

2023 NASCOE Negotiation Items Responses

ITEM 1:

Issue:

Policy and best practices require that county office staff assist each other, both in day-to-day operations and by serving as a back-up in program areas. 27-PM (Rev 2) has the following required language for grade CO-4 and CO-5 positions descriptions (Ex 15, Pg 7): "Assists other County Office employees by performing specific, routine segments of broader program operations for which another employee is responsible. Assignments are designed to improve overall knowledge of the County Office operations." The incumbent may serve as a back-up in one or more program areas in the absence of the employee responsible for the program or programs." This is not listed as required or optional for grade CO-6 and CO-7.

State offices are informing supervisors they are not authorized to include this modification in position description language.

Position:

Since supervisors do not have the authority to make the needed modification in position description language, 27- PM (Rev. 2) language should be amended to require that CO-6 and CO-7 position descriptions state "Assists other County Office employees as needed and serves as a back-up in one or more program areas." Without this being clearly stated in the position descriptions, CO-6 and CO-7 employees may not understand that providing assistance, or being a back-up to other employees, is part of their position responsibilities. Additionally, without this language being included, it would put the supervisor in a difficult position to hold the employee accountable.

We respectfully request that Handbook 27-PM (Rev. 2) Exhibits 12, 13, and 14 be amended to include the language under CO-6 and CO-7 "Primary Duties" section to state "Assists other County Office employees by performing specific, routine segments of broader program operations for which another employee is responsible. Assignments are designed to improve overall knowledge of the County Office operations."

FSA Response:

This language is included in the Grade 4 and Grade 5 position descriptions because these PTs do not yet have independent responsibility in a program. The higher graded PT position descriptions do include language "Performs other duties as assigned", which allows CEDs to require PTs to assist in other program areas. If the assistance in another program area is regular in nature, that program can be added under the primary duties section.

Resolution:

NASCOE accepts this response.

ITEM 2:

Issue:

COF employees recently received their annual notifications of awards by mail and/or notifications of cash awards when a bank deposit appeared in their bank accounts. Unbeknownst to these employees they did not know these types of awards were coming to them. This information was a surprise, because the employees felt it lacked sincerity being mailed and not being notified beforehand that it was coming or that an award was being issued until its arrival in the mail. Some employees took it upon themselves to help celebrate their own achievements. This is the submitters personal account with a situation in the field:

“Last year, a package was delivered to our county office from our state office. In it was a certificate of recognition for serving 15 years addressed to my CED. That is it? She was not in the office that day, so I placed it on her desk. It bothered me all day, so I personally made her a personal Congrats card and went out and bought some small fake flowers and taped them to it and displayed the card with her certificate on her desk. (Which do you think she appreciated more?) Not once did she get recognized for it...not in All employee MS Teams meetings, not a phone call from State Office, nor from District Director...nothing. After 15 years, that's IT?

Also, since I have been here, I have appreciated the Cash/Time off awards I have received; however, I'm sure that everyone who receives them, gets it the same way I have, so I am not speaking for myself, but for all employees because I feel we all deserve more. We get a random deposit to our bank account that does not have any other description, other than what we see when we get our regular pay (AGRI TREAS FED SAL). I/we assume it is the cash award, but how much more impersonal can it be? We are the ones who make this agency function - as a team. I am sure I also speak for all offices of this agency in saying that the workload and expectations of all of us is very, very high and I think that although money is always appreciated, there should be other ways of recognizing offices, or individuals for going above and beyond, etc. We are giving so much money to our customers, but our budget does not allow for Employee Recognition.”

Position:

FSA has recognized the importance of acknowledging and celebrating the hard work of our employees with generous award funds in recent years. However, the delivery and presentation of these at times has not been as effective in conveying this appreciation as it could otherwise have been. NASCOE would like to see greater emphasis provided to supervisors on employee recognition in the CEDT training and in the COC training. Our employees are the heart of the agency, and we believe that with showing appreciation for years or service or an outstanding job above their normal duties would boost employee moral nationwide.

NASCOE understands that there is a small section on recognition in the National Leadership training, however NASCOE believes an annual training would be beneficial.

FSA Response:

The agency agrees to update CEDT training and COC training to include a greater emphasis on employee recognition. Employee recognition has also been a focus of the workforce engagement (WE) committees and a draft notice is currently in the works. Upon finalization of this notice, DAFO will provide a training for all supervisors on employee recognition.

Resolution:

NASCOE accepts this response.

ITEM 3:**Issue:**

Policy regarding time and attendance approval for employees without computer access is obsolete. This includes guidance for documenting the COC approval of CED timesheets and leave as well as the COC Chairperson's approval of regular COC members.

While the DD loads COC approvals into WebTA, the approval themselves are documented using the FSA-958 for time and attendance and OPM-71 for leave. The FSA-958 has been obsoleted on the FSA forms website with no alternative put in place.

17-PM dictates the policy for requesting leave and setting schedule. It has not been updated since 2011 and does not incorporate any of the changes that were incorporated with WebTA. FPAC has issued updated guidance about work schedules, but authority for the COC remains with FSA and thus should be in the handbook.

Notice PM-2722 was released which outlined the instructions for employees to use WebTA. Paragraph 2A states that employees shall continue to submit a hardcopy work schedule, leave requests, and premium pay requests.

Unless delegated, FSA policy almost universally requires COC approval to be documented on paper to justify the loading in software. This is true for NAP payments, Recons, MAL/FSFL approvals, etc. Obviously, this is challenging for the COC who does not have computer access.

Notice PM-2763 was issued in 2010 which specifically addressed CED's and the challenges with COC's not having level 2 eAuth access. That states that the OPM-71 shall continue to be submitted to COC. It states that there will be no change in the supervisory authority of the COC and that DD's will take necessary actions in WebTA but are not authorized to overturn or affect decisions made by the COC on CED T&A matters, except in unusual circumstances.

Position:

The information contained in PM-2763 needs to be re-issued and/or permanent policy incorporated in the handbook. FSA-958 needs to be made current and available on the FSA forms website or an alternative option issued that is current for use.

The recommendation by the submitter has merit. COC members usually do not have level 2 eAuth access and cannot review or approve transactions through WebTA. The COC provides their time and attendance information only by submitting signed copies of FSA-958 each time they meet which is then reviewed by the timekeeper and approved by the COC Chairperson (DD reviews the Chairperson's FSA-958). 17-PM handbook procedure is in dire need of being brought up to date with current software. Also, the contents of Notice PM-2763 need to be reissued or placed into handbook procedure confirming the COC's authority regarding time and attendance and the ability to redelegate WebTA authority to the DD.

FSA Response:

The 17-PM Handbook is next on DAFO's priority list of PM Handbooks to update. OPM-71 is no longer a required form. COCs can sign WebTA PDFs/printouts or simply just note in COC minutes review and approval/disapproval of WebTA leave requests. COCs can also still redelegate WebTA authority to the DD.

Resolution:

The form AD-2001 now trumps our previous 17-PM policy regarding the work schedule policy. Although FSA is still working to express the importance of FSA Handbooks to the FPAC-BC and a need for correction/clarification on policy. The handbook updates are the top priority of DAFO and are being actively worked on. This policy can be part of the 17-PM amendment rather than a notice being issued. NASCOE will have the opportunity to review the policy prior to the completion of the amendment.

ITEM 4:**Issue:**

Acreage reporting can be a chaotic time for county offices with the request from producers to provide them with a copy as well as scanning their insurance agent a copy of their acreage report. Adding the Xerox add-on service, "**Scan with Print**" would be a time saving measure for county office employees who are already overburdened during this season.

Position:

NASCOE believes the "Scan with Print" service would be beneficial for county offices, especially for programs such as acreage reporting. According to national policy in 2-CP (Rev. 16) subparagraph 25D, Step 9, FSA offices are required to provide producers with a copy of their acreage report. Additionally, an increasing number of insurance agencies are requesting the acreage reports of their customers be emailed to them. This additional Xerox service will also be beneficial as we transition into the digital records management system, thus allowing

us to make a copy for the producer and simultaneously scan it to upload to our digital records system. Below is a link to the Xerox add-on services.

https://appgallery.services.xerox.com/?_gl=1*1w7wktj*_ga*OTI5MTIwMTI3LjE2NTgxNTE3NTI.*_ga#!/home/app-details/1b03b385-def6-484b-8159-05dd61a26ae8

FSA Response:

FSA and FPAC as a whole, are working with CEC & Xerox to determine feasibility of adding this feature to the current contract and what added costs may be incurred by the agencies.

Resolution:

CEC has provided that the MPS3 printers will be adding this feature at no extra cost to the agency. Rollout of this function is expected in August 2024.

ITEM 5:

Issue:

There is a severe lack of training and safety equipment for keeping county office employees safe when inspecting grain bins for multiple farm program and loan purposes. It is a crucial part of all county offices, yet not every office has been equipped with basic safety equipment and training to perform their job duties safely.

Position:

NASCOE is requesting that there be training videos developed on the proper techniques for inspecting grain bins. This would include knowing what signs to look for to ensure that the grain bin is safe to approach and climb. There also needs to be training on how to safely descend inside of a grain bin and prevent any catastrophic incidents. We are fortunate to have employees from all backgrounds and this means that some people inspect grain bins without any prior training.

National FSA handbook 1-FSFL Par. 171 Sect. B provides minimal information about safely inspecting FSFL structures. It references FSA handbook 5-LP Par. 89 which is the commodity inspector's handbook. While it contains some helpful information, it uses terminology that may be new to employees that have never previously received safety training. This handbook is severely outdated as it was last updated in 2017, and it references an OSHA informational booklet from 1996 that begins with "This informational booklet is intended to provide a generic, non-exhaustive overview of a particular standards-related topic." This 5-LP safety handbook is not referenced in the handbook for MALs which require commodity measurements in grain bins.

Current employees have informed us that they have gained knowledge from personal experiences and discussions with coworkers but being provided training from industry experts would help all employees feel comfortable using equipment and conducting the inspections.

NASCOE's other request is that all county offices be provided with the proper safety harness for safely climbing grain bins. 1-FSFL references "utilizing proper safety equipment, if

available”, but every office should be equipped with a safety harness and training on how to wear them. There is incredulous disparity across the nation regarding safety equipment availability. NASCOE would like to see a national directive issued that would make states accountable for the purchase and training for the safety equipment.

FSA Response:

Recently, DAFO made funds available to all states for specifically purchasing safety harnesses. Price Support Division (PSD) will develop a grain bin safety training program by April 2024, specifically for employees working with the FSFL and MAL programs. Handbook 8-LP will also be updated in the next handbook amendment to reference the 5-LP safety handbook.

Resolution:

DAFP is in the process of updating 8-LP and 5-LP with the safety standards. DAFO did provide states with money for safety equipment a couple years ago, so they will follow up with a SED/AO call to remind states of the funds available. DAFP will look into expanding on the training requirements in the current notice and express the options for in person trainings that states can offer.

ITEM 6:

Issue:

The File Maintenance and Disposition Manual and FSA handbook 32-AS contain inconsistencies and are incomplete, which makes researching proper filing difficult and time consuming. County and State Offices need additional resources, guidance, and training for utilizing the filing system, particularly regarding annual labels for program purposes. The employees need more refined instructions as to what labels are required on each individual program file and specific examples as to which forms are to be filed in each folder. New employees spend valuable time reading through all available resources and are still unable to find where to file reports or specific forms. FSA needs to have user-friendly instructions so employees are not using time inefficiently to research how to perform administrative tasks that should not be so complicated.

Position:

With many new employees onboarding and the transition to digital records, it is critical that FSA record guidance is consistent across all handbooks and manuals. Therefore, NASCOE is requesting that a national training be developed on Labeling System Guidance that would include what items are to be filed in each folder, how to label every folder, which records must be kept in locked cabinets, etc. We feel it would be beneficial to have county office employees on a Records Management Task Force to develop and deliver curriculum for this training. This specific request for training was negotiated in 2020 and the National Office concluded they would allow a pilot program with 2 NASCOE members on the program. NASCOE would like an update on that request.

NASCOE also feels strongly that the File Maintenance and Disposition Manual needs to include more information such as which forms and reports should be filed in each folder. Program

Technicians are often at a loss for where a form must be filed. We believe it would be very helpful if filing procedures were included in each applicable handbook, or program notice, if a handbook is not available. If these filing procedures can be provided for handbooks, we would respectfully request that procedures be merged into applicable handbooks as a handbook revision, instead of a handbook amendment.

Some examples of forms and reports that are not provided a defined folder location in the File Maintenance and Disposition Manual are:

- LDP's
 - One folder is labeled as “file correspondence about the LDP program too broad to be filed under 1 of the more specific subjects in this series”
 - The second folder is for individual LDP folders for each producer that is participating in an LDP program.
 - However, COFs are required to file information, such as COC approved yields for LDPs, as well as information provided from other sources like a cotton marketing association. All this information would have to be filed in the same folder, according to current guidance.
- Compliance
 - Folder CPPF-1-A is labeled “Progress Reports” and the folder description is, “Progress reports and related correspondence about the status of County Office compliance activity”, but no specific reports or forms are listed.

Another example that could fall under many program areas is, a register. Registers for program deadlines aren't listed in a specific location and therefore, are filed differently for each county office. It seems, the original intent of the 25-AS, was to maintain filing consistency across all county offices, and allowed for ease of finding files when County Office Reviewers (COR) physically visited COFs to complete reviews. While we recognize CORs no longer physically visit COFs, we still believe there is a necessity for uniform filing as COFs transition from seasoned employees to new employees, who are now trying to locate documents from past years during a remote review. With these reviews being completed 2-3 years after the program was administered, and with our high employee turnover rate, many times the employees trying to locate these files weren't in the COF at the time the program was run. Therefore, they could benefit from a more specific filing guide, like 25-AS.

These examples are just a few that highlight the office need and that is why NASCOE is requesting additional resources, guidance, and training for utilizing the filing system properly.

FSA Response:

FPAC Records Management is currently working with each of the FSA Deputy Areas as well as Office of Management and Strategy (OMS) to amend and update Handbook 32-AS and the adjoining 32-AS Supplement, File Maintenance and Disposition Manual. The first in a series of Handbook 32-AS amendments is in clearance with more to follow in the new year. In addition, 32-AS Supplement is currently under revision. Discussions are ongoing between DAFO and Records Management on the formation of an employee working group specific to

records management. Once formed, this group can review items such as 32-AS supplement, filing guidance, and other records management tools.

Resolution:

All records management is now in the FPAC-BC and has been a slow start; however, the FPAC-BC is now holding monthly meetings with STO staff to update this process. There is a push to update 32-AS as it is in the works to help with the field office filing issues. A working group is in place and NASCOE will be asked to have a representative.

ITEM 7:

Issue:

The County Offices within FSA struggle to find and keep talented workers. A CEDT recently had the chance to participate in numerous interviews for PT positions. When a candidate was chosen, it appeared that the applicants were declining the position because of the pay. Numerous times, highly qualified applicants decline FSA jobs because of the pay, and county offices struggle to fill positions—and occasionally many positions within offices. Some offices only have a CED in place and no program technicians. According to the feedback we are receiving from prospective applicants and departing employees, our pay is not competitive with that of the private sector. In addition, the level of work complexity for our positions is significantly higher than that of many comparable or higher-paying jobs in the private sector. Without a competitive pay scale, it will be difficult for USDA/FSA to attract and retain quality employees, which could ultimately impact the effectiveness of delivery of programs.

Position:

The USDA/FSA should get started right away on creating a plan to update the pay scale that will help with quality employee hiring and retention. Even while we provide fantastic benefits like a TSP matching up to 5%, a federal pension, health, vision, and dental insurance, as well as a sizable amount of leave earned for day one, benefits don't cover the daily living expenses. It is critical to recognize that the private sector has been providing better compensation packages, making it challenging for us to compete. To ensure that our employees are paid fairly with those provided in the private sector, we must reevaluate our current policies and make the necessary adjustments. By offering competitive salaries, FSA County Offices can create a positive work environment that fosters employee satisfaction and productivity. This, in turn, can lead to better service delivery and increased customer satisfaction.

This is especially important given the competitive job market and the need for skilled professionals in the agricultural industry. We must work hard to find talented applicants while keeping our seasoned employees, in whom we have invested a lot of training and experience. This will not only help us retain our current employees but also attract new talent to our organization. It is crucial for us to offer pay competitive in our workforce and create a positive work environment that values and supports our employees for the success of the agency's mission.

FSA Response:

As reported by the Administrator, FSA has been assessing a CO Program Analyst position and has taken a number of other actions related to pay and retention. In FY 2023, over 900 SLRP payments were issued to FSA employees in recognition of the retention challenges we are facing. DAFO has also recently held SED workgroups focused on recruitment and retention to brainstorm actions that we can take to help address concerns.

DAFO has also approved 12 superior qualifications appointments since the beginning of FY 2023 to bring new hires who had declined a position because of pay, and who had higher salaries, into a higher step of the grade. While these numbers are still small, they are more than quadruple the number submitted in FY 2022. We have provided training in FY 2023 and FY 2024 to hiring managers and state offices on the use of this hiring tool.

Resolution:

Announcement of Program Technician (CO) reclassification is greatly appreciated and NASCOE appreciates the work of all those working on this task.

ITEM 8:**Issue:**

County offices are continually contacting producers for various reasons and have discovered when we send out mass text messages, we are receiving a tremendously positive response from our customers/producers. With most producers having cell phones, and spam calls being rampant, producers do not always answer calls from unknown numbers. However, when producers are sent a text message, a large majority of our producers who have signed up for text alerts will contact the office quickly to make an appointment or refer back to it for programs deadlines. Overall, county offices would like more ways or guidance on how we can communicate with our producers using either email to text option(s) or our available communication systems, like GovDelivery, to a send text to individuals and/or a particular group of producers.

Position:

NASCOE would like to see the capabilities in GovDelivery or email to text capabilities to be expanded or permission to use to include an option to text producers individually as well as being able to send text messages out to a selected program participant group. This would be similar to how FLP has been able to send out bulk messages in some states to their targeted audience. Current guidance with GovDelivery allows only two text messages per month to be sent out, which limits us during a time when so many programs are being administered by FSA. NASCOE would like to see the number of text messages allowed to be sent per month to be increased or more options made available to send these types of texts via email. Also, county offices would like more guidance, alternative resources and/or permission on how to achieve this type of communication.

FSA Response:

The Office of the Administrator has initiated conversations with the Office of the Chief Information Officer, to identify the best path forward to reach the desired goal. Once a path forward has been approved, the agency will develop governances and guidelines to ensure producer privacy protection.

Resolution:

Brenda Carlson, National Strategic Communications Coordinator for FSA's Office of the Administrator, updated NASCOE that this is one of her priorities and the process has been started. Her goal is to get an FSA Leadership Decision memo signed out by August and roll out the option of communication guidance by the end of the year. If this timeline changes, she will update DAFO front office staff or NASCOE directly. DAFO will revisit the Bookings Software Pilot reports to see what can be addressed to make this used by the agency nationwide.

ITEM 9:**Issue:**

Employees must provide a receipt for any USDA service or benefit received via any form of contact, including in- person visits, phone calls, emails, digital visits, faxes, mail, and field visits, etc. When a producer signs a document using the OneSpan application, the county office must then make a receipt for service in the RFS (Receipt for Service) application. When you consider the time of the county office staff and the volume of work, using two different applications to receive signed documents can be a time-consuming process.

Position:

Therefore, NASCOE recommends looking into integrating the One-Span and RFS applications that can handle both. NASCOE recommends moving forward with having the RFS option integrated into all the program software like the ARC/PLC and CARS software that has been recently created. This will streamline the process and save time for both the employees and the producers.

FSA Response:

FSA is actively integrating RFS with other FSA systems to automate receipt processing however FSA has numerous systems and full integration with compatible systems will take time. FSA is considering the integration of all systems however the integration One-span would involve connecting two different system types and the added complexity of this integration may make it less practicable for immediate prioritization.

Resolution:

NASCOE accepts this response.

ITEM 10:

Issue:

County Offices recently participated in the pilot scanning project and found it the process to be a bit chaotic. They didn't feel as though their feedback was taken to heart throughout the process, and the project doesn't seem to accomplish the agency goals.

Offices are now being told that they must be ready to scan files after December 31st and there are concerns that haven't been addressed. One of the reasons employees are hesitant at the idea of scanning our files now is that we don't know anything about the final software that will be used to store our files.

We also have complex and varied filing systems – the File Disposition and Maintenance guide and National Handbook 32-AS aren't providing the structure new employees need to understand how and where to file documents to make for ease of finding them at a later date.

Position:

NASCOE would like to see early access given to all employees that will be required to use this software, and some better guidance on the process. This will be a massive undertaking in most offices and will be time consuming without the added headache of not knowing the true end goal.

We would also like to see a centralized place where employees can submit questions and get feedback before the process begins to help it go smoothly. It would alleviate headaches if employees knew their concerns were being addressed prior to deadlines being in place.

Finally, addressing the missing forms currently not addressed in the 32-AS handbook or the File Disposal and Maintenance guide would be a big help. This seems to be a common struggle among all employees.

FSA Response:

The records scanning pilot was in conjunction with the continued work on DRMS (Digital Records Management System) as a whole. To date, no deadline has not been announced to do any sort of file scanning outside of the select offices that participated in the pilot. A series of amendments is currently in the works for 32-AS and the National Office is working with the Records Management team on finalizing records management tools.

Resolution:

NASCOE accepts this response.

ITEM 11:

Issue:

As we move towards electronic filing systems and use of digital/electronic signatures we now need policy on how COC, or CED as delegated, can approve these documents in a way that is easy and streamlined for County Office employees. When a document is sent for signature using OneSpan (through the Box environment), a signing order can be established for every producer that needs to sign and then for the “approval official”. Training provided on OneSpan/Box have indicated that employees should be setting the signing order up and suggest that the CED should be signing these applications in the OneSpan environment. However, the signing of these documents in OneSpan for approval purposes for the COC and/or CED is not secure and there is no way to show that the signature was authenticated.

If the COC, or CED as delegated, chooses to sign the document manually then the file needs to be printed, signed, and if needing to be filed electronically, the document needs to be scanned and re-saved. If the file needs to be signed by the CED using Adobe, to show the USDA watermark and proper authentication of the approving official, then the OneSpan document must first be “printed” using the Microsoft Print to PDF option, saved, then signed using the certificate in Adobe. These extra steps all reduce efficiencies in the county office. Currently, no policy exists for approval of electronic/digital applications and files in 1-CM. The policy that is in paragraph 679 of 1-CM (Rev 3) is only policy for Facsimile Signatures for COCs and CEDs.

Position:

Currently, subparagraph 676D of 1-CM (Rev. 3) only covers accepting digital signatures from a producer. NASCOE requests that policy be issued in handbook 1-CM (Rev. 3) which clearly shows the allowable approval/signing methods for COC, or CED/approving official, when it comes to electronic or digital applications. If OneSpan software is the suggested method to use when it comes to approving documents, NASCOE would like to suggest that the USDA watermark and proper authentication of the approving official be added to protect the integrity of the agency.

FSA Response:

Notice CM-854 was released on August 23, 2023, providing further guidance to the field. SND is working to incorporate that guidance permanently into the next revision of 1-CM.

Resolution:

NASCOE accepts this response.

ITEM 12:

Issue:

The acreage reporting deadline for cover crops is July 15; however, many of our cover crops are small grain crops that are fall seeded and have a deadline to report those acres by an earlier date depending on the state the producer farms in. RMA cover crop provisions require

that the producer report their cover crop by March 15th and offices have diligently worked to assist producers with the timely reporting of their cover crop on FSA-578(s).

When reporting a Cover Crop, we are to use the Cover Crop code per Exhibit 10 of 2-CP and this code then does not “count” towards planted acreage on the FSA-578. The Cover Crop code allows a producer to come back after termination and report a subsequently planted crop for the crop year. We have found that many producers plant cover crops with the intended use of terminating them according to the cover crop termination guidelines. However, in certain cases, depending on the stand/price/weather conditions and such, the producer will choose to carry that crop to harvest for grain or other uses. Other times, the producer will let that crop remain on the land for the year without termination and it will be left standing.

According to 2-CP Par. 32 E Amendment 18; in the situation above, the producer is now required to pay minimum of \$46 late file fee to change the crop from Cover Crop to the actual Crop of Rye (or other crop as applicable) as grain or left stand and the COF is having to conduct a field visit to verify the acres. Even if the producer had reported the crop as a cover crop, which was the intention at the time of planting. There is still a fee/field visit assessed to revise the cover crop to the now intended actual CROP for grain, forage, graze, or left stand. COFs do not have resources to conduct these visits and producers are not happy with having to pay the late file fee when they initially filed a report indicating that they had planted the crop as a cover crop; however, without that payment and field visit a producer will not have a fully certified farm which has a negative impact on many FSA programs.

Position:

Prior to 2-CP, Amendment 18, a producer was required to revise the cover crop that was not terminated according to the guidelines, but no late file provisions were applied. It is understood that this was likely used by some producers to get around the late file provisions of a fall seeded crop. However, this change in policy has created extra workload in most situations and is penalizing the producer unnecessarily.

NASCOE proposes that the certification deadline for fall seeded cover crops be changed to reflect that of all other fall seeded crops. NASCOE further propose that a deadline of March 15 to report that these cover crops will not be terminated be implemented to coincide with program requirements. We understand that not all cover crops have to be terminated by that date, but also realize most producers will have decided by that point in time. This deadline would mean no late file fees need to be paid by the producer for changing the cover crop to a harvestable crop if the crop is not NAP insurable. This would reduce the number of late file fees and field visits and allow the producers flexibility with their cover crops, while still holding them to reasonable reporting standards.

FSA Response:

The acreage reporting taskforce met the week of August 7. After further conversations and it was determined that the cover crop policy is currently working as intended and FSA needs to

stay in alignment with the other FPAC agencies in the prior agreed to policy around cover crops.

Resolution:

DAFP will take this item back to review the policy and procedures associated with this to ensure that all pros/cons are researched.

ITEM 13:

Issue:

New OTIS software updates were released recently. The field was notified of the updates via an e-mail from Lindsay Mutegi on November 16, 2022. National FSA Handbook 22-AO was not released with the software/procedure changes which were announced.

Position:

Handbook amendments should be used to notify field offices of changes which affect procedure or display references in handbooks. National FSA Handbook, 1-AS, affirms valid directives for the field include the following: handbooks, amendments, and notices.

Handbook 22-AO procedure and display references should be updated.

FSA Response:

The Office of Outreach is in the process of doing a mass rewrite of 22-AO and they hope to have something completed in FY 24.

Resolution:

NASCOE accepts this response.

ITEM 14:

Issue:

It has been reported that using the OneSpan application to get digital in-person signatures on the ERP 2 application is a laborious and frustrating process. The OneSpan application's implementation to obtain a digital In-Person signature on the ERP 2 application has significantly slowed the process when servicing the producers, which is one of the biggest concerns.

When a producer arrives at the office prepared to sign their ERP 2 application, for instance, the County Office Employee opens the ERP 2 application beginning with the following steps:

- FSA Applications
- ERP-2 Emergency Relief Program Phase 2 Application
- Producers Name
- Saves to your computer
- Return to the FSA Applications

- Select OneSpan Dashboard
- Select New Transaction
- Enter Transaction Name
- Select In-Person Signing
- Select Create
- Select Add Document
- Search/Select your Save Select Signature under "Fields" and then click "Send to Sign." A soft message will pop up asking if you still want to send this transaction for signing while notifying all recipients via email.
- Choose Send when a second soft-message window asking whether you want to begin signing appears.
- Choose Yes
- Choose the Recipient

This process of obtaining a signature on an application is time-consuming, ongoing, and not efficient for the county office staff considering the heavy workload.

Position:

NASCOE would like management to pursue a process on integrating digital signatures within the software applications. With the use of digital technology being recommended as a part of our workflow, integrating digital signatures within the software applications will cut costs by cutting out a third party.

FSA Response:

NASCOE is correct. We agree that the OneSpan process is not efficient for employees. Recent instructions have been provided regarding the use of templates and layouts to reduce some of the employee's burden. Here is the link to the myFPAC Box and OneSpan page:
<https://intranet.usda.gov/box-and-onespanhttps://intranet.usda.gov/box-and-onespan>

Here is our new FSA Special Projects SharePoint site with our weekly office hours training recordings, ppt, and Q&A's: [FPAC-FSA-SpecialProjects](#)

Due to the Administrator's requirement and deadline to make the e-signature process available and go paperless, OneSpan was selected as an interim solution. Automation of the manual steps taken by the employee and streamlining of the e-sign process was added to the PDD project list. This project will be developed in phases as funding allows.

Resolution:

NASCOE accepts this response.

ITEM 15:

Issue:

There seems to be some inconsistency with which programs are counted in the workload calculations. Many of our ad hoc and our disaster programs are not regularly counted in the workload. It seems that disaster programs from being something that we dealt with on occasion to a regular occurrence. We also would like to see portions of our regular programs that aren't currently used in the calculation be incorporated into the workload model.

Position:

NASCOE would like to see an updated staffing model that continually includes all disaster programs and all areas within those programs. For example, NAP only accounts for the number of applications for coverage and the number of applications for payment. It does not account for the number of APH's that are required to be completed yearly, regardless of whether an application for payment is needed that given year.

Also, the metrics only account for the number of applications that are attributed to the administrative office, and not the number of applications that an office may complete for another county. With nationwide customer service, many offices complete a greater workload than accounted for by their own individual numbers at the request of their producers.

FSA Response:

The staffing model does include all disaster and ad-hoc programs. Further although the staffing model does not directly count APH completed it does account for their completion by utilizing a designated relative metric which functions as a relative proxy for all workload completed for the program.

In NAP the time associated with the workload program "NAP Signup & Service" is all leveraged against the metric "applications for coverage." The time per metric includes all the time spent completing signup and servicing metrics including applications for coverage, APH, maintaining units, etc., but then uses the application for coverage as a relative value between all the states within the applicable region. This time per metric then provides an equitable baseline to apply to forecasted metrics to ensure all offices receive equal credit relative to the baseline relative metric. Utilizing APH in addition to applications for coverage was evaluated by the BAMSD working group however the metric had a weak correlation against time spent on the program and further had issues with data integrity due to inconsistency with zero credited APH and APH required but not completed and therefore was rejected as an official metric.

Lastly, for workload purposes we always want to capture workload at the administrative office for the record regardless of who produces the metric. This is intentional as we want to ensure that a staffing recommendation is based on the records an office is responsible for. If we instead looked at the offices that completed the widgets it would result in perpetuating staffing inequity because an office that needed extra help due to lack of staffing that received

assistance from another office would not show the low relative staff compared to their widgets which is what would target them for staff increases.

Resolution:

NASCOE accepts this response.

ITEM 16:

Issue:

Many county offices are in rural areas that have limited access to Emergency Medical Services in the event of a catastrophic emergency. Additionally, not all county offices are provided Automatic External Defibrillators (AEDs) and training for emergency situations. People being trained in how to use and implement this life saving equipment has changed the outcome of cardiac arrest events.

Position:

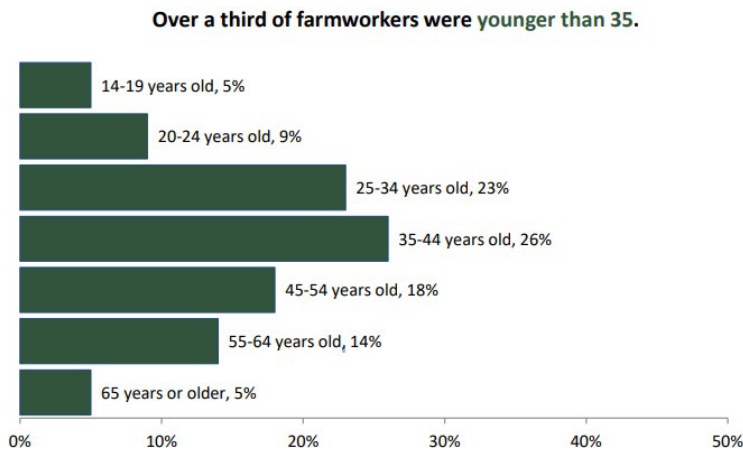
NASCOE believes that providing lifesaving equipment, such as an AED, in every USDA service center and providing training on using the machines and CPR techniques would be invaluable for the health and safety of not only the producers but also the employees. FSA has been providing training on employee safety for many years now, but CPR, AED machine use, and other basic aid has eluded those trainings.

Age is one of the several factors that play a role in the risk of cardiac arrests. The National Agricultural Workers Survey reported that in 2019-2020 the average age of the U.S. crop labor force was 41 and the two age groups of 45-54 and 55-64 made up about one-third of the workforce.

Gender and Age

In 2019–2020, the U.S. crop labor force was predominantly male (66%) and had an average age of 41 and median age of 39. Just more than one-third of farmworkers were under the age of 35 (37%), and 19 percent were age 55 or older (Figure 2.1).

Figure 2.1: Age Distribution of Farmworkers, 2019–2020



Furthermore, the National Agricultural Statistics Service survey from 2017 shows that the number of all producers that are between the ages 45-54 was 614,654 and the number for

ages 55-64 is 955,354. Another factor for increased risk is stress levels and FSA already understands the heavy amounts of stress load our farmers endure, because every year we are trained on helping farmers through their stress.

NASCOE is requesting training on the use of AED machines, including a demonstration on the correct use of the equipment. The website for the AED machine explains that formal training is not required, and the machines were designed so that anybody could use them properly. However, some people may have never known what the machines are, when they've seen them in public, and they may feel uncomfortable attempting to use one for the first time. Whereas, if they had an opportunity to see a demonstration, then it wouldn't feel new to them.

Another critical aspect of this request is maintaining the machines with yearly inspections and annual refresher courses for employees.

NASCOE is requesting that FSA Management, either independently or in coordination with FPAC, develop a plan and initiative to place one AED in each USDA Service Center.

FSA Response:

DAFO is currently engaged with the FPAC mission area conducting a feasibility study on supplying AEDs to all FPAC Service Centers.

Resolution:

DAFO has reached out to the FPAC-BC Health and Safety Officer to find a way to work with the sister agencies to have working AED Machines at every service center across the nation. There has been a request put forward with leadership requesting the budget for the equipment costs. If the FPAC-BC can't make this request feasible, DAFO will work to begin implementing this request. Also, there is training under the GSA contract for individuals to complete whether in person or virtually and DAFO will work on adding those link to the DAFO training SharePoint site.