



New York Farm Bureau • 159 Wolf Road P.O. Box 5330 • Albany, New York 12205 • (518) 436-8495 Fax: (518) 431-5656

August 7, 2014

NYS Higher Education Services Corporation
99 Washington Avenue, Room 1325
Albany, NY 12255

Dear NYS Higher Education Services,

New York Farm Bureau, the State's largest general farm organization, appreciates the opportunity to comment on the New York State Young Farmers Loan Forgiveness Incentive Program.

The agriculture industry has a substantial impact on New York's overall economic health, contributing approximately \$8 billion in overall return to the state's economy. Currently, the average age of farmers in New York is 57 and is expected to increase unless steps are taken to encourage beginning farmers to join the agriculture industry. Farming is a difficult business and there are many barriers to younger farmers who might consider entering the profession. In fact, less than 1000 students were awarded degrees in agriculture by a college in New York State. The New York State Young Farmers Loan Forgiveness Incentive Program would bolster young farmers by providing a student loan forgiveness program for recently graduated farmers.

In the proposed rule, it states: "*Degree shall mean an undergraduate degree.*" New York Farm Bureau recommends that this should be interpreted to include applicants who obtained either 2-year or 4-year degrees (Associates or Bachelor's degrees), with no preference given for length of study.

Under the definitions section, it states: "*Approved New York state college or university*" shall mean a college or university located within New York State that is accredited by an agency recognized by the United State Secretary of Education, or by a successor federal agency." New York Farm Bureau believes that young farmers who chose to study at accredited colleges or universities outside of New York State should also be eligible to receive the Award as well as applicants who received their degrees through accredited online programs. Some young farmers decide to attend schools outside of New York State for a whole array of reasons, and we believe that they should not be penalized for that, especially if they plan on returning to New York to farm. Also by widening the applicant pool to those who received their degrees in other states, it may encourage for young farmers to return or come to New York to establish or take over a business. Applicants who did receive their degrees from an approved New York State college or university could have higher consideration to receive the Award.

The proposed rule states: *For the first year of this program's operation, awards shall be granted to applicants who are economically disadvantaged with a priority given to those applicants completing the second, third, fourth or fifth years of full time farm operation.* New York Farm Bureau would like to inquire if there is a timeframe after graduation that applicants would be able to receive the Award? New York Farm Bureau recommends that applicants be eligible to apply for the Award at least 10 years after their graduation date. This timeframe enables young farmers the opportunity to learn at other jobs and then join an existing agricultural operation or start their own agricultural business. Many times, recent graduates will go to another farming operation or take a job off the farm, which gives them the time to decide if they would like to return to a family operation or start their own business.

The proposed rule states “*operate or operation shall mean employment in a managerial position.*” New York Farm Bureau believes award consideration should also be given to young farmers who are not in a managerial position. Many young farmers start out on a farm as general employee and make their way up to a managerial position. But this can take years as management ages or as the business transitions to the younger generation. These young farmers will eventually be in an operator position, but need financial assistance now.

The proposed rule states: “*(iii) confirm annually his or her operation of a farm in New York State on a full time basis by submitting a certification from his or her employer attesting to the recipient's job title, job duties, full-time employment status (including a copy of the employer's policy, practice, and standard for defining full time employment), and any other information necessary for the corporation to determine eligibility.*” An applicant may be the sole-proprietor of his/her business and may not have an employer with which to verify their employment status. New York Farm Bureau believes applicants should not be detrimentally impacted if they are the sole-operator of their business and that other means of verifying their operation of a farm, including the submittal of a schedule F, would serve to prove that the applicant is an operator of an agricultural operation. However, a sole-proprietor would still be required to submit all related job information to the corporation.

The U.S. Secretary of Agriculture has set a goal of recruiting 100,000 new farmers across the country to replace those who are retiring. By enacting a loan forgiveness program for young farmers, New York can take one small step at helping that recruitment effort.

New York Farm Bureau is pleased to submit these comments and to have the opportunity to share our thoughts and suggestions.

Sincerely,

A handwritten signature in cursive script that reads "Lauren Williams".

Assistant Director of Public Policy
New York Farm Bureau