



United States Department of Agriculture

Farm and Foreign Agricultural Services  
Risk Management Agency

**BULLETIN NO.: MGR-99-028**

TO: All Reinsured Companies  
All RMA Field Offices  
All Other Interested Parties

FROM: Ken Ackerman /s/ Ken Ackerman 8-10-99  
Administrator

Rosalind Gray /s/ Rosalind Gray 8-11-99  
USDA Civil Rights Director

SUBJECT: Civil Rights Commitment

**BACKGROUND:**

The Department of Agriculture has been made aware that questions may exist regarding its current plan with respect to complying with data collection requirements of Title VI of the Civil Rights Act of 1964 and related statutes. The purpose of this bulletin is to reiterate USDA's approach to this issue.

**ACTION:**

USDA, in the exercise of its Standard Reinsurance Agreement, has consulted with the crop insurance industry several times over the past several months concerning the collection of this data under the SRA. USDA is currently clearing a regulation for the collection of demographic data on participants in the Federal crop insurance program in order to satisfy Federal legal requirements and to improve service to all segments of the American farm community. In the clearance process, we are determining whether it is feasible to publish the rule for notice and comment under the Administrative Procedures Act. Actual implementation of the data collection process would begin for crops at the earliest practicable time in the insurance year.



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The Risk Management Agency Administers and Oversees  
All Programs Authorized Under the Federal Crop Insurance Corporation

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Separately, the Risk Management Agency (RMA) has been researching an alternative, less-burdensome method of collection demographic data through the Social Security Administration (SSA). If successful, RMA would not need to pursue a regulation. The outcome of this effort is unclear, however, because the SSA data may not contain sufficient detail for USDA's civil rights needs. RMA is also exploring data that the Census Bureau, the National Agricultural Statistics Service (NASS), and the IRS may have, though it is not clear that data from those agencies will be sufficient either. RMA will continue its research in these areas. Because no satisfactory alternative approach has yet been found, and because it is essential that meaningful demographic data be collected as soon as practicable for USDA to satisfy its civil rights requirements with respect to the Federal crop insurance program, USDA is moving forward to obtain proper clearance on the data collection regulation in a timely manner.

Should you have any questions, RMA hopes our partners will call us for clarification. RMA will proceed to work with OMB in clearing the regulation. We appreciate the commitment that many in the crop insurance industry have expressed to the need for equal and fair treatment of all customers in the Federal crop insurance program, and look forward to your continued cooperation in this effort.