



Farm Aid
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RE: OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance

Farm Aid submits these comments in strong opposition to the proposed revisions to the Office of Management and Budget's (OMB) Guidance for Federal Financial Assistance in Title 2 of the Code of Federal Regulations (CFR), subtitle A (OMB-2026-0034, Office of Management and Budget (OMB) Regulation for Federal Financial Assistance).

Farm Aid is a nonprofit organization whose mission is to build a vibrant, family farm-centered system of agriculture in America. For more than 40 years, we have worked alongside family farmers and ranchers, helping them navigate financial hardship, access critical resources and remain on their land. Farm Aid operates the only national farmer hotline, providing support services to farm families in crisis and connecting farmers to trusted resources. This work is supported, in part, by the Farm and Ranch Stress Assistance Network (FRSAN), a USDA-NIFA program. Additionally, we receive funding through the Distressed Borrowers Assistance Network (DBAN), a USDA-FSA program, to provide support to farmers in financial distress and to connect farmers to resources, including legal, financial and mental health assistance. Farm Aid's work has kept family farmers on the land and created new farmers; increased access to healthy, fresh food for all; helped to revive rural and urban communities; and grown local and regional food systems that stimulate local economies.

These investments have produced results that are both measurable and intangible. Since receiving our USDA-NIFA award in 2021, Farm Aid's hotline has assisted over 3,700 farmers who were in crisis or need of support, and helped over 6,000 more through our organization's online resource network. In just one year of our USDA-FSA award, Farm Aid and our grant partners provided individualized technical assistance to assist more than 25,000 farmers, connected over 600 farmers with vital resources and trained over 100 farmers and technical assistance providers with skills to support financially distressed farmers. Additionally, Farm Aid has been able to provide both emotional and psychological support to farmers in times of challenge and crisis. To meet these critical needs, we have expanded our staff by seven experts, strengthening our organization's administrative capacity to develop appropriate programming. These are significant but necessary investments enabled by our grant awards.

The proposed revisions would deeply undermine Farm Aid's ability to assist farmers by making it difficult to maintain partnerships and forcing us to rely on contract terms that are not well defined. Partnerships are essential for our work; we rely on regional partners who have direct relationships with farmers to effectively carry out our work on a national scale. We are specifically concerned about the interpretation and compliance of the "elevated programmatic risk" (§ 200.208) and "activities inconsistent with federal civil rights laws" (§ 200.330) standards, which would make it difficult to enter into secure partnerships.

We are equally concerned that the additional documentation requirements (§ 200.302, § 200.305), reimbursement procedures (§ 200.208), and compliance requirements (§ 200.300) would create burdensome administrative costs, put our organization in a potentially financial precarious position, and require staff time, training and resources to be redirected away from farmer support work to contract compliance. It is essential that OMB clarify how the proposed rule and provisions would apply to current participants of USDA programs.

The investment of federal funds into programs like FRSAN and DBAN, and other programs administered by our partners, is crucial for farmers and ranchers across the country. The proposed rule, especially without more clarity from OMB, would greatly impact America's farmers in negative ways that could disrupt our food system for generations. On behalf of our organization, thank you for considering our input.