s Farm Loan Programs. Still, there is no reason the agency should not pursue the development of online service options where they make sense where they have to potential to address customer demand as well as significantly increase efficiency.

Perhaps most important, FSA must build the organizational capacity to adjust effectively and efficiently over time to challenges and opportunities that will arise. These include changes in policy, such as program changes directed by new Farm Bills, as well as changes in the economy (e.g., new modes of production and marketing) and related changes in the needs and preferences of producers that FSA must serve. It is critical that FSA institutionalize processes for identifying developments and trends and analyzing their potential implications and taking action to modify programs, delivery and outreach.

FSA has taken important steps to adapt to its changing environment. This report presents recommendations that build on these steps and call for additional actions needed to help ensure that the agency can continue to provide the highest level of customer service going into the future. While recognizing the constraints that FSA faces, the Panel urges the agency to move ahead on the report recommendations as aggressively as possible.

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85 According to WTO trade statistics, the US is the world’s largest agricultural exporter, as of 2014 (latest available data), accounting for over 10% of world exports. See WTO International Trade Statistics 2015 at page 77; https://www.wto.org/english/res_e/statis_e/its2015_e/its15_merch_trade_product_e.pdf
APPENDIX A: PANEL AND STAFF

PANEL

Jonathan Breul (Chair).* Adjunct Professor, Georgetown University. Executive Director, IBM Center for The Business of Government, and Partner, IBM Global Business Services. Former positions with U.S. Office of Management and Budget: Senior Advisor to the Deputy Director for Management; Chief, Evaluation and Planning Branch, General Management Division; Senior Management Analyst. Former Senior Grants Policy Specialist, Office of the Assistant Secretary for Management and Budget, U.S. Department of Health and Human Services.

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Michael Lipsky,* Distinguished Senior Fellow, Demos: A Network for Ideas and Action. Former Senior Program Director, Demos: A Network for Ideas and Action; Visiting Professor, Public Policy Institute, Georgetown University. Former Senior Program Officer, Peace and Social Justice Program, The Ford Foundation; Professor, Department of Political Science, Massachusetts Institute of Technology; Assistant Professor, Department of Political Science, University of Wisconsin at Madison.

Sylvester Murray,* Visiting Professor of Public Policy and Administration, Jackson State University. Professor Emeritus, Cleveland State University. Former Professor and Coordinator of Master of Public Administration Program, Savannah State University; Professor of Public Administration, Cleveland State University; Manager, Government Consulting Services, Coopers and Lybrand; City Manager, City of San Diego, California; City Manager, City of Cincinnati, Ohio; City Manager, City of Ann Arbor, Michigan; City Manager, City of Inkster, Michigan.

*Academy Fellow
David Smith,* Consultant, Governing Magazine Institute; Chief Operating Officer, Society of St. Vincent dePaul. Former County Manager, County of Maricopa, Arizona. Former Deputy County Executive, Erie County, New York; Assistant City Manager/Acting Commissioner of Public Works, Yonkers, New York; Counsel to Lieutenant Governor, State of New York; Director of Intergovernmental Relations, Westchester County, New York; Administrative Officer, Orange County, New York; Lieutenant, U.S. Marine Corps Reserve, Vietnam service.

ACADEMY STUDY TEAM

Joseph P. Mitchell, Ph.D., Director of Academy Programs—leads and manages the Academy’s studies program and serves as a senior advisor to the Academy’s President and CEO. He has served as Project Director for past Academy studies for the Government Printing Office, the U.S. Senate Sergeant at Arms, USAID/Management Systems International, the National Park Service’s Natural Resource Stewardship and Science Directorate, and the USDA Natural Resources Conservation Service. During his more than 15 years at the Academy, Dr. Mitchell has worked with a wide range of federal cabinet departments and agencies to identify changes to improve public policy and program management, as well as to develop practical tools that strengthen organizational performance and assessment capabilities. He holds a Ph.D. from the Virginia Polytechnic Institute and State University, a Master of International Public Policy from the Johns Hopkins University School of Advanced International Studies, a Master of Public Administration from the University of North Carolina at Charlotte, and a B.A. in History from the University of North Carolina at Wilmington.

Joseph Tasker, Jr., Project Director—Mr. Tasker began his legal career as a practicing lawyer in both the public and private sectors, litigating antitrust cases for the Federal Trade Commission (6 years) and practicing international trade, intellectual property, and government procurement law for 10 years as an associate and partner in a major DC law firm. In 1990, he opened a Washington government affairs office for a major producer of personal computers. After the company merged with Hewlett Packard in 2000, he became the General Counsel and Senior Vice President of Government Affairs for the Information Technology Association of America (ITAA). After ITAA merged itself out of existence, he has consulted on a number of projects, most recently providing technical trade advice on the expansion of the WTO Information Technology Agreement. Mr. Tasker graduated with a BA in Sociology from the University of Oklahoma and earned a law degree from George Washington University in Washington, D.C.

Pam Haze,* Senior Advisor—Ms. Haze previously served as Deputy Assistant Secretary for Budget, Finance, Performance, and Acquisition at the Department of the Interior (DOI). She has more than 20 years of experience in leadership and management, including 15 years as a senior executive. Ms. Haze forged strong relationships within the Federal branch and with Congress and non-governmental organizations. In 2009 she received the Meritorious Presidential Rank award, in 2012 she received the Distinguished Presidential Rank Award, and in 2012 she received the prestigious Elmer Staats Award for personal and professional standards. Ms. Haze earned a Master's degree and a Bachelors of Science degree from

*Academy Fellow
George Mason University. Ms. Haze became a National Academy of Public Administration Fellow in November 2012.

Jonathan Tucker, Senior Research Analyst—joined the Academy staff in 2004. Dr. Tucker has worked with over fifteen different federal agencies on a wide range of projects including general management and IT management assessments, organizational design, and long-term strategic planning. He holds a PhD in Public Policy from George Mason University, an MS in Science and Technology Studies from Rensselaer Polytechnic Institute and a BA in Public Policy from New College of the University of South Florida.

Matt Gripp, Research Analyst—As a former attorney in private practice, Mr. Gripp holds a Juris Doctor from St. Thomas University School of Law, a Master of Public Administration from The Trachtenberg School at George Washington University and BA in Philosophy from the University of Central Florida. He has served on past Academy projects with the Center for Disease Control, Veterans Benefits Administration, Social Security Administration, and the Office of Management and Budget’s Partnership Fund for Program Integrity Innovation.

Adam Darr, Research Associate—Mr. Darr recently joined the Academy as a Research Associate having previously interned in the summer of 2013. He graduated from Virginia Commonwealth University (VCU) with a B.A. in Political Science and Homeland Security and Emergency Management. Prior to joining the Academy, he interned with the Henrico County Office of Emergency Management as an Emergency Management Specialist where he created a countywide program to facilitate better disaster response and recovery by coordinating monthly meetings for all faith-based organizations within the county. He also spent past summers interning with the Fairfax County Public Schools in the Office of Family and Early Childhood Education. He has worked during two General Assembly Sessions within the Virginia House of Delegates under Delegate Thomas Davis Rust and Delegate Barbara Comstock, respectively.

Eric Christensen, Senior Research Associate—Mr. Christensen graduated from the State University of New York at Albany with a BA in Political Science. After graduation, he served as a Campaign Manager in a mayoral election; interned for US Senator Charles Schumer and volunteered on voter outreach for City Councilman Vincent Gentile in Brooklyn. Eric received his MPA from Cornell University, Cornell Institute for Public Affairs. He is a member of Pi Alpha Alpha national honor society for public affairs and administration. Eric served as a consultant on Rural Regeneration in Haiti while at Cornell University. Eric also interned for Public Policy Solutions, Inc., in San Luis Obispo, CA and was a consultant for Tompkins County Government while at Cornell University. He co-authored and co-edited a report on budgetary priority setting, performance measurement, shared services and charter revision for Tompkins County.

Chloe Yang, Research Analyst—Ms. Yang is a Research Analyst at the Academy. Since joining the Academy in 2009, she has worked on projects with a range of federal agencies, including the Office of Management and Budget, Pension Benefits Guarantee Corporation, Amtrak Office of Inspector General Organization, U.S. Coast Guard, and Government Accountability Office. These projects span the fields of budget, financial management,
strategic planning, intergovernmental collaboration, and performance management. For each of the projects, Ms. Yang provided research and analytical support and was a co-author of each final report. Chloe received her B.A. from Renmin University in China and her M.P.A. from George Mason University. She currently is pursuing a Ph.D. at George Mason University.
APPENDIX B: PARTICIPATING INDIVIDUALS AND ORGANIZATIONS

(Titles and positions listed are accurate as of the time of the Academy's initial contact)

The Study Team interviewed over 100 stakeholders through formal interviews (in person and by phone) and meetings in Washington, DC and FSA Offices in Arizona, Nebraska, North Carolina and Oregon. The Academy would like to thank all of these individuals for their thoughtful insights and contributions to the report.

FARM SERVICE AGENCY HEADQUARTERS STAFF

Anderson, Todd – Agriculture Program Technology Specialist
Beyerhelm, Chris – Associate Administrator for Operations and Management
Blanchard, John – Chief of Staff, Deputy Administrator for Management
Boyd, Barbara – Associate Director of Human Resources, Human Resources Division
Brake, Trina – Field Operations Manager, Deputy Administrator for Field Operations
Cuellar, Cynthia – Outreach Specialist
Diephouse, Greg – Deputy Administrator for Field Operations
Gross, Tonye – Chief of Staff, Chief Information Officer
Hanson, Katina – Chief of Staff, Associate Administrator for Policy and Programs
Hayden, Sharon – Program Analyst, Deputy Administrator for Field Operations
Hill, Latrice – Director of Outreach, Deputy Administrator for Field Operations
Karmen, Bradly – Assistant Deputy Administrator for Farm Programs
Lipton, Adam – Management and Program Analyst, Office of Budget and Finance
McFarland, Lilia – USDA New Farmer and Rancher Coordinator
McGrath, Bob – BPMS Project Manager, Office of Budget and Finance
Mulhern, Thomas – Human Resources Director
Pavone, Matthew – Outreach Specialist
Pfaff, Brad – Deputy Administrator for Farm Programs
Radintz, Jim – Deputy Administrator for Farm Loan Programs
Schafer, Glenn – BTO Program Management Specialist
Schmidt, Mike – Associate Administrator for Policy and Programs

Sekar, Radha – Chief Financial Officer

Thompson, Perry – Director, Operations Review and Analysis Staff

Treese, Linda – Assistant to the Deputy Administrator, Deputy Administrator for Field Operations

Watson, Shayla – Stakeholder Engagement Specialist

Weber McNitt, Lesly – Chief of Staff to the Administrator

FARM SERVICE AGENCY FIELD STAFF

Anderson, John – District Director, South Dakota

Blackmon, Brooke – Program Technician, North Carolina

Brown, Michael – Farm Loan Manager, North Carolina

Burns, Nimasheena – Public Affairs & Outreach Officer, North Carolina

Butsch, Stuart – Farm Loan Officer, Oregon

Camarena, Salvador – Farm Loan Officer, Oregon

Campbell, Jenifer – Farm Loan Officer, North Carolina

Clason, Erin – District Director, Nebraska

Cooke, Deana – Program Technician, North Carolina

Davis III, James – Agriculture Program Specialist, North Carolina

Drumwight, Cindy – Executive Officer, North Carolina

Dufner, Randall – District Director, Minnesota

Dunn, James – District Director, Virginia

Eaves, Mike – Administrative Officer, North Carolina

Etheridge, Bob – State Executive Director, North Carolina

Farland, Phillip – District Director, North Carolina
Fricke, Mark – District Director, Illinois
Fulcher, Adele – County Office Reviewer, North Carolina
Gilland, David – District Director, Kentucky
Goodrich, William – Program Technician, North Carolina
Grubbs, Mark – District Director, Arizona
Herchenback, Bob – District Director, Nebraska
Himmelberger, Julie – District Director, Washington
Holland, Michelle – Chief Program Technician, North Carolina
Hunt, Ryan – GIS Specialist, Arizona
Huserik, Janelle – County Executive Director, Oregon
Huskey, Mike – Farm Loan Chief, North Carolina
Jobe, Greg – District Director, Iowa
Johnson, Calvin – Program Technician, Arizona
Keegan, Kevin – District Director, Iowa
Kimura, Kari – Administrative Specialist/Bridges State Resource Manager, Oregon
Kinnison, Sharon – Farm Loan Chief, Arizona
Kresin, Michael – District Director, Nebraska
Lamas, Grace – Administrative Officer, Arizona
Lochridge, Randy – District Director, Tennessee
LoFaro, Daniel – Administrative Officer, Oregon
Maguire, Jared – County Office Trainee, North Carolina
Mann, Harriet – Senior Loan Officer, Arizona
Martinez, Marlene – Administrative Specialist, Arizona
Masters, Kari – Temporary Program Technician, Oregon
McBride, Len – District Director, North Carolina
McLamb, Thomas – Agriculture Program Specialist, North Carolina
Montaño, Gloria – State Executive Director, Arizona
Moszer, Randa – District Director, North Dakota
Motley, Michelle – District Director, Missouri
Murray, Taylor – Outreach Specialist/Bridges State Coordinator, Oregon
Newhouse, Charles – District Director, Oregon
Nez, Catherine – Program technician, Arizona
Nieman, Scott – Farm Loan Manager, Oregon
Norton, Gregg – County Executive Director, Arizona
Perry, Bob – Farm Loan Chief, Oregon
Pothetes, Debbie – Program Technician, Oregon
Price, Ralph – Agriculture Program Specialist, North Carolina
Riggers, Scott – District Director, Idaho
Rivera, Oscar – District Director, New Mexico
Schlittenhart, Arnie – County Executive Director, Arizona
Schmidt, Bev – Program Technician, Oregon
Statterfieco, Rob – Farm Program Chief, North Carolina
Strickland, S. Kettrell – CED, North Carolina
Stuckey, Brian – District Director, Georgia
Surmeyer, Lora – Farm Loan and Program Technician, Oregon
Wasson, Lance – District Director, Montana
Whetham, Dan – District Director, South Dakota
Willett, Kent – Program Specialist, Oregon
Winklosky, Paul – District Director, Pennsylvania
Wooten, Kevin – County Executive Director, North Carolina
Youngblood, Victor – Agriculture Program Specialist, North Carolina

**CUSTOMER/STAKEHOLDER GROUPS**

Anderson, John – Deputy Chief Economist, American Farm Bureau Federation
Arredondo, Rudy – President/CEO/Founder, Latino Farmers & Ranchers Trade Association
Ducheneaux, Zach – Technical Assistance Program, Intertribal Agriculture Council
Foscolo, Jason – General Counsel, Farmer Veteran Coalition
Goule, Chandler – Senior Vice President of Programs, National Farmers Union
Hanson, Eric – Policy Analyst, National Young Farmers Coalition
Moore, Dale – Executive Directory, Public Policy, American Farm Bureau Federation
Racine, Ross – Executive Director, Intertribal Agriculture Council
Rodger, Will – Director, Policy Communications, American Farm Bureau Federation

**EXTERNAL EXPERTS**

Berenbroick, Phillip – Counsel, Government Affairs, Public Knowledge
Cooper, Andrew – Majority Staff Assistant, House Appropriations Committee
Eleftherion, Anthony – Program Examiner, Natural Resources Division, Agriculture Branch, Office of Management and Budget
Erbach Lucas, Adrienne – Agriculture Branch Chief, Office of Management and Budget
Kamarehei, Adel – Consultant, Accenture
Lane, Michelle – Senior Manager, Deloitte
Leetmaa, Susan – Program Examiner, Natural Resources Division, Agriculture Branch, Office of Management and Budget
Naleszkiewicz, Kris – Analytics Senior Manager, Accenture
Pelekanos, Yanni – Workforce Analytics Service Leader, Deloitte
Scales, Kimberly – Senior Consultant, Deloitte
APPENDIX C: SELECTED BIBLIOGRAPHY


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APPENDIX D: LIST OF CURRENT FSA PROGRAMS AND ACTIVITIES

FSA’s BPMS workload analysis and staffing model, which was the focus of the Panel’s assessment, was developed based on field employee-reported time into the WebTA payroll system. The table on the following page provides information about the programs and activities to which all employees could charge time. These were the programs and activities as of June 20, 2014 and do not reflect the changes following implementation of the 2014 Farm Bill. An example is “ACRE”, the “Average Crop Revenue Election” program, which was replaced by other programs (ARC and PLC). Time spent on these programs was captured under “National Office Authorization 2” or “NOAuthP2,” which also included in the table.

The left-most column of the table, “Program Area or Category,” identifies eight different broad categories. It includes work that FSA employees do for other agencies. It also includes “Commodity Operations” and some other activities that are outside the scope of the present project. The right-most column is headed “to be used by” and it indicates which employees are authorized to record time to a particular activity. So, for example, “Commodity Operations” activity time can be recorded by employees of the Deputy Administrator for Commodity Operations (DACO), the Kansas City Commodity Operations division (KCCO) and other relevant headquarters employees. State office and county office employees are generally not involved in this activity and so are not eligible to record time to it.
<table>
<thead>
<tr>
<th>Program Area or category</th>
<th>Short Description</th>
<th>Long Description</th>
<th>Purpose</th>
<th>To be used by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Commodity Operations</td>
<td>AMS</td>
<td>Agriculture Marketing Service</td>
<td>For reimbursable services provided for programs that facilitate the efficient, fair marketing of U.S. agricultural products. Does not include referendum activity.</td>
<td>DACO, KCCO, and applicable headquarters employees</td>
</tr>
<tr>
<td></td>
<td>DPPSP</td>
<td>Dairy Production Donation Program (formerly Dairy Product Price Support Program from the 2008 Farm Bill)</td>
<td>Created under the 2014 Farm Bill, DPPSP is triggered in times of low operating margins for dairy producers, and requires USDA to purchase dairy products for donation to food banks and other feeding programs.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EAAP</td>
<td>Economic Adjustment Assistance Users/Upland Cotton</td>
<td>CCC will make payments to domestic cotton mills for capital investments.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ELSCOMP</td>
<td>ELS Cotton Special Competitive Provisions Program</td>
<td>To increase exports and maintain competitiveness of ELS cotton in world markets.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>FAS McGv Dle</td>
<td>FAS McGovern Dole</td>
<td>For reimbursable services for the McGovern-Dole International Food for Education and Child Nutrition Program, a global school feeding program promoting education, child development, and food security for some of the world’s poorest children.</td>
<td></td>
</tr>
</tbody>
</table>
|                          | FAS Other         | Foreign Agricultural Service | For reimbursable services provided in support of FAS Market Development, Export, and Food AID Programs. Includes support of the following CCC-funded, FAS-administered programs:  
  • Dairy Export Incentive Program  
  • Emerging Markets Program  
  • Food for Progress Program  
  • Foreign Market Development and Cooperator Program  
  • Local and Regional Purchase Pilot Program  
  • Market Access Program  
  • Technical Assistance for Specialty Crops, Quality Samples Program | DACO, KCCO, OBF, and ITSD employees |
<table>
<thead>
<tr>
<th>Program Area or category</th>
<th>Short Description</th>
<th>Long Description</th>
<th>Purpose</th>
<th>To be used by</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Commodity Operations (Continued)</strong></td>
<td>FNS</td>
<td>Food and Nutrition Service</td>
<td>For reimbursable services that provide children and low-income people access to food, a healthful diet, and nutrition education.</td>
<td>DACO, KCCO, and applicable headquarters employees</td>
</tr>
<tr>
<td></td>
<td>PL480TI</td>
<td>Public Law 480 Title I</td>
<td>For reimbursable services in support of FPA, Title I that provides for government-to-government sales of U.S. agricultural commodities to develop countries on credit or grant terms. (Pub. L. 480 Food for Progress)</td>
<td>DACO, KCCO, OBF, and ITSD employees</td>
</tr>
<tr>
<td></td>
<td>PL480TII</td>
<td>Public Law 480 Title II</td>
<td>For reimbursable services in support of FPA, Title II that provides for donation of U.S. agricultural commodities to meet emergency and nonemergency food needs in other countries. This program is administered by the U.S. Agency for International Development.</td>
<td>DACO, KCCO, OBF, ITSD, and applicable headquarters employees</td>
</tr>
<tr>
<td></td>
<td>WhseCCC</td>
<td>CCC Warehouse</td>
<td>CCC enters into storage agreements with private individuals and companies to allow warehouse operators to store commodities owned by CCC or pledged as security to CCC for marketing assistance loans.</td>
<td>DACO, KCCO, and applicable headquarters employees</td>
</tr>
<tr>
<td></td>
<td>Whse USWA</td>
<td>US Warehouse</td>
<td>Authorizes the Secretary of Agriculture to license warehouse operators who store agricultural products.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Warehouse</td>
<td>Warehouse – Other (2008)</td>
<td>Based off of the previous two programs, it is assumed that Warehouse – Other (2008) is used by DACO, KCCO, and applicable headquarter employees. No documentation to confirm this.</td>
<td></td>
</tr>
<tr>
<td><strong>Conservation</strong></td>
<td>BCAP</td>
<td>Biomass Crop Assistance Program</td>
<td>Matching payments for delivery of eligible material to qualified biomass conversion facilities by eligible material owners. Annual payments to certain producers who enter into contracts with CCC to produce eligible biomass crops on contract acres within BCAP project areas.</td>
<td>State and County Office and applicable headquarters employees</td>
</tr>
<tr>
<td>Program Area or Category</td>
<td>Short Description</td>
<td>Long Description</td>
<td>Purpose</td>
<td>To be Used By</td>
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<td>--------------------------</td>
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</tr>
<tr>
<td>Conservation (Continued)</td>
<td>CRP-Gen</td>
<td>Conservation Reserve Program, General</td>
<td>Landowner enrollment contracts for approved conservation practices. Signup enrollment only during designated signup periods.</td>
<td>State and County Office and applicable headquarter employees</td>
</tr>
<tr>
<td></td>
<td>CRP-Cont</td>
<td>Conservation Reserve Program, Continuous</td>
<td>Same as CRP-Gen, except environmentally desirable land devoted to certain conservation practices may be enrolled at any time.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ECP</td>
<td>Emergency Conservation Payments</td>
<td>Provides emergency funding and technical assistance for farmers and ranchers to rehabilitate farmland damaged by natural disasters and for carrying out emergency water conservation methods in periods of severe drought.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EFRP</td>
<td>Emergency Forestry Restoration Payments</td>
<td>Provides payments to eligible owners of nonindustrial private forest land to carry out emergency measures to restore land damaged by a natural disaster.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GRP</td>
<td>Grasslands Reserve Program</td>
<td>A conservation program that emphasizes support for working grazing operations, enhancement of plant and animal biodiversity, and protection of grassland under threat of conversion to other uses.</td>
<td></td>
</tr>
<tr>
<td>Farmable Wetlands</td>
<td>Farmable Wetlands (2008)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farm Loan Programs</td>
<td>FLPDL</td>
<td>Direct Loans</td>
<td>Farm Ownership, Operating, Emergency, and Youth loans are the main types of loans available under the Direct program.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>FLPGL</td>
<td>Guaranteed Loans</td>
<td>Provides lenders with a guarantee of up to 95 percent of the loss of principal and interest on a loan.</td>
<td></td>
</tr>
<tr>
<td>Income Support and Disaster Assistance</td>
<td>ACRE</td>
<td>Average Crop Revenue Election Program</td>
<td>Provides producers an option to earn payments to protect against declines in market revenue.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>DCP</td>
<td>Direct and Countercyclical Payments</td>
<td>Provides payments to eligible producers on farms enrolled for the 2008 through 2012 crop years.</td>
<td></td>
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<tr>
<td></td>
<td>DELAP</td>
<td>Dairy Economic Loss Assistance Program</td>
<td>Provides a 1-time payment to assist dairy producers who have recently experienced low milk prices and high production costs.</td>
<td></td>
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<tr>
<td></td>
<td>DQPP (2771)</td>
<td>Durum Quality Payment Program</td>
<td>Compensates producers of durum wheat, not to exceed 50 percent of actual cost of fungicides applied to control Fusarium head blight (wheat scab).</td>
<td></td>
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<tr>
<td></td>
<td>ELAP</td>
<td>Emergency Livestock Assistance Program</td>
<td>Provides emergency relief to producers of livestock, honey bees, and farm-raised fish.</td>
<td></td>
</tr>
<tr>
<td>Program Area or Category</td>
<td>Short Description</td>
<td>Long Description</td>
<td>Purpose</td>
<td>To be Used By</td>
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</tr>
<tr>
<td>Income Support and Disaster Assistance (Continued)</td>
<td>FSFL</td>
<td>Farm Storage Facility Loan Program</td>
<td>Provides low-interest financing for producers to build or upgrade farm commodity storage and handling facilities.</td>
<td>State and County Office and applicable headquarter employees</td>
</tr>
<tr>
<td>HWWIP</td>
<td>Hard White Winter Wheat Incentive</td>
<td>For FY 2009 through 2012, to establish a HWW wheat development program, to promote HWW wheat as a viable market class of wheat in the U.S.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LDP</td>
<td>Loan Deficiency Payments</td>
<td>Instead of a commodity loan, eligible farmers may choose to receive marketing loan benefits through LDP’s when market prices are lower than commodity loan rates.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LFDP</td>
<td>Livestock Forage Disaster Program</td>
<td>Provides financial assistance to producers who suffered grazing losses because of drought or fire.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>LIP</td>
<td>Livestock Indemnity Payment Program</td>
<td>Provides assistance to producers for livestock deaths that result from disaster.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MAL</td>
<td>Marketing Assistance Loans</td>
<td>Allows producers of designated crops to receive a loan from the Government by pledging production as loan collateral.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>MILC</td>
<td>Milk Income Loss Contract</td>
<td>Compensates dairy producers when domestic milk prices fall below a specified level.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NAP</td>
<td>Non-Insured Crop Assistance Payments</td>
<td>Provides financial assistance to producers of non-insurable crops when low yields, loss of inventory, or prevented planting occur because of natural disasters.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>QIOP</td>
<td>Quality Incentive Oil Program</td>
<td>Provides quality incentive payments for production of oilseeds with specialized traits that enhance human health.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>RTCP</td>
<td>Reimbursement Transportation Cost Payment for Geographically Disadvantaged Farmers and Ranchers Program</td>
<td>Reimburses geographically disadvantaged producers for a portion of the transportation cost for transporting their agricultural commodity, or inputs used to produce an agricultural commodity, during a fiscal year.</td>
<td></td>
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</tr>
<tr>
<td>SURE</td>
<td>Supplemental Revenue Assistance Payments Program</td>
<td>Provides financial assistance for crop production and/or quality losses because of a natural disaster.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TTPP/TTAP</td>
<td>Tobacco Transition Payment Program</td>
<td>TTPP provides payments to tobacco quota holders and tobacco producers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Area or Category</td>
<td>Short Description</td>
<td>Long Description</td>
<td>Purpose</td>
<td>To be Used By</td>
</tr>
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<td>--------------------------</td>
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</tr>
<tr>
<td>Income Support and Disaster Assistance (Continued)</td>
<td>Other FSA</td>
<td>Other FSA Programs</td>
<td>Shall only be used for the following programs: 2008 Aquaculture Grants, Asparagus Revenue Market Loss Assistance Payment Program, Biofuel Initiative, CAP/Poultry Grants, Dairy Indemnity Payment Program, Feedstock Flexibility, Grassroots Source Water Protection Program, Hazardous Waste Program, Inactive FSA Programs, Reforestation Pilot Program, State Mediation Grants, Sugar Program, Voluntary Public Access Grant and Habitat Incentive Program</td>
<td>State and County Office and applicable headquarter employees</td>
</tr>
<tr>
<td>TAP</td>
<td>Tree Assist Program</td>
<td>Provides financial assistance to qualifying orchardists and nursery tree growers to replant or rehabilitate eligible trees, bushes, and vines damaged by natural disasters occurring on or after January 1, 2008 and before October 1, 2011.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>ALL ISDA</td>
<td>All Emergency/Disaster Programs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NOAuthP2</td>
<td>National Office Authorization 2</td>
<td>The Agricultural Risk Coverage (ARC) and Price Loss Coverage (PLC) Programs provide safety-net protection to eligible landowners on farms and base acres.</td>
<td>As Directed by the National Office (used by State and County Office)</td>
<td></td>
</tr>
<tr>
<td>NOAuthP3</td>
<td>National Office Authorization 3</td>
<td>The Margin protection Program indemnifies dairy producers when the average difference between the USDA national all-milk price and a ratio index falls below a producer’s selected coverage level.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NOAuthP4</td>
<td>National Office Authorization 4</td>
<td>The Cotton Transition Assistance Program provides transition assistance to upland cotton producers because of the repeal of the availability of direct payments, the inapplicability of the Agriculture Risk Coverage and Price Loss Coverage Programs to upland cotton, and the delayed implementation of the Stacked Income Protection Plan for upland cotton producers.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Program Area or Category</td>
<td>Short Description</td>
<td>Long Description</td>
<td>Purpose</td>
<td>To be Used By</td>
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</tr>
<tr>
<td>Mission Enabling and Support</td>
<td>CCC Oper</td>
<td>CCC Operations</td>
<td>Finance, accounting, budgeting, IT, and contracting in support of CCC as a whole and not a specific CCC-funded program.</td>
<td>DADO, KCCO, and applicable headquarters employees</td>
</tr>
<tr>
<td></td>
<td>Common</td>
<td>Common Programs</td>
<td>Selected only when time for an activity cannot be accurately reported to a program or divided between several programs, such as direct and guaranteed loans or general and continuous CRP. Common was developed specifically for use with activities, such as Farm Records, Acreage Reports, signup, and eligibility in relation to new activity payment limitation, AGI, wetland, and sod-swamp activities. Common Programs is distributed among the programs reported for each office.</td>
<td>State and County Office and applicable headquarters employees</td>
</tr>
<tr>
<td></td>
<td>NP</td>
<td>Nonprogram Related</td>
<td>Selected when an activity is not directly related to any FSA programs.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NOAuthP5</td>
<td>National Office Authorization 5</td>
<td>Cotton Ginning Program.</td>
<td>As directed by the National Office (used by State and County Office)</td>
</tr>
<tr>
<td></td>
<td>Leave</td>
<td>Leave</td>
<td></td>
<td>All employees</td>
</tr>
<tr>
<td>Service Provided</td>
<td>AFIDA</td>
<td>Agricultural Foreign Investment Disclosure Act</td>
<td>Requires that a foreign person who acquires, disposes of, or holds an interest in U.S. agricultural land, must disclose such transactions and holdings to the Secretary of Agriculture.</td>
<td>State and County Office and applicable headquarters employees</td>
</tr>
<tr>
<td></td>
<td>CCC Exp</td>
<td>CCC Export Credit</td>
<td>For reimbursable services in support of the export credit guarantee programs for commercial financing of U.S. agricultural exports.</td>
<td>OBF and ITSD employees</td>
</tr>
<tr>
<td></td>
<td>CROPIN</td>
<td>Crop Insurance Reimbursable</td>
<td>Services provided in support of producer’s Crop Insurance Reporting requirement and insurance agents, including providing copies of acreage reports and maps. All services provided in support of RMA, program integrity, spot checks, referrals, audits, and consultations.</td>
<td>State and County office and applicable headquarters employees</td>
</tr>
<tr>
<td>Program Area or Category</td>
<td>Short Description</td>
<td>Long Description</td>
<td>Purpose</td>
<td>To be Used By</td>
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</tr>
<tr>
<td>Service Provided (Continued)</td>
<td>FAS HR</td>
<td>Foreign Agricultural Service for Deputy Administrator of Management Offices only.</td>
<td>For reimbursable services provided by an employee within the Deputy of Administrative Management area for RMA.</td>
<td>DAM</td>
</tr>
<tr>
<td>RMA</td>
<td>Risk Management Agency for Deputy Administrator of Management Offices only</td>
<td>For reimbursable services provided by an employee within the Deputy of Administrative Management area for RMA.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TAAF</td>
<td>Trade Adjustment Assistance for Farmers Program</td>
<td>For reimbursable services to FAS to assist producers of raw agricultural commodities and fishermen with adjusting to a changing economic environment associated with import competition through technical assistance and cash benefits.</td>
<td>State and County Office and applicable headquarter employees</td>
<td></td>
</tr>
<tr>
<td>NOAuthP1</td>
<td>National Office Authorization 1</td>
<td>NRCS support services.</td>
<td>As directed by the National Office(used by State and County Office)</td>
<td></td>
</tr>
<tr>
<td>Activity</td>
<td>Description</td>
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</tr>
<tr>
<td>Admin</td>
<td>Perform general office administrative and overhead tasks. Technical support.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Appeals</td>
<td>Facilitate and/or participate in appeals, requests for reconsideration and mediation. Develop policy and guide implementation of policies and procedures for FSA program appeal process.</td>
<td></td>
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</tr>
<tr>
<td>Budgeting</td>
<td>Formulate and execute budgets.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>CERT-DET ACRES</td>
<td>Accept acreage reports and complete determinations. Process customer’s report of acreage and make acreage determinations.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Civil Rights</td>
<td>Administer civil rights requirements. Implement FSA civil rights and EEO initiatives.</td>
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<tr>
<td>COC Elections</td>
<td>Conduct and support county committee elections.</td>
<td></td>
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</tr>
<tr>
<td>Contracting</td>
<td>Award and manage contracts and/or co-operative agreements. Perform Contracting Officer (CO) and Contracting Officer Technical Representative (COTR), Procurement Technician, Ag Marketing technician roles and/or manage cooperative agreements.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Deepwater Horizon</td>
<td>Perform all activities associated with Deepwater Horizon, whether covered under Reimbursable Agreement or for other purposes. The activity for Deepwater Horizon will be captured differently than any other activity in Activity Reporting System. Any activities that would normally be reported according to the Activity Dictionary under a specific activity, if related to Deepwater Horizon, will be reported in this activity. All activity associated with Deepwater Horizon, including but not limited to travel, training, submitting payroll and travel documentation, meetings, actual assigned duties, contracting, budgeting, finance and accounting, IT development or maintenance, litigation, etc., will be captured in this activity. Initially, all Deepwater Horizon activity will be captured under the NP – Non-Program Category. If in the future, funding is appropriated for relief programs, information will be provided on how to relate the Deepwater Horizon activity to the specific programs.</td>
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</tr>
<tr>
<td>DISC Process</td>
<td>Discover Prices Operations. Provide price discovery mechanisms for commodity.</td>
<td></td>
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</tr>
<tr>
<td>ECON-POL Analysis</td>
<td>Conduct Economic Analysis and Policy. Conduct macroeconomic analysis to support program analysis decisions and budgeting activities.</td>
<td></td>
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<tr>
<td>Emergency Prep</td>
<td>Conduct emergency preparedness services. Developing and monitoring safety programs. Implementing and carrying out disaster recovery activities.</td>
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</tr>
<tr>
<td>ENVIRON COMPL</td>
<td>Perform Environmental Compliance. Complete activities associated with environmental evaluations and compliance.</td>
<td></td>
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<td>Activity</td>
<td>Description</td>
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</tr>
<tr>
<td>EWR PROVREV</td>
<td>Electronic Warehouse Receipt. Electronic Warehouse Receipt provider review.</td>
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</tr>
<tr>
<td>EXTAFF</td>
<td>Conduct external affairs and public relations. Receive and respond to inquiries about FSA relations and its programs from the general public. Conduct legislative affairs. Receive and respond to inquiries about FSA from other Government agencies.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farm Records</td>
<td>Research, establish and maintain farm, farm ownership, and field-use records. Maintain basic farm and customer data.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fin-Acctg</td>
<td>Conduct all finance and accounting activities in support of FSA programs and funds, administrative funds, and other FSA programs through reimbursable agreements.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>FOIA-PA</td>
<td>Processing and responding to FOIA and PA requests, including but not limited to, tracking requests, searching for responsive documents, reviewing and redacting documents, drafting responses, and maintaining administrative files.</td>
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<tr>
<td>GARDEN</td>
<td>Conduct activities in support of the People's Garden Initiative.</td>
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<tr>
<td>GIS</td>
<td>Provide aerial imagery products, and service and produce geospatial information.</td>
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</tr>
<tr>
<td>HR</td>
<td>Tasks relating to benefits, personnel, recruiting, and employee relations services.</td>
<td></td>
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</tr>
</tbody>
</table>
| INTEGRITY        | Program and management integrity and compliance. Review program-wide compliance by FSA. Ensure program eligibility rules are applied throughout FSA. Develop related compliance reports.  
  
  **Note:** customer compliance is reported in Service and Maintenance, Sub-Activity, “Verify Customer Compliance”. |
<p>| IT Development   | Modernize IT Systems. Conduct software and systems development to modernize existing FSA production systems. Develop new IT systems. Develop and support IT vision, mission, and architecture to support business processes. |
| IT OPER-MAINT    | Conduct IT operations and maintenance.                                                                |
| Leasing          | Lease procurement and simplified lease acquisition procedures.                                         |
| Leave            | All types of leave, including but not limited to annual, sick, other leave (admin, holiday), compensation leave used, and credit time used. |
| LCNSE/AGMT       | Warehouse Licensing and Agreement Review                                                               |
| Litigation       | Represent FSA in legal actions – participating in court cases.                                         |
| Manage property  | Manage real and personal property. Complete activities associated with the management of office space and facilities. Complete activities associated with managing vehicle fleet. |
| MEAS Services    | Perform measurement services. Provide “paid-for” measurement services using digital imagery, field visit, or GPS. |</p>
<table>
<thead>
<tr>
<th>Activity</th>
<th>Description</th>
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<tbody>
<tr>
<td>MIDAS</td>
<td><strong>All</strong> activity associated with the MIDAS Project, including but not limited to travel, training, planning and decision-making meetings, contracting, budgeting, finance and accounting, and IT development or maintenance, etc., will be captured in this activity. Exceptions: Activity completed that is not related to the MIDAS Project, such as nonprogram/human resources and all other training, other program activity. Any activity that was developed as part of the MIDAS Project, but has now been implemented shall be reported in the appropriate activity for the task completed, such as when using processes and software developed in the MIDAS Project to make producer's farm or tract changes report time in “Common/Farm Records”.</td>
</tr>
<tr>
<td>NOAUTH-A1</td>
<td>Hispanic and Women Farmers and Ranchers. Tasks relating to Hispanic and women farmers and ranchers whose applications for loan or loan servicing assistance may have been denied by USDA for discriminatory reasons, for certain time periods between 1981 and 2000, claims processing activities will continue through FY2014 and possibly into FY2015.</td>
</tr>
<tr>
<td>NOAUTH-A2</td>
<td>Farm Bill. Tasks directly relating to involvement in the Farm Bill development and implementation.</td>
</tr>
<tr>
<td>NOAUTH-A3</td>
<td>Administrative Services Project. Review administrative operations to identify improvements and innovative ideas; actively assist with implementation of projects within FSA or with other agencies.</td>
</tr>
<tr>
<td>NOAUTH-A4</td>
<td>StrikeForce Initiative. All activities related to administering the StrikeForce Initiative targeted toward new customers, or customers who have not participated in FSA programs for an extended period of time, located in identified persistent poverty counties.</td>
</tr>
<tr>
<td>NOAUTH-A5</td>
<td>Receipt for Service. All tasks related to completing receipt for service for current or prospective producers or landowners, who request in person or in writing, any service or benefit according to instructions to be provided.</td>
</tr>
<tr>
<td>Other Agency</td>
<td>Support other government agencies, public and civic other organizations, and private organizations unrelated to any FSA program.</td>
</tr>
<tr>
<td>SUPP</td>
<td></td>
</tr>
<tr>
<td>Outreach</td>
<td>Conduct program outreach. Publicize program to target audience and general public.</td>
</tr>
<tr>
<td>Note:</td>
<td>managing outreach funds are recorded in Budgeting.</td>
</tr>
<tr>
<td>PGM-POL-PLNG</td>
<td>Manage, plan, and perform decision-support work for production, workforce, and operating budgets. Interpret new legislation and develop programs. Interpret new legislation and develop programs. Define and develop the Agency or Organization Strategic Plan and framework.</td>
</tr>
<tr>
<td>Activity</td>
<td>Description</td>
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</tr>
<tr>
<td>SERV and MAINT</td>
<td>Perform payment/repayment processing, record keeping, and customer correspondence. Perform routine maintenance and account reviews. Initiate and perform collections for compliance accounts violations and/or default accounts. Perform delinquent and default activities. Plan and process acquisition or sale of loan collateral. Verify compliance for area including, but not limited to field visits for direct loan servicing activities, land use determinations and referrals, spot checks, and nonacreage determination visits. Perform record checks and field visits to ensure that all crop and field requirements are being met. Acquire, maintain, and dispose of property and equipment received because of default in FSA programs.</td>
</tr>
<tr>
<td>TRANSAC ORIGIN/SIGNUP and ELIGIBILITY</td>
<td>Complete application forms and contracts all the way to an application decision. Includes time spent filling out forms or helping customers complete forms and resolve problems. Determine if customer and farm meet program criteria. Determine credit worthiness and eligibility for loan or contract. Approve or disapprove loan or contract. Prepare and assemble all agreements, disclosures, deeds, instruments, title documents, loan records, lien notices, etc. for signing. Disburse loan funds.</td>
</tr>
<tr>
<td>Training</td>
<td>Design, deliver, or participate in training. Does not include travel to or from training, or cultural diversity training. (See CIVIL RIGHTS.)</td>
</tr>
<tr>
<td>Travel</td>
<td>Schedule and execute travel. Includes time spent planning and in-transit.</td>
</tr>
<tr>
<td>WHSE EXAM</td>
<td>Conduct warehouse examinations, including original, amended, subsequent, and special exams.</td>
</tr>
</tbody>
</table>
APPENDIX E: FSA WORKLOAD ANALYSIS AND STAFFING MODEL DEVELOPMENT

Part I: Panel Assessment and Recommendations

Modern organizational management best practices in both the public and private sectors stress the need for managers to have access to workforce analyses and data-driven staffing models to help them measure workload and make decisions about the size, location, composition and deployment of their workforce.

In addition to its assessment of a number of customer service issues, the Academy has conducted an independent review of the FSA’s workload analysis, as directed by Congress.\textsuperscript{86} The workload analysis assessment was conducted during the first 90 days of the current study. Presentations setting forth the results of the assessment were provided to FSA staff and senior management in December 2015. Since then, FSA has begun implementing the recommendations included in the assessment.

This appendix presents the results of the Academy’s assessment of the FSA workload analysis and explains in some detail both the methodological underpinnings of the workload model as well as the structure and methods of the Academy’s assessment. That assessment includes a review and assessment of an earlier workload analysis assessment conducted by another contractor. The discussion begins with some important background information about FSA and its predecessor agencies and how these matters have been addressed in the recent past, both before and after FSA’s founding in 1994. The Panel describes recent efforts to develop improved workload analysis and staffing models and the results of some independent reviews of those efforts by other organizations. Those reviews are assessed along with the assessment of the model itself. Based on these assessments, findings and recommendations for the FSA going forward are presented.

The Office of Personnel Management (OPM) directs Federal agencies to conduct analyses of human capital needed in order to achieve agency program performance goals.\textsuperscript{87} The Office of Management and Budget (OMB) considers workload analyses to be a basic component of

\textsuperscript{86} Explanatory Statement Accompanying the 2015 Appropriations Act, Congressional Record, 113\textsuperscript{th} Congress, December 11, 2014 (page H9311)

\textsuperscript{87} 5 CFR § 250.203 Personnel Management Regulations, Office of Personnel Management:

(1) \textit{Human capital plan}. Using a format established by agreement between the agency and OPM, at a minimum the plan must include:

(i) \textit{Human capital goals and objectives}. These are a comprehensive, integrated set of human capital goals and objectives. . .

(ii) \textit{Workforce analysis}. This analysis of the agency’s workforce describes its current state, projects the human resources needed to achieve the agency’s program performance goals and objectives during the term of the agency’s strategic plan, and identifies potential shortfalls or gaps. . .

(iii) \textit{Performance measures and milestones}.

\url{https://www.law.cornell.edu/cfr/text/5/250.203} (some details omitted, emphasis supplied)
The U.S. Government Accountability Office (GAO) has often reported on the challenges that have to be overcome when agencies do not have effective workload systems in place to support budget requests and to guide staffing decisions and organizational changes. Workforce analysis capability and workload models are key tools for senior managers when undertaking restructuring and making decisions about the allocation of resources. GAO’s review of the Farm Service Agency’s implementation of the 1996 Farm Bill demonstrates the need for sound workload information on which to base staffing in county offices.

FSA is currently in the process of implementing (pilot-testing) data-driven workload analysis and staffing models it has developed over the last several years. FSA has developed a workload model that generates information to support its annual budget request and evaluate organizational and program performance and capacity. With additional implementation work, FSA's workforce analysis tool will have the capability of being used to assess performance at the county level as well as at the state, and national levels. When fully implemented, the model will be an important tool to manage an organization that administers a diverse array of complex agricultural programs and loan programs through a highly decentralized and geographically dispersed workforce located in over 2,124 county offices. The model being implemented is data driven and efficiently utilizes information collected for other purposes and it is flexible in its ability to incorporate subject matter expertise, as needed. This new model can formulate workload estimates to assist managers to address the requirements of the 2014 Farm Bill and beyond.

Background

FSA and its predecessor agency, the Agricultural Stabilization and Conservation Service (ASCS), have a long history of using work measurement sampling and forecasting to quantify staffing requirements in county offices. Until 2008, FSA (and for many years prior to that ASCS), used a sampling methodology and extrapolated results to estimate workload and staffing needs for county offices nationwide. In 2002, GAO described the methodology in use by FSA at the time:

88 Office of Management and Budget Circular A-11, Section 51.8; see https://www.whitehouse.gov/sites/default/files/omb/assets/a11_current_year/s51.pdf
90Essentially, the 1996 Farm Bill made substantial changes in farm programs, most significantly the elimination of annual farm acreage calculation, replacing it with a 7-year production flexibility contract on which to base annual payments. OMB and USDA projected county office workload would decline as a result. In the course of evaluation, interviewed county office directors believed that in fact workload had increased since 1994 and continued to do so after enactment of the 1996 Farm Act. The GAO investigators, however, could neither confirm nor refute any of these opinions because there was an absence of workload data for analysis. Farm Programs: Impact of the 1996 Farm Act on County Office Workload, August 1997, GAO/RCED-97-214, http://www.gao.gov/archive/1997/rc97214.pdf
91 The model that the Academy reviewed does not produce results at the county office level, but the capabilities are present and the ability can be developed as the model continues to be piloted and implemented. The Panel strongly recommends that this be developed as explained later in this chapter.
For a number of years, FSA has used its work measurement and workload systems
to capture the work performed in county offices and provide a basis for projecting
county offices’ annual needs for staffing and administrative funding. To make these
projections, FSA selects about 6 percent of its county offices (157 of 2,440 offices [in
2002]) to represent county offices nationwide. FSA attempts to include in its 6-
percent sample offices representing different farming practices and commodities, as
well as offices of different sizes. At these offices, FSA records the amount of time
staff spends on each of the over 150 different work activities that define FSA’s
workload. FSA applies these statistical data from the 157 work measurement offices
to the workload units reported by all county offices in order to project staffing needs
for each of the 2,440 county offices nationwide.\textsuperscript{92}

As early as 1979, the Government Accountability Office reviewed this system for work
measurement and found weaknesses in the sampling approach used and specifically
identified problems with the statistical validity of the sample, system controls, the
definitions of work units, documentation of assumptions and decisions about the model,
and validation of workload measurements as compared to actual work completed.\textsuperscript{93} At the
time, ASCS disagreed with many of GAO’s findings and continued to use sampling for
workload measurement.

In 1994 FSA was created, as part of a major Department-wide reorganization, by a merger
of ASCS and the agricultural credit and crop insurance programs of the Farmers Home
Administration. In the years that followed, FSA addressed the GAO-identified weaknesses
and formally implemented an FSA workload measurement system based on sampling,
which was institutionalized in an FSA Handbook.\textsuperscript{94} The key elements of the system
remained as described in 1997: It relied on sampling six percent of the county offices.
Employees in the selected offices recorded time spent, in six-minute increments, using over
150 different work activities. Results of the sample were applied to the workload units
reported by all county offices to project staffing needs. The system was also used to help
distribute staffing reductions resulting from agency restructuring and to meet reduction
targets proposed in the budget, but it continued to have flaws. In 1999 GAO conducted
another review of county offices and found several data limitations. Workload data, for
example, was not collected at all for eight percent of the small county offices. GAO noted the
inconsistencies in data that were caused by programs phased out and introduced by the
Farm Bill and dramatic short-term increases in workload associated with disasters.\textsuperscript{95}

\textsuperscript{92} FARM PROGRAMS, Impact of the 1996 Farm Act on County Office Workload, GAO/RCED-97-214 at 4
\textsuperscript{93} Estimated Personnel Needs of the Agricultural Stabilization and Conservation Service, GAO Report FPCD-
\textsuperscript{94} County Office Workload and Fund Allocation System, FSA handbook, 12-AO, Revision 21 September 20,
2007
\textsuperscript{95} Farm Service Agency: Characteristics of Small County Offices, GAO(1999), GAO/RCED Report-99-162;
\url{http://www.gao.gov/assets/230/227526.pdf}
The FSA workload sampling-based measurement system was terminated in 2008. Since then, working groups within the agency have been developing two different workload analysis and staffing models, neither of which relies on sampling. One, called the 2014S model, was used as the basis to allocate staffing in 2014. The 2014S model used SME-based workload factors for 35 programs as the basis to develop county, state and national workload levels. The workload factors were formulated using four years of program unit information and a sampling of subject matter experts who quantified the time required to conduct key program actions such as processing applications, collecting program participant information, and assessing program eligibility. The model included efficiency factors to differentiate between county offices with small volume and low workload from county offices with large volumes and high workload. In 2015, staffing was allocated proportional to the workload estimates generated by the 2014S model, because staffing ceilings were not sufficient to fully address the workload needs estimated by the model. Since the model was used in 2014/2015, however, it has not been refreshed or updated.

The other model, known as the “BPMS workload analysis and staffing model,” is now being pilot tested and further refined by FSA to quantify workload and workforce needs. The BPMS workload analysis and staffing model uses time recorded by all FSA employees (for purposes of the USDA time and attendance and payroll system and saved to its data warehouse) and program unit outputs to generate performance ratios for each county office. The BPMS workload analysis and staffing model uses three years of historical data collected from systems that are in use for other purposes through processes that are repeatable and auditable. The results that depict the hours it takes to generate a program outcome, such as a farm loan or farm program application vary from one office to another. These data can be used to compare and evaluate county office program performance and can be summarized by state and at the national level. The model utilizes these data presented in a performance ratio and a series of statistical calculations to derive comparable state performance scores for each program. The model accounts for differences in agricultural diversity (e.g., the variety of agricultural crops and livestock operations in the state, disaster frequency, and economies of scale) across states. This diversity factor (a quantitative estimate) is adjusted for each state based on subject matter expertise. In addition, in the absence of data, the 2014 Farm Bill changes were also estimated by subject matter experts. These SME-based adjustments allow FSA to inform model results and help in gaining credibility for the model among state directors and

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96 “SME” is shorthand for “Subject Matter Expert” and is an indication that an expert’s opinion (or the collective opinion of a group of experts) is being relied upon instead of data for some element of analysis, either because the data is not available or does not exist. The 2014S model used subject matter expert opinion to determine how much time it should take to perform a given task and compared that to how much time was recorded to perform the task in a particular office, to determine whether an office was performing above or below expectations. Not all SME is bad, however, as described later in this Appendix.

97 The BPMS staffing model takes its name from this system: The Budget and Performance Management System (BPMS), FSA’s activity reporting and managerial cost accounting system and data warehouse.

98 The 2014 Farm Bill went into effect in 2015, so three years of data are not yet available. This SME approach to the Farm Bill changes will be replaced by timekeeping data for the new programs as they become available over time with continuing implementation of the Farm Bill.
others. A full description of the technical characteristics of the BPMS staffing model can be found Part Two of this Appendix.

The Academy’s Review
Congress directed the Farm Service Agency to contract with the National Academy for an independent review of FSA’s workload analysis. At the time this project was begun, the FSA had already commissioned an Independent Assessment of the two workload models described above by a private contractor. The Academy’s work on the model included:

- Gaining a full understanding of the BPMS workload analysis and staffing model including the current plans and operational capabilities and underlying systems that are the source of data for the model;
- Evaluating the Independent Assessment of the model by the private contractor, which had evaluated the BPMS workload analysis and staffing model and 2014S model based on a set of requirements created by the contractor performing the review; and
- Development of Findings and Recommendations based on direction from the Congress and in consideration of FSA’s current plans and operational capabilities.

FSA’s shift from workload systems that rely on sampling and subject matter expert judgments to systems that rely on recorded data is consistent with GAO’s views that expert opinion is subjective and should be used sparingly, but is useful in the absence of data and provides perspectives not previously considered leading to a better understanding of the programs.99

FSA’s major shift from manual processes to automated systems for capturing financial and program performance data took advantage of changes underway in the larger Federal environment emphasizing data-driven approaches for accountability and performance reporting. Legislation including the Chief Financial Officers Act of 1990,100 the Government Performance and Results Act of 1993 (GPRA)101 and the GPRA Modernization Act of 2010,102 laid the groundwork for USDA deployment of enterprise systems for accounting, payroll, and performance reporting. FSA’s implementation of BPMS as the standard platform for budgetary, financial and performance management information kept pace with these changes and allowed for the efficient use of data collected or other purposes to be used for workload evaluation and workforce modeling. A GAO assessment of managerial cost accounting practices conducted in 2006 highlighted FSA’s implementation of BPMS to link and integrate budget, cost, and performance management information and noted the need

100 Public Law 101-576 (1990)
101 Public Law 103-62 (1993)
102 Public Law 111–352 (2011)
to improve the quality and consistency of nonfinancial data (program unit information). Since that time FSA has implemented BPMS including improved program unit data collection and validation efforts.

FSA’s efforts also track with OMB and OPM requirements for annually presenting budget requests and reporting at the close of the year using data-driven processes and models that can effectively estimate staffing needs relative to agency program and performance goals. FSA has made the decision not to maintain the 2014S model, but instead plans to use the BPMS workload analysis and staffing model going forward.

The Panel’s Approach: Making Findings and Recommendations after Evaluating the Other Contractor’s Independent Assessment of the BPMS Workload analysis and staffing model and 2014S Model

In order to respond to congressional direction to review FSA’s workload analysis, the Panel evaluated the model analysis performed by a contractor to FSA. The study team reviewed work papers, and interviewed federal employees and consultants who were engaged in the initial review.

The other contractor evaluated the BPMS workload analysis and staffing model and the 2014S model based on 22 requirements formulated to capture the expectations of FSA based on interviews and surveys of FSA personnel at the headquarters, state and county level. Results of the analysis using the 22 requirements were quantified with weighted scoring to capture model complexity and results. Model complexity was quantified using a graduated scale with values from high to low for: (1) use of a leading practice, (2) advanced practice, (3) progressing practice, and (4) basic practice. The evaluations of model results were quantified using a graduated scale with values from high to low for: (1) meeting the ideal-state outcome, (2) meeting the expected outcome, (3) meeting a minimum outcome, and (4) failing to meet the requirements.

In the composite scoring based on the requirements set out by the other contractor, the two models were 7 points apart on a 100-point scale: the BPMS workload analysis and staffing model scored 70 and the 2014S model scored 63. Both models scored poorly in meeting strategic requirements: the BPMS workload analysis and staffing model scored 8 and the 2014S model scored 3. The two models scored very closely in meeting core requirements: the BPMS workload analysis and staffing model scored 62 points and the 2014S model scored 60 points.

In the opinion of the Panel, however, the scoring for the models by the other contractor did not adequately consider many of the drivers that led to the development of the BPMS workload analysis and staffing model including especially federal budgetary and financial

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transparency and reporting requirements that require the development of data-driven processes that can produce repeatable, auditable results with information accountable by program and organization and unique and complex requirements for FSA programmatic reporting for the Farm Bill and Commodity Credit Corporation financing. Nor did the scoring consider the degree to which the models had an existing infrastructure for support and ongoing operation and existing documentation.

The scoring also generated lower than expected results for the BPMS workload analysis and staffing model based on data inaccuracies at the time the scoring took place. These are being addressed by FSA with the incorporation of later years of data (which have improved accuracy of the model results) and verification and validation efforts within the development working group. The BPMS workload analysis and staffing model also scored low because the scoring regimen placed emphasis on the model’s inability to quantify staffing need, allocate FTE at the county office level, and benchmark performance. The Panel’s findings and recommendations address these aspects of the model.\textsuperscript{104}

The independent assessment by the other contractor identified critical flaws in both models. Both models were found to have limited scalability for the long term, although the BPMS workload analysis and staffing model has started to scale some functionality. The other contractor’s assessment of other critical flaws is summarized below.

\textsuperscript{104} In short, these are all capabilities that can be developed within the context of the BPMS staffing model and its data collection system, as discussed in the Panel’s findings and recommendations.
Summary of Other Contractor’s Assessment of Critical Flaws in Workload analysis and staffing models

<table>
<thead>
<tr>
<th></th>
<th>2014S</th>
<th>BPMS Staffing</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scalability</strong></td>
<td>Limited*</td>
<td>Limited, with some aspects under development*</td>
</tr>
<tr>
<td><strong>Maturity (repeatable, automated)</strong></td>
<td>Relies on data collected once, independent of existing collection processes*</td>
<td>More mature: Uses data collected for other purposes through processes that are largely automated</td>
</tr>
<tr>
<td><strong>Adjustment for Complexity Factors</strong></td>
<td>Does not adequately assess the workload impact of geographic factors *</td>
<td>Adjustments for geographic diversity, Economy of Scale and Farm Bill are based on subjective inputs *</td>
</tr>
<tr>
<td><strong>Objectivity</strong></td>
<td>Largely based on SME inputs, including benchmarking performance for need-based staffing calculations*</td>
<td>Relies on quantitative adjustment factors to adjust for complexity factors</td>
</tr>
<tr>
<td><strong>Need-based allocation</strong></td>
<td>Yes</td>
<td>No*</td>
</tr>
<tr>
<td></td>
<td>County-level allocation</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Note: Critical Flaws are indicated by *

Despite critical flaws in both models, the assessment by the other contractor, which was reviewed by the Academy, recommended building on the BPMS approach, developing a scalable solution, and designing proofs of concept. The other contractor’s approach was to:

- Start with the BPMS approach and leverage BPMS data structure, data inputs, and calculation approach as the starting point to generate state and county level allocations in an accurate and defensible manner.
- Develop a scalable solution and employ new technologies (for calculation and presentation of results) other than the Microsoft Excel spreadsheet platform that are more scalable, flexible and cost effective in the long term (e.g. solutions using Python, R, or SaaS with user-friendly front-end interfaces such as HTML).
- Design Proofs of Concept and in parallel with the above efforts, conduct a series of proof of concept initiatives using advanced functionality to increase modeling

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105 A “need based allocation” is an allocation that considers full staffing need—the BPMS model in its current form is intended to reallocate existing resources but cannot advise on how much staffing is needed overall.
sophistication. The initiatives should target additional model gaps and address operational efficiencies that would have significant benefit to the organization.

The Panel concurs with this approach to build on the BPMS workload analysis and staffing model, with an immediate pilot test and implementation recommended to take advantage of the model’s capabilities and make it available to FSA State Executive Directors and other executives as soon as practicable. The Panel also concurs with the recommendations to develop a scalable solution and design proof of concept for added functionality, although these are recommended for subsequent initiatives (after the pilot and full agency implementation) to be undertaken by FSA.

The other contractor’s assessment provided eleven detailed recommendations for model improvement. The Panel’s findings and recommendations incorporate those recommendations as appropriate, differentiating among those that FSA should undertake immediately and those that should be considered in later phases of model development. The Panel believes that two of the recommendations, improving data quality and establishing governance processes, impact the performance, credibility, and acceptance of the model and model results and are vitally important and should be addressed as soon as possible.

**Panel Findings and Recommendations**

The Panel’s findings and recommendations consider the results of the other contractor’s review for FSA, augmented by the study team’s in-depth understanding of the BPMS workload analysis and staffing model and an expansive set of interviews. At the time the Academy study team was evaluating the models, FSA had already made the decision to move forward with the BPMS workload analysis and staffing model and was not planning to use the 2014S model. The Panel believes that decision is the correct one. Thus, the Panel’s findings and recommendations address the BPMS workload analysis and staffing model and assume no further work will be undertaken on the 2014S model.

The Panel agreed with the other contractor’s assessment of 2 of the 4 critical flaws in the BPMS workload analysis and staffing model, including:

- **Platform scalability.** The BPMS workload analysis and staffing model currently uses Microsoft Excel spreadsheets as a platform leveraging VBA code. The model is not ready for agency implementation, lacking for example a platform for internet access and interfaces to enable input by multiple users.

- **Determining the number of FTE needed to meet total workload.** The agency needs to be able to quantify staffing requirements to fulfill mission requirements. The language accompanying the 2015 Appropriations Act and prior congressional direction makes it clear that the Congress is eager to get information about the estimated workload required by the 2014 Farm Bill.

On the other hand, the Panel disagrees with the other contractor’s assessment identifying what were characterized as 2 other critical flaws, including the use of some SME judgment
in the BPMS workload analysis and staffing model and the inability of FSA to use the model to allocate staffing at the county office level, as it is currently constituted:

- **The use of SME judgment.** The use of SME judgment in the BPMS workload analysis and staffing model is not a flaw. The use of SME judgment is critical to developing a model that FSA stakeholders find credible. However, SME judgment must be employed in a rigorous and repeatable way. Limited use of SME input has become an acceptable practice. GAO, for example, has stated that expert opinion can be used as a sanity check.\(^{106}\) FSA has gained experience in the use of SME and the use of other approaches to modeling workload by exploring other model approaches.

- **County Staffing.** The Panel recommends that the FSA develop a model, based on the BPMS workload analysis and staffing model, for allocating staff at the county level. The Panel also recommends, however, that this model NOT be used by *headquarters* to allocate staffing at the county level, but to be used by State Executive Directors (SEDs). Moreover, this tool should be accompanied by clear decision-making protocols to guide the use of SED discretion accounting for factors outside the model. This is addressed more fully in the recommendations. The distinction may seem subtle, but the Panel would stress that the difference between having staffing levels at the local level be set locally or at the federal level is a very important one. In this case, local staffing levels should definitely be set at the State level with clear decision-making protocols to ensure consistency and ongoing attention to agency strategic goals focused on new and minority farmers and ranchers, national priorities and the Secretary’s and Director’s areas of emphasis.

**Panel Summary of Best Practices for the FSA Workload analysis and staffing model**
A review of studies considering modeling and workforce analysis provide a set of recommendations for best practices, as follows:

**Stakeholder Engagement:**
- Maintain constant stakeholder involvement throughout the process, especially senior leadership.\(^{107}\)
- Effectively communicate a clear vision of the end-state to promote buy-in (OPM).
- Make the transition plan visible enough to ensure acceptance and understanding; avoid altering the scope of the plan during the process (OPM).
- Implement in stages and avoid an organization-wide implementation (OPM).
- Provide training (OPM).
- Seek continuous feedback from stakeholders to inform the process (OPM).

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Data Quality:
- Establish a process that provides quality controls for data collected and uniformly and accurately analyzes and interprets data (OPM).
- Create the means to collect and synthesize data from multiple sources (OPM).
- Rely on historical data when conducting workforce projections (OPM).

Model Accuracy/Validation:
- Conduct an independent verification and validation of the model, after its completion, to ensure that it satisfies requirements and functions as intended.\(^{108}\)
- Establish a formal, documented plan for reviewing all of the assumptions in the model on a periodic basis to ensure that the assumptions result in staffing allocations that accurately reflect operating conditions that may change over time.\(^{109}\)

Procedures/Governance:
- Establish written procedures for developing and using the model, include procedures to catalog, track and validate data sources (CBP).
- Develop a systematic process to approve changes and additions to the model and periodically evaluate to ensure inputs and assumptions are current and valid (CBP).

Professional Judgment:
- The use of Subject Matter Experts to make management judgments should be used in circumstances where: the staffing for activities or function is a level of effort (e.g. policy, formulation, research), the activities are new or substantially changed; or cost and time constraints will not allow other methodologies.\(^{110}\)

The Panel strongly recommends that FSA follow these best practices as it continues to implement the BPMS workload analysis and staffing model.

Panel findings regarding the BPMS workload analysis and staffing model:
To reinforce the FSA plans to move ahead using the BPMS workload analysis and staffing model, the Panel finds the BPMS workload analysis and staffing model to have significant advantages over the 2014S model given the following:

- The BPMS workload analysis and staffing model uses data generated by enterprise systems that are in place to meet ongoing business needs and does not require a separate stand-alone data collection process.

The BPMS workload analysis and staffing model is a data-driven approach, with an existing infrastructure, partial documentation and standard processes, to quantify workforce, program performance and staffing allocations. The BPMS workload analysis and staffing model uses actual, historical data that is generated by processes that are repeatable and auditable. The BPMS workload analysis and staffing model results can be validated and used by state executives, national program managers and FSA leadership to better understand workload and workload demands. The BPMS workload analysis and staffing model collects data on performance for each county office and can generate state and national metrics for each program, providing a quantifiable measure of performance for comparison and evaluation. Although the BPMS workload analysis and staffing model does not currently generate workforce need estimates or county staffing allocations, the infrastructure is in place to develop these capabilities. The BPMS workload analysis and staffing model is operated and managed by the FSA Chief Financial Officer, who has staff capability and expertise to manage this data-driven process and to work with executives throughout FSA.

Further, the Panel believes that the BPMS workload analysis and staffing model incorporates or has the potential to comply with best practices GAO has identified over the years. In a report for the Department of Justice, GAO identified six leading practices for workload analysis and staffing models that are relevant to FSA’s ongoing efforts, including:

- Account for risk associated with contracting out model development;
- Ensure the credibility of data used in the models;
- Preserve the integrity of data maintained in the models;
- Establish roles and responsibilities for staff assigned to update and operate the models;
- Ensure adequate training for staff assigned to update and operate the models; and
- Leverage stakeholders’ knowledge and experience in designing and developing the models.  

The Panel’s recommendations take these GAO leading practices into account. The Panel’s recommendations provide an immediate path forward for a structured pilot, implementation of the model, and a set of longer-term improvements that can address the requirements of FSA and stakeholders and maximize the potential of this tool to help FSA maintain high levels of customer service. The Panel believes that there is a critical need for FSA to have the tools necessary to develop estimates of workload, effectively allocate staffing and other resources to address highest priority needs, and begin a program of continuous improvement in these areas.

GAO has also established a framework for model design, development and deployment. The Panel believes that FSA should create the environment, consistent with this framework, within which the model can be successful. The user group is the set of field employees that will provide input to the process. Including knowledgeable, capable, interested people at the state and county level (super users) will promote the model and generate feedback on needed improvements.

Additional Panel Recommendations Regarding the BPMS Workload Analysis and Staffing Model:

**Recommendation 1 – Pilot Testing:*** The Panel recommends pilot testing the as soon as possible to enable further development, to optimize use of the model, and realize the investments made to date. The pilot phase should include program components that are needed to improve understanding and acceptance of the model e.g., communication about the model, obtaining the feedback needed to refine the model and training agency personnel in its use.

Neither of the two flaws in the BPMS staffing model acknowledged by the Panel (scalability and staffing need) should delay pilot testing of initial capabilities. These issues can be addressed in subsequent initiatives.

The Panel has identified the following preconditions for successful pilot testing and implementation of the model:

- **A dedicated project management team.** Successful management of the pilot will require the full-time attention of a team of agency personnel familiar with the model and skilled in project management. Agency staff instrumental in managing the development of the model moved to other assignments. FSA has hired new staff that has recently completed training.

- **A senior-level governance process.** There must be a process for engaging senior-level stakeholders in the review and approval of a pilot test plan, the oversight of the pilot test, and final review before implementation. This is critical to obtaining support within the agency as well as a breadth of input to strengthen the model. The Panel recommends that the FSA Executive Leadership Council fill this role (see discussion under Recommendation 2). FSA since created a governance process that includes the Executive Leadership Council.

- **SME Input.** FSA should reconvene a broader group of SMEs to consider the selection and weighting of complexity factors used by application of the model and to validate adjustments to capture the workload impacts of 2014 Farm Bill changes. FSA should employ a more systematic, iterative approach to eliciting SME judgments used in the model and include more than the 10 SEDs initially included, as well as representation from headquarters programs.

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Documentation. FSA should fully document the workload analysis and staffing model proposed for pilot testing. FSA has prepared initial documentation and this, combined with the materials produced by NAPA can help address this need.

The Panel provides direction for a pilot test plan including the following elements:

- **Clear criteria for determining pilot success.** The plan should specify the objectives of the pilot, such as validating the selection and weighting of diversity factors employed in the model.
- **Time frame and milestones.** The plan should identify the timeframe and milestones for the pilot. The pilot can be a 3-4 month trial with results evaluated and used to inform full implementation in preparation for 2017.
- **Clear roles and responsibilities.** The roles and responsibilities of the program management team, the governance board, user groups and other participants should be clearly communicated.
- **Composition of the user group.** Pilot testing should include representative groups of users drawn from across the organization—headquarters and field—and a cross-section of positions. The skilled users will provide valuable input to improve the model on an ongoing basis. At the same time, the user group can help to communicate to the rest of the organization.
- **Training.** Training of user group participants should cover the model itself and protocols for participating in the pilot.
- **Communications.** The plan should provide clear channels and procedures for communication between users and the pilot program management team. Communications materials should be simple and clear to promote understanding about the model and its intended use.
- **Protocols for capturing and assessing user feedback.** There should be a set process for collecting and using feedback about the model to build trust in the process and to ensure valuable input is used.

**Recommendation 2 – Governance:** The Panel recommends development of a governance process, including designation of the FSA's Executive Leadership Council as the governance body to oversee the project, ensure it has adequate support within the agency and meets the needs of the agency, and to oversee pilot testing. The ELC is the senior body of leaders comprised of the Administrator; the Associate Administrator for Operations and Management; the Associate Administrator for Policy and Programs; the Deputy Administrators for Farm Programs, Farm Loan Programs, Commodity Operations, Field Operations, and Management; and the Chief Financial Officer. The ELC should provide the leadership and oversight of implementation of the model, including approval to move forward with the pilot, review of the pilot test results, and approval of changes to the model for implementation. The ELC would have an ongoing leadership role to include periodic status reviews of model use, user feedback and planned changes, prioritization of investments, and leadership direction to ensure the model remains relevant and useful to the agency. FSA has since created a governance process incorporating the role of the ELC.
As part of this ongoing role, the Panel recommends that the ELC make decisions on model adjustment factors and improvements with a regularized process. The ELC will need to review certain aspects of the model in preparation for pilot testing and, subsequently, for agency-wide implementation, including the following:

- FSA should assess the current state-level complexity factors to determine whether they provide a sound basis for adjusting performance scores, which are built from county/service center-level data.
- FSA should assess two complexity factors – agricultural diversity and economies of scale to determine to what extent they capture distinct sources of variation or are instead two different expressions of the same characteristic.
- Once the model design is finalized for implementation after the pilot test, changes should be strictly limited. Stability of the model is critical to the credibility of the staff allocation decisions it informs. While modifications will be needed in response to significant statutory and other environmental changes, they should be subject to a rigorous review, prioritization and approval process.

**Recommendation 3 – Data Quality:** FSA should continue its efforts to improve data quality. Throughout all stages of model pilot testing and implementation, efforts should be focused on securing feedback to validate results. Outreach and training should be deployed to improve the accuracy of time and attendance reporting by employees and efforts should be undertaken to continue improvements in program unit data collection.

**Recommendation 4 – Model Implementation:** For long-term management of the model, FSA should institutionalize the dedicated staff and protocols including documentation to ensure that there are processes in place to ensure that user input is considered, changes are prioritized and implemented in a systematic manner, and adequate levels of technical assistance, outreach and training are understood.

**Recommendation 5 – Protocols for Decisions:** The Panel’s recommendations go beyond the fate of the model and address the need for FSA to have an orderly process for the development of staffing allocations. No model can encompass all the factors that agency leadership must consider in making final state-level staff reallocations and leadership must have discretion to do so. However, FSA should establish clear decision protocols to help ensure that discretion is exercised in a disciplined and transparent way. These protocols would address the use of the model for SED and Deputy Administrator for Field Operations and Management (DAFO) staffing decisions accompanied by guidelines for deviations from the model. One example of a protocol is the allocation of staffing for offices in areas where an ongoing presence is needed and may not be justified based on workload. Protocols can be created to allow for deviation from the model, if there are programmatic reasons to maintain staff, for example, to serve a unique customer base, such as young or underserved farmers and ranchers or new technologies and emerging areas. Decisions should be clearly understood, documented, and communicated along with the model to improve understanding and build support among stakeholders for FSA staffing decisions.
Recommendation 6 – Longer-Term Model Improvement: The Panel recommends the following workload analysis and staffing model capabilities for future development. The level of effort and timing of these improvements should reflect prioritization by the ELC:

- Workload analysis at the county-level — developing a workload analysis and staffing model for county-level allocation for use by State Executives would provide the agency with a powerful tool, communicating workload in individual county offices. The results would help the SEDs and DAFO in decision making about staffing and provide a basis for understanding the uniqueness of offices and clientele that are served by FSA.

- Determining staffing need—to include developing measures of workload, including the capture of work that is not currently being addressed with existing staffing. Throughout the discussions with FSA and stakeholders, there was a consistent view that FSA needs to be able to estimate and communicate workload requirements or standards for the delivery of programs. This need was expressed in terms of understanding the workload needed to adequately serve farmers and ranchers on an ongoing basis and in the face of programmatic and cultural changes, and to communicate workload changes resulting from the Farm Bill. Since the Farm Bill is reauthorized on a regular (4-6 years) basis, the ability of FSA to estimate workload would be a powerful tool.

- Case management— an approach that can be used to capture work as described in Final Recommendations Report for Workload Analysis. Case management software, which is already in use at USDA, could be used to quantify workload for tasks and functions in FSA programs and provide a basis for formulating staffing need. Deloitte recommended that this capability be a focus in the longer-term development of BPMS.

- Assessment of skill gaps— a more granular analysis of workload to inform assessment of specific skill gaps would allow FSA to evaluate the needed skills as they fill positions and optimize the ability of employees to administer programs. This assessment of workforce needs aligns with best practices recommended by OPM, GAO, NAPA and others.\textsuperscript{113}

- National headquarters and state office workload analysis – the ability of FSA to model workload for headquarters and state offices would complement and strengthen FSA’s ability to effectively allocate staff and assure stakeholders that county office employees are not disadvantaged.

- Moving to a scalable platform – would allow FSA to more effectively use the model, share training and communication, accept and consider input from users and quickly implement changes.

Part II: Key Technical Elements of FSA Workload analysis and staffing model

The “BPMS Workload analysis and staffing model” provides a basis for evaluation and comparison of FSA office workload by state and is an important tool for informing staff allocation decisions and supporting budget requests. Using data about how employees spend their time, already collected through the time and attendance system, and matching that up with data about how many program units are produced, (data collected for the cost accounting and budgeting systems) the model generates a relative scoring of state performance for 40 farm programs and farm loan programs administered by FSA. Subject Matter Expert opinions help inform the details of the model, including adjustment factors to differentiate between states by recognizing variability that may result from geographic diversity, variety in agricultural crops and livestock operations, frequency of disasters, and economies of scale. Expert opinion also shaped FSA adjustment factors developed to evaluate the impact of the 2014 Farm Bill on county office workload, until real timekeeping records accumulate over a sufficient period of years.

When the model is implemented fully, it will assist FSA leadership in the management of resources, producing cost and performance data about the programs in individual offices and by state and providing a data-driven tool for decisions about the allocation of staffing. This section of the appendix describes in some detail the model, the systems that generate data that feed into the model, and the calculations leading up to the outputs of the model.

The Budget and Performance Management System (BPMS)

FSA began development of the Budget and Performance Management System (“BPMS”) in 2008, as part of a federal government-wide effort to implement standardized, automated budget formulation and execution solutions. BPMS collects data on all employees. BPMS now includes web-based systems capabilities and a data warehouse and reporting tool. BPMS integrates information from multiple systems, including enterprise financial and accounting and time and attendance systems used throughout the Department of Agriculture. Essentially, BPMS enables the collection of data that can be used to implement performance and cost analyses that are useful in assessing the success or failure of a particular program or feature of FSA’s mission and are required for financial and performance reporting purposes. The system does not exist solely, or even primarily, to collect data useful to workload analysis.

BPMS and the workload analysis and staffing model are managed by the FSA Office of Budget and Finance, which reports to the FSA Chief Financial Officer (CFO). The CFO reports to the Associate Administrator for Operation and Management.

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114 As described in this report, the BPMS staffing model is capable of being implemented in a way that enables office workload comparison at the county and state level. FSA collects workload data on headquarters. Full implementation is a recommendation of the Panel in this report.

115 “BPMS is a management tool to facilitate the Farm Service Agency’s transformation to a more performance-based, results-focused organization.” FSA website: https://www.fsa.usda.gov/about-fsa/budget-and-performance-management/index
Overview of the BPMS Workload analysis and staffing model Inputs and Data Sources
The BPMS Workload analysis and staffing model leverages data collection efforts by utilizing information collected for other purposes, including:

- Hourly data (for the payroll system); and
- Program and activity data (for the cost accounting system).

Hourly Data:
- WebTA, the official system of record for time and attendance reporting used throughout the Department of Agriculture (USDA), is used to generate the payroll for USDA agencies. When entering their time and attendance, employees identify their organization and source of funds using a 14-digit accounting code and record their hours worked, leave hours taken, overtime leave when authorized, administrative leave and other categories of time and attendance. Employees are required to enter their time and attendance for the two-week pay period, accounting for time in 15 minute or greater increments. USDA issues instructions and guides employees through the reporting process in a WebTA portal.
- FSA has embedded into the WebTA system a set of program and activity codes for employees to use to capture further detail about how they spend their time, both defining the program and the type of activity. Employees can select among program and activity codes using pull down menus to define their use of time. The Activity Reporting System (ARS) extracts this program and activity information from WebTA for use in the cost accounting module. ARS is a component of BPMS and makes this information available for use in the BPMS workload analysis and staffing model.
- Employees enter their time and attendance information and specify the program and activity combination that best describes the work they have performed for each two-week pay period, in 15-minute (or greater) increments. The program code links to the FSA mission areas and aligns with the agency budget presentation (a list of program codes is included in Appendix D). The activity code describes the detailed actions employees perform in support of each program (a list of activity codes is included at the end of this Appendix D).

Program Data (and matching Activity Data):
- FSA uses 56 program codes including 44 that align with work in four major mission categories – Farm Loans (2), Conservation (7), Income Support and Disaster Assistance (23), and Commodity Operations and Warehouse Regulation (12); seven that capture work done on behalf of other agencies including the Risk Management Agency, Foreign Agricultural Service and others including reimbursable work; and five that capture time worked in common program areas that cannot be assigned to a single program, such as administrative duties, non-program related work, Commodity Credit Corporation Operations, furlough hours, and leave.
- Program reporting for individual county employees is significantly reduced from the universe of codes maintained by FSA. County office employees do not use all of the program codes, but select among 40 program codes in three program areas for Farm Loans, Conservation, and Income Support and Disaster Assistance. County employees do not record time in the 12 commodity operations program codes, one
code for Commodity Credit Corporation operations and the three codes used for services provided to other agencies because these programs are operated out of headquarters.

- **Use of program codes by individual employees is further limited based on their assigned programs and areas of expertise. As an example, an employee who spends his or her time working with farmers and ranchers to facilitate their participation in a conservation reserve program (CRP) would select among seven CRP program codes in their time and attendance reporting.**

- **Matching Activities** – There are 43 activity codes that are used by employees in the time and attendance system to describe the detailed work done in support of programs. There are nine mission direct activity codes and 34 enabling and support activity codes.

  Two **mission direct** activities are involved in county office delivery of individual program services that generate a measurable program unit. A program unit is a specific output recorded by county office employees, including for example a loan, a completed application, a payment, or a contract. County office employees use these two activity codes to define the majority of their work. The two mission direct activities are:

  - **Transaction Origination and Signup (TO&S)** – Hours recorded in this activity capture the full spectrum of effort from initiating an application form to dispensation of the application, including assisting the customer, determining if the customer is eligible, approval or disapproval of a loan or contract, preparing all the necessary documentation, and disbursing the funds or notifying the customer that the loan/contract was disapproved.

  - **Servicing and Maintenance (S&M)** – Hours recorded in this activity capture ongoing servicing and maintenance of loans or contracts including record keeping, payment processing, customer correspondence, compliance reviews, or collections for delinquent accounts.

  The remaining seven mission direct activity codes are used primarily by headquarters and state offices and are for unique, defined purposes, including for example Deepwater Horizon, Litigation-Law Action, and License and Agreement Administration.

  County employees also record their time using the 34 mission enabling and support activities. These activities are used to record time spent on actions that enable and support the accomplishment of programs, but do not directly relate to the

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116 The following descriptions are taken from the FSA Activity Dictionary, which is a component of the FSA Handbook: Activity Reporting and Managerial Cost Accounting.

117 This program code relates to work done in a subset of state offices to support USDA participation as a major agency involved in response and remediation efforts after the Deepwater Horizon and BP oil spill along the Gulf Coast. There were 6 county office employees who charged time to this code in a recent period. At the same time, it is important to keep careful track of this work for both recognition and reimbursement purposes.
production of a measurable program unit and include, for example, maintaining farm records; FOIA requests; County Committee election management; administration; finance and accounting; HR; training and leasing (for office space). The distinction between mission direct versus enabling and support activity codes is meaningful. Hours recorded in mission direct activities are used in the model as reported by employees. Hours recorded in enabling and support activities are reallocated to mission direct activities, according to application of an allocation formula. This process to shift the hours from enabling and support to mission direct activities is called “burdening” and is described in greater detail later in this appendix.

- **Program and Activity Combinations** – The program and activity data collected into ARS forms the basis for defining how employees utilize their time. A review of the program and activity matrix suggests a large possible number of possible combinations. However, in practice, the number of combinations used by most employees is much smaller because most employees are working within a limited number of programs and conducting a defined set of activities. FSA employees who administer the farm loan programs work almost exclusively on loans and would use only two program codes combined with two mission direct activities and 15 or less mission enabling and support activities. County office employees who administer farm programs would primarily select among 23 income support and disaster assistance codes (one for each different program) and seven codes for Conservation Reserve Programs. They would be selecting among a subset of less than 20 activity codes, because some (e.g., the codes for “economic and policy analysis” and “external affairs”) are used primarily, if not exclusively by staff located at headquarters.

Although the study team heard concerns from FSA employees about the workload burden of time and attendance reporting in support of the model, on further investigation the program and activity reporting did not appear to be a significant factor except for a subset of employees who have a diversity of programs and activities they perform. And, even for employees expected to have a relatively high number of possible program and activity combinations, the number in practice seems manageable. The study team reviewed an anonymized sample of time and attendance records for employees representing headquarters, state and county offices. A District Director, the employee with the most varied set of duties, recorded time under only 16 program and activity combinations.

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118 In total, there are 935 total possible combinations of program and activity codes for FSA employees to use when they record their time and attendance in WebTA. For individual county office employees, however, work is limited to a smaller subset of 598 program and activity combinations. While this matrix does not reflect the most current set of program and activity codes, updates made since do not suggest a significant change in the magnitude of possible combinations.
Moreover, it is important to note that employees were most vocal about the requirement to report time and attendance in increments of 15 minutes or more, which is a standard requirement for all USDA employees as part of time and attendance reporting in WebTA. Such reporting would be required for payroll creation and implementation even if BPMS did not exist.

**Program Unit Data:**
FSA collects information on workload for the programs it administers to meet accountability and reporting requirements, including, for example, farm loans, conservation reserve program contracts, and loan deficiency payments. A subset of the information collected is used in the BPMS workload analysis and staffing model. FSA has identified discrete program units to assess the level of program work conducted in each program and in each county office and results can be summarized by state and at the national level. The cost accounting module pairs program unit data with hourly program and activity data to generate a measure of productivity. FSA managers use this information to meet budget and program performance reporting requirements and to oversee program execution.

FSA’s Kansas City Office compiles the program unit data collected in FSA offices nationwide and through multiple reporting systems and performs checks and validation to prepare the data for use in the cost accounting module and the workload analysis and staffing model.

The following examples show the pairing of program unit data with program and activity data (using the two mission direct activities) that is the basis for workload analysis using the cost accounting module and workload analysis and staffing model. For example:

**Pairing Hourly Data with Program Unit Data**

<table>
<thead>
<tr>
<th>Program</th>
<th>Activity</th>
<th>Program Unit Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Loan Program</td>
<td>Transaction Origination and Signup</td>
<td>Number of Loan Applications</td>
</tr>
<tr>
<td></td>
<td>Servicing and Maintenance</td>
<td>Active loans, loans and loans disbursed</td>
</tr>
<tr>
<td>Conservation Reserve Program</td>
<td>Transaction Origination and Signup</td>
<td>CRP Offers</td>
</tr>
<tr>
<td></td>
<td>Servicing and Maintenance</td>
<td>Active contracts and contracts</td>
</tr>
</tbody>
</table>
Calculations to Derive Performance Ratios

The BPMS model accounts for the hours reported by employees in support of program performance and derives ratios that relate hours worked to program outputs. These ratios are developed by applying two operations to the hourly and program data:

- “Burdening” the “mission direct” hours with “supporting and enabling” hours; and
- Applying a “Performance Ratio” to the burdened hours, a measure of employee hours needed to perform a program unit.\textsuperscript{119}

**Burdening:** FSA uses the burdening process to develop measures of staff time (quantified in hours by program and activity) used to complete program actions. Both the mission direct hours and the supporting and enabling hours reported by employees are summed in the burdening process to account for all hours reported for each program, by program. For each program, the hours recorded by employees for 34 supporting and enabling activities are shifted to or “burdened” on the hours reported for two mission direct activities, “transaction origination and signup” and “servicing and maintenance.” The burdened hours for each program grouped into these two mission-direct activities are used with program units to generate production metrics. The hours from mission enabling and support activities are spread proportionately to the two mission direct activities based on the distribution of hours recorded for the mission direct activities.

The following depicts the outcome of the burdening process using data collected for the Conservation Reserve continuous signup program, Servicing and Maintenance Activity, for county offices in State X for FY 2013. Thus, the 5 mission direct hours reported by the Santa Rosa office are increased for 12.617 enabling and support hours (a portion of the hours reported – the balance are allocated to Transaction Origination and Signup activity) for a total of 17.617 hours.

\textsuperscript{119} Performance Ratio = burdened hours/recorded program units
Conservation Reserve Program – Continuous Signup (State X)

<table>
<thead>
<tr>
<th>Servicing and Maintenance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mission Direct Hours</td>
</tr>
<tr>
<td>-------------------------</td>
</tr>
<tr>
<td>County Office A</td>
</tr>
<tr>
<td>County Office B</td>
</tr>
<tr>
<td>County Office C</td>
</tr>
<tr>
<td>County Office D</td>
</tr>
<tr>
<td><strong>Total State X</strong></td>
</tr>
</tbody>
</table>

Note: The Study Team developed this display based on data provided by FSA October 1, 2015.

Once the burdening process has been completed, the program unit data for each program (in two activities) can be used to compare performance across county offices and states. This information is used by FSA to generate reports sent to senior leadership. In 2014, reports using FY 2013 data for county offices were distributed to the SEDs. State offices were asked to evaluate the information and provide feedback about reporting errors. Officials told the study team that the information was used by the SEDs to inform their management of programs and offices.

**Performance Ratio:** The calculation of the performance ratio is the point at which the program unit reporting is aligned with hourly reporting of programs and activities. For each program, the burdened hourly data are used along with the program unit data to generate a performance ratio calculated as follows:

\[
\text{Performance ratio} = \frac{\text{Burdened Hours}}{\text{Program Units}}
\]

This ratio is expressed as a number with two decimal places and is derived using the three most recent years of data. The performance ratio provides a comparable measure of employee hours used to complete a program unit. The ratio is calculated for each county office and is summed by state for comparison purposes and to assess program performance and workload. The lower the ratio, the more program units are being produced for fewer hours worked. The accuracy and consistency of reporting are important considerations in the use of the ratio to evaluate field office performance. FSA reports that the data accuracy and consistency is increasing.

The box below shows how the performance ratio is calculated for county offices and the state of State X for the Conservation Reserve continuous signup program, servicing and maintenance.
maintenance activity. A national average is calculated using scores from all the states (including Puerto Rico and the Pacific Basin).

| Conservation Reserve Program– Continuous Signup (State X) Servicing and Maintenance |
|-----------------------------------------------|-----------------------------------------------|-------------------------------|-------------------------------|
| County Office A                              | Burdened Hours: 17.62                         | Program Units - Active Contracts: 65 | Ratio Burdened Hours/ Unit: 0.27 |
| County Office B                              | Burdened Hours: 44.37                         | Program Units - Active Contracts: 5  | Ratio Burdened Hours/ Unit: 8.87 |
| County Office C                              | Burdened Hours: 157.77                        | Program Units - Active Contracts: 7  | Ratio Burdened Hours/ Unit: 22.54 |
| County Office D                              | Burdened Hours: 0                             | Program Units - Active Contracts: 32 | Ratio Burdened Hours/ Unit: --  |
| **Total State X**                            | **Burdened Hours: 219.76**                    | **Program Units - Active Contracts: 109** | **Ratio Burdened Hours/ Unit: 2.24** |
|                                              |                                               |                                              | **Ratio Natl. Avg: 4.84**       |

Note: The Study Team developed this display based on data provided by FSA October 1, 2015

**Scoring, Complexity Factors and Farm Bill Adjustments**

The model has the capability, using the county office performance scores aggregated at the state level to adjust for geographic and other variability factors leading up to state-level staffing recommendations. In a step-wise manner, the process flow is as follows:

- Converting performance ratios to state performance scores;
- Adjusting performance scores for differences in state operating environments;
- Developing State Composite scores;
- Generating state-level staffing recommendations; and
- Adjusting the model outcomes for estimated workload impacts of the 2014 Farm Bill.

**Converting Performance Ratios to Performance Scores:** In the workload analysis and staffing model, the performance ratios for the states (incorporating three years of historical data using burdened hourly and program unit data) for each program, are converted into scores. The scores for all 50 states and, Puerto Rico and the Pacific Basin areas are arrayed on a scale of 0-100. States with the lowest performance ratio (states generating more program units while using fewer hours) have the highest scores and states with the highest ratios (states generating a lower number of program units while using more hours) have the lowest scores. This allows FSA to evaluate the relative scores of the states and evaluate the reasons for variability in workload and performance, identifying best practices in states with high scores. This result is the basis to consider the potential for staffing changes.

The following displays the conversion of state performance ratios to scores for a selection of states in the Direct and Counter-cyclical payments program, including scores for the lowest and highest scoring/performing states in this program. This example excludes
states without data that are assigned a score of 100. State L with the lowest performance ratio receives the highest score of 99 and State Y with the highest performance ratio receives the lowest score of 2 and the rest of the states are arrayed across that range for comparison.

<table>
<thead>
<tr>
<th>State</th>
<th>Burdened Hours</th>
<th>Program Units</th>
<th>Performance Ratio</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>State 1</td>
<td>73,296</td>
<td>168,008</td>
<td>0.44</td>
<td>72.00</td>
</tr>
<tr>
<td>State 2</td>
<td>35,805</td>
<td>39,276</td>
<td>0.91</td>
<td>29.00</td>
</tr>
<tr>
<td>State 3</td>
<td>86,869</td>
<td>83,947</td>
<td>1.03</td>
<td>27.00</td>
</tr>
<tr>
<td>State 4</td>
<td>97,230</td>
<td>335,900</td>
<td>0.29</td>
<td>87.00</td>
</tr>
</tbody>
</table>

**Lowest Performing**

<table>
<thead>
<tr>
<th>State</th>
<th>Burdened Hours</th>
<th>Program Units</th>
<th>Performance Ratio</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>State L</td>
<td>19,722</td>
<td>5,796</td>
<td>3.40</td>
<td>2.00</td>
</tr>
</tbody>
</table>

**Highest Performing**

<table>
<thead>
<tr>
<th>State</th>
<th>Burdened Hours</th>
<th>Program Units</th>
<th>Performance Ratio</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>State H</td>
<td>142,990</td>
<td>641,064</td>
<td>0.22</td>
<td>99.00</td>
</tr>
</tbody>
</table>

Note: The Study Team developed this display based on data provided by FSA October 1, 2015.

**Adjusting Performance Scores for Differences in State Operating Environments:** A key issue for FSA leadership is comparing program workload and performance across states while recognizing the diverse operating environments caused by variability in geography, scale and scope of farm and ranch operations, disasters, weather and other factors. FSA officials told the study team that program demand and workload is influenced by this variability and explains, in part, the differences in the performance ratios across states.

In order to address this issue, FSA convened an internal group of subject matter experts, including SEDs and headquarters leadership to get input. They identified and helped to develop and weight three measures of complexity that are used to adjust state performance scores including:

- **Agricultural diversity:** The scores of states with greater agricultural diversity are expected to be lower than those of states with less diversity because the workload is more complex and greater. To adjust for this variance, points are added to state scores proportional to quantified indices of agricultural diversity. Data provided by

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120 This program was eliminated by a provision in the 2014 Farm Bill. That does not have an impact on using the data to demonstrate how the model works.
the National Agricultural Statistics Service is used to develop the indices and weighting. Agricultural diversity is a composite measure of four variables:

- **Crop count** – Using this factor, states working with farms with a higher diversity of crop types receive additional points;
- **Livestock variety** – States working with farms with more diverse livestock types receive additional points;
- **Shared land** – Leased land causes additional complexity and states with more leased land receive additional points;
- **Irrigated land** – Additional points are given to states with farms that have a high proportion of production on irrigated land.

- **Disaster Frequency**: The model has the ability to adjust state scores for the impacts of disaster on workload. State scores receive additional points for the impact on workload when employees respond to the immediate needs of farmers and ranchers impacted by natural disasters. Data capturing the disaster events is collected from the Federal Emergency Management Agency and includes disasters recognized by declarations made by the President, the Secretary of Agriculture or the Governor of a State.

The Farm Bill of 2014 permanently authorized disaster assistance programs in order to provide for a more regularized approach to responding to the needs of farmers and ranchers in times of disaster. However, up until FY 2015, there were lags in funding disasters and timing was dependent on declarations and action by Congress to approve funding. The workload following enactment of the 2014 Farm Bill included extensive work to catch up on claims from prior year disasters.

- **Economies of Scale**: In larger FSA offices, employees are able to specialize and achieve economies of scale completing more program units with fewer hours, resulting in higher state scores. Small offices do not have the ability to specialize as employees are working with several programs and they may not be as familiar with the requirements and so likely would not achieve these higher production rates. To compensate for this, points are added to the scores of states with small offices.

In the information evaluated by the study team, 100 points were added to the performance scores of programs in states with offices too small to achieve economies of scale. These included all but five of the states. The performance scores of programs in five high-performing states identified did not receive any additional points.

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121 2014 Farm Bill, §§ 1501 et seq., Supplemental Agricultural Disaster Assistance, 128 Stat. 697; 7 USC §9081; Pub. L.113-79 Most programs now receive mandatory funding amounts that are "such sums as necessary" and are not subject to annual discretionary appropriations. See CRS Report No. RS21212, *Agricultural Disaster Assistance* (April 14, 2016); [https://www.fas.org/sgp/crs/misc/RS21212.pdf](https://www.fas.org/sgp/crs/misc/RS21212.pdf)
Developing State Composite Scores: The outcome of the workload analysis and staffing model is a set of composite scores for each state. FSA creates a composite score for each program by state, including the points from the initial score and points for each complexity factor that are weighted in the composite score including:

- Initial score points multiplied by 55%;
- Plus the agricultural diversity points multiplied by 25%;
- Plus the disaster frequency points multiplied by 10%;
- Plus the economies of scale points multiplied by 10%.

The significant weight – one-quarter of the total – attached to the agricultural diversity score recognizes the importance of this to the evaluation of program performance. This is near the maximum assignment possible, while still aligning with the leading practice of assigning a majority of the weighting to the initial score that is based on historical data.

The following example demonstrates how the composite score is developed for the state of Arizona.

<table>
<thead>
<tr>
<th>Scoring Element</th>
<th>Sub-Score</th>
<th>Weight</th>
<th>Points Assigned</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Score</td>
<td>2.00</td>
<td>55%</td>
<td>1.10</td>
</tr>
<tr>
<td>Agricultural Diversity</td>
<td>20</td>
<td>25%</td>
<td>5.00</td>
</tr>
<tr>
<td>Disaster Frequency</td>
<td>40</td>
<td>10%</td>
<td>4.00</td>
</tr>
<tr>
<td>Economies of Scale</td>
<td>100</td>
<td>10%</td>
<td>10.00</td>
</tr>
<tr>
<td><strong>Composite Score</strong></td>
<td></td>
<td></td>
<td><strong>20.10</strong></td>
</tr>
</tbody>
</table>

Note: The Study Team developed this display based on data provided by FSA October 1, 2015. This program was eliminated by the 2014 Farm Bill.

Generating State Level Staffing Recommendations: The model is used to generate composite scores that can be used to consider state staffing for each program on a comparative basis. The development of recommendations for state-level staffing includes the following major elements:

- A banding methodology,
- Parameters on staffing change, and
- Staffing recommendations

Banding: The state composite scores are banded into three groups – high, medium and low. The banding shown to the study team established the high band to be above a score of 75, the middle band within the range 35-75, and the low band below a score of 35. The banding methodology avoids benchmarking using a single score and mitigates the risk of error that could be caused by data reporting inaccuracies, inconsistency in reporting, and variance introduced by aggregating county office scores into a single state score.
As displayed in the graphic on the following page, FSA’s evaluation of state scores considers the following:

- States in the middle band with scores of 35-75, are considered to be performing in a range of expected performance - an acceptable range.
- States with scores above the middle band, above 75, are able to perform the most program work with the least staffing hours and attain the highest scores. These are considered to be high performing. This implies that they are already very efficient and cannot realize additional production with current staffing levels.
- States with scores in the lowest band, below 35, display low program unit output and high staff hour consumption, suggesting they have less demand and/or have a smaller staff that cannot specialize and are therefore less efficient.
High Performance Ratio

- High demand, i.e. high metrics, relative to staffing levels
- Efficiency benefits, i.e. economies of scale, senior staff,
- Less Agricultural Diversity and less complex producer operations, program
- Uncompensated time, i.e. time for work not recorded
- Incomplete work - all requirements of applications, contract, etc. not completed
- Low travel requirements, low topographical barriers

Low Performance Ratio

- Low demand, i.e. low metrics, relative to staffing levels
- Efficiency issues, i.e. training needs, over-staffing, new staff, technology issues
- Higher than average complexity of contract, producer, or applicant
- Less uncompensated time
- More completed work with all requirements being completed
- Higher than average travel required for completion of loan, contract, applications, etc.

Source: FSA
Parameters on Staffing Change: FSA has developed parameters to help manage staffing reallocations based on the model. These parameters have two purposes: to mitigate the risk of model error given concerns about data accuracy and variability; and to limit recommended staffing changes to a range considered feasible.

FSA has developed two different sets of parameters – one for the farm loan program and one for the farm programs. This reflects different levels of confidence in the model’s capacity to accurately compare the performance of state programs in these two areas. Farm programs are much more diverse than loan programs and have been subject to greater change over time. The farm loan programs are seen as relatively uniform and more stable over time. Farm programs address a diverse set of needs (including disaster assistance) and vary widely relative to workload demands. Also, the farm programs are subject to greater changes based on authorization of the Farm Bill, as evidenced by the 2014 Farm Bill, which created new farm programs and eliminated others. Given the greater certainty about farm loans, wider parameters are applied to farm loan staffing recommendations as follows.

- **Farm Programs:**
  - States with scores below 35 (in the lower band) are expected to increase their score and achieve higher performance and/or greater efficiency by reducing hours. The possible reduction of hours is moderated by limiting the possible reduction to the number of hours represented by a change of 15 points in the state composite score.
  - States with scores higher than 75 (in the upper band) are expected to receive additional hours in order to allow for continued high performance and/or address high levels of workload. The number of hours that can be added is limited to the number of hours that represent a score change of 2 points.

- **Farm Loan programs:**
  - States with scores below 50 are expected to lose hours. The change is limited to the number of hours that will result in an increase to the state composite score of 20 points.
  - States with scores higher than 67 are expected to receive additional hours. The state composite score cannot change by more than 6 points.

FSA’s use of the parameters to manage potential staffing changes is demonstrated in the box below. The state composite score for State Z is 16.6. In order to move the state to an acceptable score of 35 would require a change of 18.4 points. The parameters limit the possible change to a maximum of 15 points. A change of 15 points to the score for State Z results in a revised composite score of 31.6, and a reduction in staffing in this program comparable to 6,162 hours or 3 full time staff.
### Composite Performance Score Direct and Cyclical Payments - State Z

<table>
<thead>
<tr>
<th>Scoring Element</th>
<th>Sub-Score</th>
<th>Weight</th>
<th>Points Assigned</th>
</tr>
</thead>
<tbody>
<tr>
<td>Original Score</td>
<td>12.00</td>
<td>55%</td>
<td>6.60</td>
</tr>
<tr>
<td>Agricultural Diversity</td>
<td>0</td>
<td>25%</td>
<td>0</td>
</tr>
<tr>
<td>Disaster Frequency</td>
<td>0</td>
<td>10%</td>
<td>0</td>
</tr>
<tr>
<td>Economies of Scale</td>
<td>100</td>
<td>10%</td>
<td>10.00</td>
</tr>
</tbody>
</table>

**Initial Composite Score**  16.60

**Removing 6,162 hours – changes the composite score by 15 points**

| Revised Score                | 39.27     | 55%    | 21.60           |
| Agricultural Diversity       | 0         | 25%    | 0               |
| Disaster Frequency           | 0         | 10%    | 0               |
| Economies of Scale           | 100       | 10%    | 10.00           |

**Revised Composite Score**  31.60

Note: The Study Team developed this display based on data provided by FSA October 1, 2015

**State Staffing Recommendations:** The final step in the development of staffing recommendations based on the model is the development of a total staffing allocation for each state. The hours added or subtracted to adjust the scores for each program in the state are summed. That sum of hours is then converted to full time staffing to identify the total number of positions that must be added or subtracted to move the state to the acceptable performance band.122

**Adjusting the model outcomes for estimated workload impacts of the 2014 Farm Bill:** The model outputs that the study team reviewed (using 2011-2013 data) did not address workload resulting from program changes directed in the 2014 Farm Bill, because the Agricultural Act of 2014 was enacted on February 7, 2014 and implementation began after the close of 2013. To address this gap in information needed to portray the expected workload, FSA developed a set of quantitative adjustments to state composite scores in order to replicate program changes resulting from implementation of provisions in the Farm Bill. The adjustments result in the removal of points for programs that were terminated or reduced in the Farm Bill and the addition of points for programs that were...

122 An approximate 2,080 hours per year are comparable to one, full-time position. Reference OMB Circular A-11 (2015), Section 85.
added or expanded in the Farm Bill. The value of the adjustment factors are based on cost-benefit analyses of program changes that FSA formulated during negotiation of the 2014 Farm Bill.

For example, FSA estimated that the work required to deliver the new Agricultural Risk Coverage (ARC) program is comparable to 125% of the work for the Average Crop Revenue Protection (ACRE) program that was discontinued in the Farm Bill. Application of this adjustment factor would increase state scores for ACRE by 25% to reflect the new ARC program and elimination of the ACRE program.

The following adjustment ratios were developed to address the areas in the Farm Bill that have an impact on workload and staffing needs. The following new programs, listed first, are considered comparable to old programs terminated in 2014, as follows:123

- Cotton Transition Assistance Program (new in Farm Bill) Hours for Servicing = 100% of Direct and Counter-Cyclical Payment (eliminated in Farm Bill)
- Agricultural Risk Coverage (new) Individual Hours for Signup and Servicing = 125% Average Crop Revenue Collection (eliminated)
- Agricultural Risk Coverage County and Price Loss Coverage (new) Hours for Signup and Servicing
  o Generic based acres = 150% of Direct and Counter-Cyclical Payment (eliminated)
  o Non-generic based acres = 100% of Direct and Counter-Cyclical Payment (eliminated)
- Margin Protection Program (new) Hours for signup and servicing = 50% Milk Income Loss Contract (eliminated)

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123 Data as reported in June 2015. Estimates are subject to further refinement as more real data under the 2014 Farm Bill programs are collected. FSA, *Staffing Reallocation Model (Draft)*, Version 1.3, p. 25.
APPENDIX F: CUSTOMER SERVICE LEADING PRACTICES

The federal government provides a variety of services to the public and faces growing pressure to improve service quality. This is a summary analysis of customer service best practices primarily from the public sector (with some references to the private sector) and examines three key questions: (1) How is customer service defined in a government context? (2) Who are government customers? (3) How can government customer service be improved?

How is Customer Service Defined?

There is no universally agreed-upon method for defining customer service. Private sector best practices suggest a customer-centric approach (i.e., the quality of customer service is often defined by the opinions of customers). An organization's services delivery strategies should be driven by customer needs and expectations. It is sometimes said that “if customers think the service they get is of the highest quality, then it is.” This sounds good but it can be misleading. Customer opinion is not the only factor. It is probably better to say that in the private sector “good” customer service is defined by increasing sales revenue and especially repeat customer business. Sales revenue and repeat business may be proxies for customer opinion, but they are measurable and can be quantified in ways opinion cannot. Customers are hard to attract and easy to lose to the competition. Customer service can be prioritized by treating customers with the highest financial value to the company one way and less valuable customers another way, within reasonable limits.

Customer service in the public sector has some things in common with customer service in the private sector but it also has some important differences. For one thing, government is not competing for customers. If providing top quality customer service in government is a goal (and it should be), different incentives are required to foster it and different indicators are required to assess it. In addition, government does not choose its customers. While the private sector can focus on customers who buy actively and deliver the most profit for the organization now and in the prospective future, priority users of government services may be disadvantaged individuals who are not very able to be active in the relationship. Government’s focus is on the eligible, defining the eligible as broadly as the legislative mandate intends, followed by a quest to serve all of the eligible with high quality services of equal value to all of those equally situated.

Absent the features that drive private sector customer satisfaction, government efforts are often evaluated on a number of different grounds, such as whether 1) an agency’s customer service plan, standards, and performance information are clear, understandable, and publicly available; 2) government service processes and procedures are effective and efficient; and 3) government employees are courteous, responsive, and professional when interacting with customers. These are all “input measurements” that, when attained, stand in for output measurements (e.g., things like increased sales or profits). In addition, to the...
extent that output can be measured by customer satisfaction feedback that should definitely be part of the effort for government customer service evaluation.

Government has undertaken a wide range of actions to strengthen customer service over the last twenty-five years. Since 1993, a number of executive orders and OMB memos have been issued to articulate the expectations for government customer service. For example, President Clinton released an executive order, Setting Customer Service Standards, in 1993. The order states that the government should provide “customer service equal to the best in business.” This effort was reinforced by a 2011 executive order stating that “the public deserves competent, efficient, and responsive service from the federal government.” In March 2014, OMB established a “Cross Agency Priority” (CAP) goal on customer service to “help agencies deliver world class customer service to citizens that is on par with leading private sector services...” These statements also highlight the importance of applying private sector best practices to improve public service. Customers expect to receive the same level of services from the government as they receive from high-quality actors in the private sector.

Earlier this year, OMB launched a Core Federal Service Council to serve as “a government-wide governance vehicle to improve the public’s experience with federal services...” The Council, consisting of representatives from major transactional services agencies/programs, will focus on promoting the use of public and private sector management best practices, such as “conducting self-assessments and journey mapping, collecting transactional feedback data, and sharing such data with frontline and other staff.” According to OMB, the Farm Service Agency is one of the 27 program areas represented on the Council. The lead FSA representative is Greg Diephouse, the Deputy Administrator for Field Operations, and the alternate is Glenn Schafer, a program management specialist associated with the Bridges to Opportunity initiative.

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125 Ibid. at page 1.
128 The Council was launched March 30, 2016. [https://www.whitehouse.gov/blog/2016/03/30/delivering-results-american-people](https://www.whitehouse.gov/blog/2016/03/30/delivering-results-american-people)
129 OMB memo. [https://www.whitehouse.gov/sites/default/files/omb/memoranda/2016/m-16-08.pdf](https://www.whitehouse.gov/sites/default/files/omb/memoranda/2016/m-16-08.pdf)
130 Ibid.
131 Conversation with Kala Shah, OMB contact for the Core Federal Service Council.
Who Are the Customers?

The first step to improving government service is to clearly identify who the customers are. Agencies have different mission tasks and serve different populations of people. Generally speaking, as defined in Executive Order 13571, “government customer” refers to “any individual or any entity, including a business, tribal, state or local government, or other agency, to which the agency directly provides significant services.”\(^{132}\) To better serve its customers, the government needs to take into account the needs and preferences of both individuals and organizations.

Some government agencies and private enterprises choose to identify their employees as one of their groups of “customers.”\(^{133}\) This paper takes the position that employees of an agency or business are very important stakeholders in the organization's success and play very important roles in delivering superior customer service, but that it is preferable in most cases to treat employees as stakeholders rather than customers. On the other hand, there is merit to treating employees as customers when they are serving other employees, rather than people and organizations outside the FSA.

How Can Customer Service in Government be Improved (Best Practices)?

A. Customer Service Plan and Governance Structure

It is critical to develop a clear customer service strategy/plan to address how an agency improves its service delivery to meet the needs of customers. The purpose of a customer service plan is to set the overall direction an agency will take and ensures accountability and cooperation. President Obama issued an executive order in 2011 requiring agencies to develop and publish a customer service plan to improve customer experiences.\(^{134}\) Following the executive order, OMB issued a memorandum to assist agencies in developing customer service plans. According to OMB, agency customer service plans should clarify the nature and scope of agency services, identify key customer groups, and outline the approaches to “connecting with customers; setting, communicating and using customer service standards, and leveraging technology and innovation.”\(^{135}\)

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\(^{133}\) FSA cites employees as customers in the USDA Customer Service Plan. It is the only one of 5 referenced USDA agencies to do so.


cabinet-level agencies, including USDA, created and posted customer service plans to their websites in 2011.\textsuperscript{136}

The Study Team’s best practice research indicates the importance of establishing a formal governance structure to institutionalize an organization’s commitment to improving customer service. In its memorandum (June 2011), OMB states “each agency should identify a senior official, who will be responsible for the customer service plan and related agency goals...”\textsuperscript{137} The Partnership for Public Service published a report, The Road to Customer-centered Services, in February 2016. One of the recommendations in this report is that agencies should consider establishing a senior leader position (i.e., a chief customer experience officer) responsible for strengthening service delivery and customer experiences. The chief customer experience officer should have sufficient authority (i.e., reporting directly to the agency head) and support (budget & staff).\textsuperscript{138} A formal institutional structure helps ensure a more coordinated approach to improving agency-wides customer service, clarifies responsibility and accountability, and creates a better sense of ownership.\textsuperscript{139}

Achieving high levels of customer service is the responsibility of every employee, not just the “chief customer officer.” It is especially important to gain support from the agency’s top leadership to improve customer service, and in effect, build a customer-centric organizational culture.

B. Customer Service Standards

Agencies are required to “develop customer service standards that are understandable to the public, easily accessible at the point of service and on the Internet, and measurable.”\textsuperscript{140} Clear service standards inform customers of what to expect when receiving government services. Many agencies have established customer service standards based on their missions and needs.

\textsuperscript{136} The USDA customer service plan includes two pages on “Program Information and Signup for Farmers and Ranchers” at the Farm Service Agency. Id at 6-7. Only 5 of USDA’s 18 agencies are profiled. http://www.usda.gov/documents/usda-customer-service-plan-nov2011.pdf
\textsuperscript{139} It should be added that only 7 of 12 agencies interviewed by the Partnership for its report acknowledged having a plan for improving customer service and only 3 of those 12 reported having a senior leader responsible for the customer experience. The participating agencies are listed at the end of the report. This is just to note that much work remains to be done on this subject. Ibid p. 2 & 32
In a 2014 report, GAO\textsuperscript{141} reviewed the requirements of the Government Performance and Results Act of 1993 (GPRA)\textsuperscript{142} and the GPRA Modernization Act of 2010\textsuperscript{143}, and several executive orders and concluded that customer service standards of government agencies should include three key elements:

1) **Performance goals.** These are defined in the law as “a target level of performance expressed as a tangible, measurable objective, against which actual achievement can be compared.” A performance goal can be “expressed as a quantitative standard, value, or rate.”\textsuperscript{144} Agencies are required to set performance goals for service speed, quality/accuracy, and customer satisfaction.\textsuperscript{145}

2) **Performance measures.** Agencies’ customer standards should clarify how they measure their progress against performance goals and objectives.

3) **Public availability.** Agencies should communicate customer service standards to the public and report progress towards meeting the standards.

C. **Communications with Customers**

Numerous studies have emphasized the importance of customer engagement. Services provided by the government should be aligned with the expectations of the public. Agencies need to maintain regular communications with customers to understand their preferences and assess service performance accordingly. The first step to improving customer engagement is to develop a centralized framework/plan to organize an agency’s communication efforts (e.g., communication tools, frequency, content, etc.). A customer-centered organization proactively reaches out to its customers to address potential issues before they become major problems.

One of the key reasons people are not satisfied with government services is that they are not well-informed about the availability of services.\textsuperscript{146} To increase public awareness of government services, agencies should conduct regular outreach initiatives to engage the public when designing new services or making significant changes to current services. Agencies need to make their customer service information (e.g., customer service standards, performance evaluation, agency service contact information) easily accessible to the public.

\textsuperscript{141} Managing for Results, Selected Agencies Need to Take Additional Efforts to Improve Customer Service, GAO Report 15-84 (October 2014); [http://www.gao.gov/assets/670/666652.pdf](http://www.gao.gov/assets/670/666652.pdf) (note that in this report references to "FSA" are to "Federal Student Aid")

\textsuperscript{142} Public Law 103-62 (1993)

\textsuperscript{143} Public Law 111–352 (2011)

\textsuperscript{144} 31 U.S.C. §1115 (h) (9).


Customer satisfaction surveys (e.g., online survey, telephone survey, and paper-based survey) provide a useful tool for agencies to collect ideas on how to improve services. Both the Office of Personnel Management (OPM) and the Office of Management and Budget (OMB) have provided guidance on this subject that may be of use to individual agencies. OPM has issued government customer satisfaction survey guidelines to assist agencies in gathering reliable service performance information. OPM’s guidelines identify nine aspects of government services that are critical to customer satisfaction: service access, courtesy, knowledge, timeliness, reliability, choice, tangibles, recovery, and quality. In addition, OPM offers the assistance of its Assessment Services Branch to interested agencies. As part of OMB’s CAP initiative, a customer experience toolkit has been developed to provide resources and practical solutions to help agencies improve their service delivery. The toolkit includes a number of survey design best practices, such as survey methodologies, guidelines for developing effective survey questions, and examples of good and bad survey questions.

Various federal agencies and groups of agencies have implemented different types of customer surveys to collect service performance information. For example, four agencies (i.e., the Department of State, SSA, VA, and GSA) participate in a pilot program Feedback USA led by OMB to improve customer experiences by allowing customers to provide direct feedback after receiving services through a “feedback button” at a kiosk. Customers are asked to respond to a few quick questions, such as “how did we do today?” and “how would you rate your overall experience today?” Customers are also invited to provide more detailed comments through agencies’ websites.

In addition to surveys, there are a variety of communication tools available for the government to use to connect with its customers, such as newsletters (snail mail or email), customer events, and in-person customer focus groups. Communicating with the public in multiple ways increases the likelihood that people will pay attention and respond to the information.

While communicating with customers as such is important to providing good customer service, agencies also need to make the best use of the comments/feedback gathered from the public to improve services. Information overload is a challenge in today’s world. It is difficult for agencies to distill useful information from the large amount of data available to

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148 Ibid.

149 The cited toolkit is presented on YouTube as a PowerPoint presentation with narration by an expert from the Bureau of Labor Statistics. DigitalGov, *Designing a Better Customer Survey*, YouTube video, [https://www.youtube.com/watch?v=9VxW7mFZUc4&list=PLd9b-GuQ3nH7xSSIL1XBPvQw688NbwW&index=15](https://www.youtube.com/watch?v=9VxW7mFZUc4&list=PLd9b-GuQ3nH7xSSIL1XBPvQw688NbwW&index=15)

150 See generally, [https://feedback.usa.gov/about/](https://feedback.usa.gov/about/)

151 See generally, [https://feedback.usa.gov/about/](https://feedback.usa.gov/about/)

152 See generally, [https://feedback.usa.gov/ssa/](https://feedback.usa.gov/ssa/)
them.\textsuperscript{153} Many agencies have utilized data analytics to analyze customer data, assess service performance, anticipate potential problems, and further streamline work processes. Customer personas\textsuperscript{154} provide another tool that helps organizations use data to understand the needs of customers. Customer personas are fictional but nevertheless realistic representations of an organization’s major customers (e.g., who they are, what services they need, and how they receive services) and are built based on the quantitative and qualitative customer data collected from various sources. Building customer personas allows agencies to understand their customers as real humans and formulate service delivery strategies accordingly.

D. Workforce Issues

Achieving high-quality customer service requires a skilled, dedicated workforce. Customer service skills are considered important skillsets that government should look for when recruiting for positions that interact directly with customers. There are a number of essential customer service skills, such as clear communication skills, listening skills, conflict resolution skills, and interpersonal skills (e.g., empathy, patience, adaptability, etc.). As noted in the Partnership for Public Service report\textsuperscript{155}, it is often difficult to assess these “soft skills” by reviewing resumes. Some agencies have developed different methods (e.g., situational interview questions) to evaluate a candidate’s customer service competencies more effectively.

Agencies need to provide training programs to help employees develop and enhance their customer service skills. To hold employees accountable, customer service measures should be built into employee performance evaluations. Agencies should establish formal mechanisms to regularly collect comments from frontline employees. Frontline employees deliver services directly to the public, so they understand the needs of customers and are often able to offer suggestions for improving services.

Our best practice research also indicates that agencies need to create a positive work environment to increase employee satisfaction. An organization’s ability to retain employees has a significant impact on the quality of its services. “A dissatisfied employee is not usually a caring one, with businesspeople now working harder than ever, they have less time to think about morale in their workplace—the very thing they should be thinking about in order to boost sales and profits.”\textsuperscript{156} As noted in a 2015 OMB memo, “an important

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{153} Supra note 163.
\item \textsuperscript{155} Government for the People, The Road to Customer-centered Services, Partnership for Public Service (Feb. 2016) p. 29; http://ourpublicservice.org/publications/viewcontentdetails.php?id=934
\end{itemize}
\end{footnotesize}
.component of delivering service improvements is that front-line staff feels valued in work and see their efforts to deliver excellent service recognized and celebrated.”

E. Service/Technology Issues

Information technology innovations have transformed the way customers receive services. Customer attitudes and preferences are shifting. To meet customer expectations, organizations need to improve online services that allow customers to complete transactions faster and easier. An increasing number of government services have been moved online. For example, SSA currently offers 20 online services, and the agency’s website on average attracts 17 million visions every month. The Department of Veterans Affairs has implemented a web portal eBenefits to provide customer access to online services. As of June 30, 2015, the eBenefits portal had more than 4 million registered users. OMB established a cross-agency priority goal Smart IT Delivery to focus resources to improve customer satisfaction by strengthening IT development and management approaches, streamlining federal IT procurement process, and recruiting the best talent. The Obama Administration issued a Digital Government Strategy that includes three main objectives and an implementation roadmap to address the common challenges facing federal agencies as they improve online service performance. The objectives include:

- Enable the American people and an increasingly mobile workforce to access high-quality digital government information and services anywhere, anytime, on any device.
- Ensure that as the government adjusts to this new digital world, we seize the opportunity to procure and manage devices, applications, and data in smart, secure and affordable ways.
- Unlock the power of government data to spur innovation across our Nation and improve the quality of services for the American people.

Expanding government online services requires reliable websites and other digital platforms (e.g., mobile apps, social media). Best practice research identifies a number of key elements of government websites (and other digital platforms) that have significant impacts on customer satisfaction, including the organization of websites, the quality of

information, visual design, technical performance, and transparency. The Foresee E-
Government Satisfaction Index, which is based on more than 185,000 survey responses
from across the federal government’s websites, defines these “priority elements” of users:

- Content- The accuracy, quality and freshness of news, information and content on
  the website;
- Navigation- The organization of the site and options for navigation;
- Search- The relevance, organization and quality of search results available on the
  site;
- Look and Feel- The visual appeal of the site and its consistency throughout the site;
- Site Performance- The speed, consistency and reliability of loading pages; and
- Online Transparency- How thoroughly, quickly and accessibly the website discloses
  information about what the agency is doing.

Focusing on improving these key areas will help the federal government strengthen their
websites performance and improve customer experiences.

Improving online services is a main focus of the government. At the same time, in-person
service delivery will remain a preferred mechanism for many people. Agencies should take
advantage of modern technologies to improve the effectiveness and efficiency of in-person
services. For example, in a 2014 study, the Academy recommended that SSA expand the use
of self-service options (e.g., kiosks) and videoconference technology to reduce the volume
of transactions and achieve efficiency gains at field offices. Additionally, better electronic
data access and greater automation would make in-person service more efficient.

As recognized in many agencies’ strategic plans/performance reports, government needs
to provide services through multiple channels to meet the needs of different customer
groups. This is clearly a case in which one size does NOT fit all. In its Vision 2025, SSA
states “customers have choices in terms of when, where, and how they receive services....
we satisfied an inter-generational customer base with a range of preferences in technology
and interactions, by offering a variety of service delivery methods.” Government
agencies should integrate and coordinate service delivery across multiple channels to
provide a seamless customer experience.

Conclusion

Providing high-quality customer service has become a top priority for the federal
government. This paper highlights a number of promising practices for agencies as they
strive to improve customer experiences, including preparing customer service plans,

163 National Academy of Public Administration. Anticipating the Future: Developing a Vision and Strategic Plan
publications/1633-anticipating-the-future-developing-a-vision-and-strategic-plan-for-the-social-security-
administration-for-2025-2030.html

164 “Customer relationships span a lifetime and are supported by access to accurate, real-time, and secure
information and services,” Social Security Administration; https://www.ssa.gov/vision2025/customer.html
establishing a formal governance structure, developing strong customer service standards, maintaining effective customer communication, recruiting and developing employees with excellent customer service skills, improving online services, and integrating service delivery across multiple channels. The purpose of our best practice research is to help government agencies learn from the experiences of others, replicate successes, and avoid mistakes.
# Appendix G: Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>ACRSI</td>
<td>Acreage and Crop Reporting Streamlining Initiative</td>
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<tr>
<td>ARC</td>
<td>Agriculture Risk Coverage (revenue loss prevention)</td>
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<tr>
<td>BPMS</td>
<td>Budget Performance Management System</td>
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<tr>
<td>BTO</td>
<td>Bridges To Opportunity</td>
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<tr>
<td>CED</td>
<td>County Executive Director</td>
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<td>CIO</td>
<td>Chief Information Officer</td>
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<td>CRM</td>
<td>Customer Relations Management</td>
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<td>DAFO</td>
<td>Deputy Administrator for Field Operations</td>
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<td>ERS</td>
<td>Economic Research Service</td>
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<td>FCC</td>
<td>Federal Communications Commission</td>
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<td>FSA</td>
<td>Farm Service Agency</td>
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<td>FSFLP</td>
<td>Farm Storage Facility Loan Program</td>
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<td>GAO</td>
<td>Government Accountability Office</td>
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<td>GPS</td>
<td>Global Positioning System</td>
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<td>IT</td>
<td>Information Technology</td>
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<td>NACS</td>
<td>National Association of Credit Specialists</td>
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<td>NADD</td>
<td>National Association of District Directors</td>
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<td>NAP</td>
<td>Non-insured Disaster Assistance Program</td>
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<td>NASCOE</td>
<td>National Association of State and County Employees</td>
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<td>NASE</td>
<td>National Association of FSA Support Employees</td>
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<td>NRCS</td>
<td>National Resources Conservation Service</td>
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<td>OIG</td>
<td>Office of Inspector General</td>
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<td>OMB</td>
<td>Office of Management and Budget</td>
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<td>OPSE</td>
<td>Office of Program Education and Stakeholder Engagement</td>
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<td>OPM</td>
<td>Office of Personnel Management</td>
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<tr>
<td>OTIS</td>
<td>Outreach Tracking and Information system</td>
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<tr>
<td>PLC</td>
<td>Price Loss Coverage (revenue loss prevention)</td>
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<td>RD</td>
<td>USDA Rural Development</td>
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<tr>
<td>RMA</td>
<td>Risk Management Agency</td>
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<tr>
<td>SED</td>
<td>State Executive Director</td>
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<tr>
<td>USDA</td>
<td>United States Department of Agriculture</td>
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<tr>
<td>webRFS</td>
<td>Web Receipt for Service</td>
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</tbody>
</table>
• **Top left image:** The Mahantango Creek Watershed near Klingerstown, Pennsylvania, shows the patchwork quilt of forest, farmland, and other land uses typical of watersheds. ARS scientists at University Park, Pennsylvania, are applying lessons learned from this watershed to their CEAP studies of New York's Town Brook Watershed. Photo can be found at the Agricultural Research Service's Image Gallery: [http://www.ars.usda.gov/is/graphics/photos/dec05/k5051-8.htm](http://www.ars.usda.gov/is/graphics/photos/dec05/k5051-8.htm)

• **Top right image:** Fresh cut fruits and vegetables. Photo can be found at the Agricultural Research Service's Image Gallery: [http://www.ars.usda.gov/is/graphics/photos/dec99/k8666-1.htm](http://www.ars.usda.gov/is/graphics/photos/dec99/k8666-1.htm)

• **Bottom left image:** USDA has combined field office locations of many agencies within the department into one central Service Center, creating a one-stop-shopping network for farmers, ranchers, and other customers. Photo can be found at the Natural Resources Conservation Service's Photo Gallery: [https://photogallery.sc.egov.usda.gov/netpub/server.np?find&catalog=catalog&template=detail.np&field=itemid&op=matches&value=2651&site=PhotoGallery](https://photogallery.sc.egov.usda.gov/netpub/server.np?find&catalog=catalog&template=detail.np&field=itemid&op=matches&value=2651&site=PhotoGallery)

• **Bottom right image:** A district conservationist inspects compost made from manure and other organic solids. Photo can be found at the Natural Resources Conservation Service's photo Gallery: [https://photogallery.sc.egov.usda.gov/netpub/server.np?find&catalog=catalog&template=detail.np&field=itemid&op=matches&value=961&site=PhotoGallery](https://photogallery.sc.egov.usda.gov/netpub/server.np?find&catalog=catalog&template=detail.np&field=itemid&op=matches&value=961&site=PhotoGallery)