



The National Association of Farmer Elected Committees

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Dear Administrator Fordyce:

I don't understand why the COC can't function like the other CO employees that have been asked to return without pay. On the conference call 1-23-19, DC talked about county offices and CO employees that would answer to their supervisor. The county committee is the CED's supervisor. In order for FSA to function, we suggest:

- COC time and attendance can be kept manually
- COC travel can be recorded manually
- COC can be paid for time served in meetings and for travel when appropriations are approved just like COF staff

The primary concern of NAFEC is that CEDs cannot do their jobs at this time.

- Delegations of authority are obsolete in the case of newly elected members to the COC
- Delegations of authority are obsolete in the case of newly hired CEDs
- Delegations of authority may not have been made at all on some programs and without COC approval, the very payments needing to be made cannot be approved

Additionally, COC are the leave approving officials for CEDs. In the case of a CED not being able to report due to hardship, doctor's appointment, illness, etc., COC should be aware of and approving those absences. Secretary Perdue has stated that the purpose of this call-back is to alleviate the hardship that the government shutdown is creating on cash-flow for the farmers and ranchers of America. Program payments cannot be made without the applicable approval of COC.

NAFEC requests that the FSA County Committee be included in the call-back as excepted employees. This looks like the best answer. This would guarantee that the checks and balances to maintain integrity and prevent fraud remain in place.

For almost 85 years local FSA offices and the county office system have done an exemplary job of providing service to producers. This system, dependent upon local farmers and ranchers delivering the USDA programs themselves, has made the Secretary's motto of "Do Right and Feed Everyone" a reality in America.

NAFEC supports the decision to open up county offices to provide service to farmers and ranchers. NAFEC requests that COC be included in this call-back.

Thank you,
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The National Association of Farmer Elected Committees is a non-profit organization composed of and led by farmers, nominated and elected by farmers, and serving all farmers in each of their county USDA Farm Service Agency offices. To learn more about NAFEC or to join please go to <http://nafecfsa.com>

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