



August 14, 2021

The Honorable Tom Vilsack
United States Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W. Washington, DC 20250

Director Elizabeth C. Archuleta
Office of Intergovernmental & External Affairs
U.S. Department of Agriculture
1400 Independence Ave., S.W. Washington, DC 20250

Docket #: USDA-2021-0006

Dear Secretary Vilsack and Director Archuleta,

On behalf of the Pennsylvania Department of Agriculture, we thank the United States Department of Agriculture (USDA) for the opportunity to respond to the request for comment on how the USDA can advance racial justice and equity for underserved communities. This continues to be a top priority at the Pennsylvania Department of Agriculture (PDA) as we look to improve diversity, equity, and inclusion both internally and externally. Agriculture is the largest economic enterprise in Pennsylvania, making it critical that we, along with our federal partners, ensure that our programs and outreach are equitable and culturally competent. We hope that our comments can enhance and expand the valuable services that USDA provides to agricultural stakeholders across the country.

Section: General Questions

3. Did you experience problems with required USDA paperwork, the USDA internet sites, the attitudes of USDA workers, or the locations of USDA offices?

- The 15 to 30 day time allotted for comments or request for information can be challenging, especially for first time applicants.
- USDA should establish Farm Services Agency offices or some kind of USDA-liaison office within major urban centers to provide outreach and support to urban farmers and growers. Even when a USDA office exists in neighboring counties, urban growers within the urban center may not be aware those offices exists or have the ability to reach those offices easily due to lack of public transportation to those areas outside the city.

4. Are there USDA policies, practices, or programs that perpetuate systemic barriers to opportunities and benefits for people of color or other underserved groups? How can those programs be modified, expanded, or made less complicated or streamlined, to deliver resources and benefits more equitably?

- We Recommend creating a policy fellowship at USDA agencies in partnership with Historically Black Colleges and Universities, Historically Hispanic Serving Institutions (HSI), diverse affinity

groups like the Minorities in Agriculture, Natural Resources, and Related Sciences (MANRRS), and other historically underserved communities to provide direct access and placement in leadership positions.

- Eliminating match requirements for USDA grant programs (I.e. GusNIP, etc.) would enable the communities with the most need to more readily access and utilize these opportunities.
- USDA should evaluate the ways that it can encourage states to provide equitable opportunities to advance racial equity and justice from state-administered, federal funding, through contract requirements or best practices.

5. How can USDA establish and maintain connections to a wider and more diverse set of stakeholders representing underserved communities?

- USDA can partner with state commissions and departments in this effort whenever possible, including building relationships and facilitating connections.
- There are very few BIPOC Certified Agricultural Educators. USDA should develop supporting programs to encourage and increase the number of BIPOC Certified Agricultural Educators. Students interested in agricultural careers, especially in urban centers, can better connect and engage with educators who have similar backgrounds and experiences. This is another area in which BIPOC communities have been excluded from due to socio-economic and institutional racism.

6. Please describe USDA programs or interactions that have worked well for underserved communities. What successful approaches to advancing justice and equity have been undertaken by USDA that you recommend be used as a model for other programs or areas?

- USDA should continue to provide tools like the USDA Food Atlas to assist communities in need to better express their needs.

10. How can USDA use technology to improve customer service? Do you have suggestions on how technology or online services can help streamline and reduce regulatory or policy requirements? What are those technological programs or processes and how can USDA use them to achieve equity for all?

- The webinars provided by USDA to explain the individual grant application process is helpful, but it can be challenging to find the webinars and navigate the federal website, even if a prospective applicant knows about the grant opportunity. Better promotion of the grant opportunities and clear online pathways to find grant opportunities and archived webinars would be helpful, as well as including translation options and diverse sign language interpreters to increase accessibility of the webinars.

11. Are there sources of external data and metrics that USDA can use to evaluate the effects on underserved communities of USDA policies or regulations? If so, please identify or describe them.

- Conducting and publishing an inventory of USDA grant awards by zip code would allow the agency to determine where it is investing funding and evaluate levels of investment in underserved communities. In Pennsylvania, the Department of Environmental Protection has defined Environmental Justice (EJ) Areas as “any census tract where 20 percent or more individuals live at or below the federal poverty line, and/or 30 percent or more of the population identifies as a non-white minority, based on data from the U.S. Census Bureau and the federal guidelines for poverty. EJ Areas are mapped on DEP’s EJ Areas Viewer at



dep.pa.gov/EJViewer. There is not a federally recognized definition of Environmental Justice Areas.

12. What suggestions do you have for how USDA can effectively assess and measure its outreach and inclusion of underserved groups and individuals?

- USDA can continue to increase the diversity of its boards and commissions.
- USDA can connect with national affinity organizations to share information about its programs and explore new opportunities for partnerships.

14. Have you made recommendations for improvement in the past to USDA? If so, please list or attach those recommendations.

- The PA Department of Agriculture submitted comments for the interim and final hemp rules that encouraged USDA to work with Congress to pass legislation to lower the 10-year ban on participation in the hemp industry if a participant has been convicted of felony drug-related charges. We believe this is an unfair burden to prospective growers and that it has a disproportionate impact on communities of color. The interim final rule does not regulate processing of hemp, and the fact that the drug-related conviction ban only applies to prospective growers further exemplifies the inequity of this provision.
- The PA Department of Agriculture provided USDA its [COVID-19 Fresh Food Financing Initiative program guidelines](#) as a recommended model for spending additional American Rescue Plan dollars. The program prioritized Black, Indigenous, and Person of Color (BIPOC) owned businesses and those businesses that serve BIPOC communities. The program was very popular and oversubscribed in Pennsylvania in 2020, so we believe it could be a model implemented at the federal level or delegated to the states to implement.
- In 2020, the PA Department of Agriculture advocated to the Pennsylvania Congressional delegation that Congress should ensure the prioritization of new and beginning farmers, farmers of color, veteran farmers, and small and diverse businesses to require they equitable access to federal programs and resources in stimulus programs and COVID-19 recovery efforts. We encourage USDA to continue to work toward these goals in all of their programs.

The PA Department of Agriculture supports USDA's efforts to evaluate and improve access for underserved producers and communities. We are happy to answer any questions you might have and are eager to assist USDA in these efforts.

Sincerely,

A handwritten signature in blue ink that reads "Russel C. Redding".

Russel Redding , Secretary
Pennsylvania Department of Agriculture
2301 N Cameron St, Harrisburg, PA 17110