



October 9, 2023

Dr. Dewayne L. Goldman
USDA Senior Advisor for Racial Equity
Office of the Secretary, Department of Agriculture
1400 Independence Avenue SW, Room 6006-S
Washington, DC 20250
EquityCommission@usda.gov

Re: Public Comments for October 24-26 Equity Commission Meeting

Dear Equity Commission Members:

Having reviewed the United States Department of Agriculture's (USDA) [Equity Commission 2023 Interim Report](#), I see that the following four items will need to be the focus points for Equity Audits:

1. Outreach: What new and sustainable methods will be used to measure the outreach?
2. HBCU underfunding: What steps will be taken to address the shortfall and prevent future recurrences?
3. Small business development: Will business plans for small and urban farming include specifics for specialty crops and crops that are being imported into the United States?
4. Checkoff programs: How will the USDA ensure there is a return on investment for Socially Disadvantaged farmers?

The lack of sustainable outreach is an issue that has plagued underserved farmers and producers for a long time and created the widespread inequality that the Equity Commission was founded to address.

The study by the USDA and Department of Education (DOE) is a step in the right direction, but the study by itself will not provide the necessary money to right the wrongs of underfunding. The USDA must not allow this inequality to continue. Here are [the letters](#) sent to sixteen governors regarding the issue of 1890 underfunding.

The Small Business Administration and USDA Rural Development need to work together to create a mentor program for farmers modeled after the Service Corp of Retired Executives.

We need to ensure that mandatory fees collected from farmers through agricultural checkoff programs are being used equitably. Checkoff programs are essentially a tax, and must be held accountable for equity and inclusion.

Thank you,

Webster Davis
Senior Policy Advisor
Farm Action