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Procedural Operations of the Farmers Home Administration, Department of Agriculture, in Wisconsin. B-114873. February 10, 1977. Released June 16, 1977. 8 pp. + 8 appendices.

Report to Sen. William Proxmire; Sen. Gaylord Nelson; Rep. Alvin J. Baldus; Rep. Les Aspin; Rep. Robert J. Cornell; Rep. Robert W. Kastenmeier; Rep. David R. Obey; Rep. Henry S. Reuss; Rep. Clement J. Zablocki; by Elmer B. Staats, Comptroller General.

Issue Area: Domestic Housing and Community Development: Economic Development in Rural Areas (2103).

Contact: Community and Economic Development Div.

Budget Function: Community and Regional Development: Area and Regional Development (452).

Organization Concerned: Farmers Home Administration.

Congressional Relevance: Sen. William Proxmire; Sen. Gaylord Nelson; Rep. Alvin J. Baldus; Rep. Les Aspin; Rep. Robert J. Cornell; Rep. Robert W. Kastenmeier; Rep. David R. Obey; Rep. Henry S. Reuss; Rep. Clement J. Zablocki.

Authority: Rural Development Act of 1972.

An investigation was requested by members of the Wisconsin congressional delegation to evaluate procedural operation of the Farmers Home Administration, Department of Agriculture, in the state of Wisconsin. The areas of concern were (1) shuffling of personnel between county offices, (2) adequacy of supervisory training, (3) establishment of one-stop service centers, and (4) delays in processing loans in county offices. Findings/Conclusions: An analysis of the 67 transfers of personnel between county offices showed that 31 involved promotions, 19 were lateral reassignments at agency discretion, and 17 were lateral reassignments at the employee's request. It was noted that some employee objections to involuntary lateral transfers were diminished by subsequent promotions. Administration employees apparently received sufficient information to effectively perform their jobs. Some county and assistant county supervisors expressed a need for additional and more relevant training. The 10-year-old training manual currently in use does not cover administration of emergency loan programs. Of the 25 one-stop service centers that have been approved, seven have been opened and two have been withdrawn from designation as of July 1976. Widespread misconceptions exist in Wisconsin about the purpose of the one-stop service centers. So the average processing time in 1976 for emergency loans and rural housing loans was 4-6 months.

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*REPORT OF THE
COMPTROLLER GENERAL
OF THE UNITED STATES*



00006

Procedural Operations Of The
Farmers Home Administration,
Department Of Agriculture,
In Wisconsin

This report contains summary data on

- shuffling of personnel between county offices,
- adequacy of supervisory training,
- establishment of one-stop service centers, and
- delays in processing loans in county offices.



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114873

The Honorable William Proxmire, United States Senate
The Honorable Gaylord Nelson, United States Senate
The Honorable Alvin J. Baldus, House of Representatives
The Honorable Les Aspin, House of Representatives
The Honorable Robert J. Cornell, House of Representatives
The Honorable Robert W. Kastenmeier, House of Representatives
The Honorable David R. Obey, House of Representatives
The Honorable Henry S. Reuss, House of Representatives
The Honorable Clement J. Zablocki, House of Representatives

On July 1, 1976, you, along with other members of the Wisconsin congressional delegation, requested an investigation into certain procedural operations of the Farmers Home Administration, Department of Agriculture, in the State of Wisconsin. The areas of concern outlined were (1) shuffling of personnel between county offices, (2) adequacy of supervisory training, (3) establishment of one-stop service centers, and (4) delays in processing loans in county offices.

We met with the offices of the Wisconsin delegation and the office of Governor Patrick J. Lucey on July 15, 1976, to reach agreement on the work to be done in each area of concern. We were told that your offices wanted the results of our investigation by September 30, 1976. Accordingly, it was agreed that we would limit our work to obtaining certain information and to giving an oral briefing by that date. Appendix 1 to this letter contains the specific agreements reached on the work to be done. In addition, we were asked to analyze a pending Department of Agriculture report of the investigation of the Farmers Home Administration which the Wisconsin delegation had requested in 1975.

During the July 15, 1976, meeting, we advised your offices of the completion of a comprehensive financial management study of the Administration by the Joint Financial Management Improvement Program. Because the program affects Administration loan processing operations, we arranged for a briefing of the Wisconsin delegation by the staff of Joint Financial Management Improvement Program on August 3, 1976. At that meeting, the benefits and potential

for improvement in the Administration's financial management system were described. As a result, it was agreed that our review work on loan processing delays could be reduced to determining whether the program has had any noticeable effects on county office operations.

The Department of Agriculture investigation report was not ready for our review when we completed our field work; therefore, to avoid further delay, we briefed your offices on the results of our investigation on September 24, 1976. As agreed, this letter summarizes the briefing given your offices. We subsequently met with your offices on October 12, 1976, to brief them on our analysis of the Department of Agriculture's investigation report.

BACKGROUND

The Farmers Home Administration consists of a headquarters office in Washington, D.C.; a national finance office in St. Louis, Missouri; and a field structure of State, district, and county offices.

Agency headquarters, headed by the Administrator, establishes general agency policies, allocates personnel positions among the States, and provides guidance to the field offices. The national finance office develops and executes the agency's financial and program accounting and reporting requirements.

The State office in Wisconsin, located in Stevens Point, is headed by the State Director who is responsible for administering all agency programs and activities throughout the State and for supervising county operations. During fiscal year 1975, there were 45 Farmers Home Administration county offices and 157 full-time employees in Wisconsin.

The Agriculture one-stop service center program emanated from provisions contained in the Rural Development Act of 1972. The act requires that (1) first priority must be given to the location of new offices and other facilities in rural areas, (2) the collocation of agricultural field units, whether Department of Agriculture

or non-Department of Agriculture, covering the same or similar geographical areas, and (3) the interchange of personnel and facilities in each such office to the extent necessary or desirable to achieve the most efficient utilization of such personnel and facilities.

The work requested by your offices was performed at the Wisconsin State offices of several Agriculture agencies, five Farmers Home county offices including two one-stop service centers; and included interviews of Federal, State, and county officials; and examination of 65 Agriculture investigation and audit reports covering Farmers Home operations in Wisconsin. The full scope of our review is described in appendix II.

PERSONNEL SHUFFLING

For the period January 1974 through July 1976, State Administration office records showed there were 67 transfers of personnel between county offices. The breakdown showed that 31 transfers involved promotions, 19 were lateral reassignments at agency discretion, and 17 were lateral reassignments at the employee's request. In addition, there were 36 resignations, 10 retirements, 2 deaths, and 6 separations and terminations.

Certain Administration employees are members of the American Federation of Government Employees Union Local 3255. The Union was established to represent the interests of union employees with respect to grievances, personnel policies, practices and procedures, or other matters affecting their general working conditions.

We interviewed five assistant and county supervisors and one District Director involved in eight of the above transfers. These transfers involved four promotions and four lateral reassignments. We also interviewed three former Administration employees and reviewed the Office of Investigation and Administration files on 10 former State and county office employees.

We noted that some employee objections to involuntary lateral transfers were diminished by subsequent promotions. Some present and former employees felt that

union membership was more of an impediment to advancement than opposition to transfers. Office of Investigation files on former employees who resigned or whose jobs were terminated because of involuntary transfers, indicated that the personnel actions were warranted by workload requirements. According to Administration employees, the inability of Farmers Home to serve the public needs and personal criticism by borrowers prompted others to resign. According to one employee interviewed, and confirmed by others, transfers of three employees from one county office were the result of personality conflicts with a fellow employee.

The Administration's instructions and the Labor Management Agreement provide that mobility is understood as a condition of employment in county offices. The State Director is authorized to transfer employees in connection with a promotion. However, in September 1975 the State Director was issued a letter of caution by the Administration's Office of Personnel Director because of the State Director's policy of not promoting assistant county supervisors to county supervisor vacancies in the offices where they had been assigned as assistants. Our investigation disclosed no indication that this policy had been rescinded.

Concerning your question as to whether Administration employees had been provided the necessary information to effectively perform their jobs, our interviews with 23 Administration employees showed that the lack of or access to information was not a problem.

TRAINING REGULATIONS

Since 1974, 47 of 53 county supervisors have received at least 40 or all 80 of the required hours of supervisory development training at the Administration's Norman, Oklahoma, training facility. (See app. III.) The remaining and new supervisors were scheduled to take the required training in the near future.

Some county and assistant county supervisors expressed a need for additional training, including appraisals of real property, especially for the assistant county supervisors who have not had the benefit of the formal appraisal training at Norman. Some stated the appraisal training at Norman did not always meet their needs to handle the

different conditions encountered in Wisconsin. Furthermore, we noted that the training manual was issued in November 1967--before the existence of emergency loan programs currently being administered in the county offices.

ONE-STOP SERVICE CENTERS

The Agriculture one-stop service center program emanated from provisions contained in the Rural Development Act of 1972. The State Administrative Committee, comprising the heads of the agricultural agencies in each State, is responsible for preparation of plans for locations of the service centers. The Department of Agriculture provided general guidelines for the State Administrative Committees to develop plans for the location selection process in accordance with certain priorities. (See app. IV.) On June 18, 1975, the Wisconsin State Administrative Committee agreed on the county locations in accordance with these priorities. (See app. V.) According to an Agriculture official, the locations designated for one-stop service centers must be approved by the heads of Agriculture Department agencies participating and were to be made known to the U.S. Senator and Representative of the districts affected. The State Administrative Committee designated locations were also submitted to the Chairmen of the Senate and House Subcommittees on Agriculture and Related Agencies of the Committees on Appropriations.

Department of Agriculture guidelines set the upper limit of locations proposed for service centers to the number of locations of the agency with the largest number of offices in the State as of November 1973. In Wisconsin, the State Administrative Committee decided that the largest number of service centers could be as many as 64. The actual number of locations will depend on the selection and approval process. Acceptance of the service center concept by the public remains questionable and may influence the final selections.

Of the 26 locations designated by the Wisconsin State Administrative Committee, 25 have been approved, 7 have been opened, and 2 have been withdrawn from designation as of July 1976. Of the initial designation, agencies at 13 locations were already housed in the same building but required some moving so that some of the agencies' offices could be physically located together. For the most part, this involved moving agencies located on different floors of a building to the same floor. Of the 11 remaining designations, at least 1 agency will be required to move.

At the two service centers we visited, the moves involved distances from across the street to a few blocks. Since only seven centers are operational, the disruptions of agricultural program services and movement of personnel have been minimal.

Nevertheless, our investigations in Wisconsin revealed that widespread misconceptions exist about one-stop service centers. One of the most widely held views was that the purpose of the centers was to curtail agricultural services which would be accomplished by limiting the number of center locations in the State. Some believed counties not designated for service centers would eventually lose the agriculture agencies presently located there. These misconceptions were apparent in newspaper clippings and correspondence and from Federal, State, and county officials interviewed throughout Wisconsin.

LOAN PROCESSING

For the five county offices visited, the applications, number processed, and average processing days for the past 2 fiscal years are shown in the following table.

<u>County and town</u>	<u>Emergency Loans</u>			<u>Rural Housing Loans</u>		
	<u>Applica- tions</u>	<u>Number of loans</u>	<u>Average number of days to process</u>	<u>Applica- tions</u>	<u>Number of loans</u>	<u>Average number of days to process</u>
Fiscal Year 1975.....		Fiscal Year 1976.....		
Barron (Barron)	336	318	72	96	37	176
Crawford (Prairie du Chien)	36	29	74	2	-	-
Wood-Portage (Wisconsin Rapids)	245	208	94	8	2	167
Waupaca (Waupaca)	76	56	153	15	2	137
Juneau-Adams (Mauston)	181	90	118	19	3	119
Barron	122	15	188	104	11	183
Crawford	48	22	137	58	17	120
Wood-Portage	178	27	156	99	6	137
Waupaca	103	33	162	72	7	282
Juneau-Adams	127	36	147	76	22	143

Emergency loan data for fiscal years 1975 and 1976 is not comparable because the requirements for these loans became more stringent on July 9, 1975. Since July 1975 these loans require the same processing steps (see app. VI.) as the regular farm operating loans. The only advantage of an emergency loan is that the borrower incurs a lower interest rate for up to the amount of his established loss.

According to an Administration official, loan processing times have been reduced at county offices as a result of Administration financial management program changes and that further improvements can be anticipated as changes are made at the State and national offices. For rural housing loans made between fiscal years 1975 and 1976, we noted the average processing time declined somewhat in most Administration county offices visited, whereas the national finance office ADP reports showed the total number of loans obligated increased from 126 to 170.

We encountered a wide variety of complaints and reasons for the length of time it took to process loans in Administration county offices. According to State and local officials, the understaffing of county offices coupled with a succession of natural disasters have compounded the problems with processing Administration loans in Wisconsin. The situation is not improving, since the Administration expected up to 65 of the 72 Wisconsin counties to be designated disaster areas by December 31, 1976. Moreover, according to the Chief, for State programs, the three emergency loan programs in effect since April 1973 have become progressively more complicated to administer.

According to State and local officials, the greater workload in county offices for 32 Farmers Home programs had diminished the personal contact with borrowers. County supervisors no longer have time to periodically review the progress of each borrower or to advise and counsel. This situation particularly affects those borrowers who have reached the limits of their credit with the Administration because of the succession of disasters in the State. Consequently, the inability to provide the needed assistance has caused the county offices to become more selective in approving loan applications.

In addition to workload problems, the lack of continuity in county office staffs was the next most frequent criticism mentioned in interviews and correspondence files as the cause for delays in loan processing in county offices. Frequent absences of Administration staff members for meetings, training, and other reasons were mentioned as delaying processing loans. Some real estate salesmen regularly avoided dealing with the Farmers Home Administration because of the lengthy procedures involved.

Conversely, borrowers contributed to the loan processing delays by failing to provide Administration offices with the required documents, to keep appointments, and to notify the Administration of changes in decisions to buy, etc. Some county supervisors noted that individuals wrote complaints about the Administration to their Congressmen before they filed a loan application at the county office. According to the Office of Investigation, borrowers they interviewed were no longer interested in voicing complaints about the Administration after they had obtained loans.

Concerning your question as to the shifting of personnel to assist in heavy workload situations, employment of part-time personnel and assistance by Agricultural Stabilization and Conservation Service county office staffs was the usual means used to supplement Farmers Home Administration county office staffs in Wisconsin. Limited travel funds was one of the reasons offered by Farmers Home for this decision. Also personnel limitations coupled with an expanded workload caused by the succession of disasters in Wisconsin during the 2-year period created the backlog of loan applications.


Comptroller General
of the United States

AGREEMENTS REACHED DURINGJULY 15, 1976, MEETING

1. Concerning the shuffling of personnel, GAO agreed to review two Department of Agriculture audit reports, interview certain Farmers Home Administration employees (names provided), and investigate into whether the Wisconsin State Director provided sufficient information to Farmers Home employees on the emergency loan program.
2. Concerning the training regulations, GAO agreed to provide an updated listing of a 1974 Civil Service report showing which Farmers Home employees received supervisory development training.
3. Regarding one-stop service centers, GAO was provided with the names of several individuals who we agreed to interview. It was further agreed that GAO would provide information on the concept on the one-stop service center program and its status within the State of Wisconsin. GAO also agreed to determine if Farmers Home or the Department of Agriculture issued any instructions to Senators and Congressmen advising them of a contact point within the Department should they wish to object to establishing a one-stop service center within their State or district.
4. Regarding delays in loan processing, GAO agreed to obtain statistics on the rural housing loan program and the emergency loan program. GAO further agreed, through interviews and review of Department of Agriculture Investigation and Audit reports, to aid in identifying problems connected with the length of time involved in processing rural housing and emergency loans.

SCOPE OF GAO WORK

1. We visited the Department of Agriculture's Office of Investigation Regional Office in Chicago and reviewed 15 report files of investigations in Wisconsin requested by Members of Congress and Agriculture officials. We also obtained and reviewed over 50 Office of Audit reports on Administration operations in the State of Wisconsin.
2. We visited the State Farmers Home Administration, Agricultural Stabilization and Conservation Service, and Soil Conservation Service offices; discussed the establishment of the one-stop service centers in Wisconsin with the members of the State Administrative Committee; and obtained the committee meeting minutes.
3. We visited five Wisconsin Administration offices for the counties of Crawford, Barron, Wood, Portage, Waupaca, Juneau, and Adams to review pertinent records of loan programs and office operations. Barron in Barron County and Mauston in Juneau County are the locations of the one-stop service centers visited.
4. We interviewed 65 State and local officials of agencies, businesses, and organizations, including 23 Administration employees, to obtain information and comments about Administration operations in Wisconsin.
5. We visited the State Administration office to review complaint files, personnel actions, disaster and rural housing programs and obtained information on training activities.

Whenever possible, we avoided duplicating the work performed by Department of Agriculture Offices of Audit and Investigation personnel, particularly with respect to contacting individual Administration borrowers with complaints.

SUPERVISORY DEVELOPMENT--PHASE 1 AND 2

	<u>Phase 1</u> (40 hours)	<u>Phase 2</u> (40 hours)
Bob Ruef	April 1973	March 1973
Dell Whelan (note a)		April 1973
Duane Catt		May 1973
Bob Gregurich	April 1973	July 1973
Ron Wessels	March 1973	July 1974
Mark Hæser	March 1973	August 1974
Nick Salm	November 1973	December 1973
Clive Edinger	December 1973	August 1974
Dick Wagner	February 1974	July 1974
Ken Freitag	February 1974	July 1974
Ken Frost	February 1974	August 1974
Owen Demo	July 1974	August 1974
Grant Larson	July 1974	August 1974
Bob Larson	August 1974	August 1974
Don Brue	Civil Service Commission and August 1974	July 1975
Chet Ligons	July 1974	December 1974
Lloyd Hoberg	August 1974	December 1974
Dan Johnson	August 1974	August 1975
Grayson Zuhlke	July 1974	January 1975
Doug Oleson	July 1974	August 1975
Ralph LaDuke (note a)	August 1974	August 1974
Eugene Baumgartner	August 1974	August 1974
Fred Cox	August 1974	August 1975
Bernard Donkersgoed	August 1974	August 1975
Wes Johnson (note a)	July 1974	August 1974
Mike Mravik (note a)	July 1974	August 1974
Ken Gumz (note a)	July 1974	August 1974
Al Wesner	July 1974	August 1974
Bob Lovoll (note a)	September 1974	September 1975
Elwood Hoffman (note a)	October 1974	November 1975
Harlan Wunsch (note a)	September 1974	
Lee Dobberstein (note a)	September 1974	
Wenzel Smejkal (note a)	November 1974	
Onoka Pufahl (note a)	October 1974	
Larry Babka (note a)	November 1974	
Joe Polich (note a)		
Bob Gust (note a)	Civil Service Commission	

Phase-1
(40 hours)

Phase-2
(40 hours)

Lansing Stephenson (note a)
Wendell Smith (note a)
Bernie Dregne (note a)
Duane Ottum (note a)
Henry Tolliver (note a)

Civil Service
Commission and
January 1976
January 1975
March 1976
August 1975
August 1975
September 1975
December 1975
May 1976
April 1976
September 1976
July 1976
August 1976

January 1976
December 1975
March 1976

July 1976

June 1976

January 1977

Pat Boland
George Ritter
Al Williams
Chuck Riley
Laurence Arts
Duane Wilman
Dick Guenther
Jim Breene
Ralph Williams
Orville Noeldner
John Erickson

a/Appointed to County Supervisory position prior to June 30, 1969, when 80 hours training became a Civil Service Commission requirement.

All first-line supervisors who were newly selected or promoted after June 30, 1969, have received, or are scheduled to receive, the required training as prescribed in Farmers Home Administration Instruction 240.3 V. All first-line supervisors prior to June 30, 1969, have received the required training in accordance with this instruction.

ONE-STOP SERVICE CENTERS

In June 1975 the Department of Agriculture prescribed a uniform method for service center State plans. The method required each State Administrative Committee to submit an implementation schedule for the entire State which listed all office locations, on a road map, of the Agricultural Stabilization and Conservation Service, Farmers Home Administration, Soil Conservation Service, Federal Crop Insurance Corporation and Extension Service and to categorize each agricultural service center location by priority of implementation, as follows:

CATEGORY A

1. Key locations having a substantial enough workload that three or more agencies will have permanent full-time staff in the foreseeable future.

CATEGORY B

1. Include those locations at which the workload is such that two or more agencies plan to have a permanent full-time staff in the foreseeable future.

CATEGORY C

1. Include those locations at which the workload is such that not more than one agency has definite plans to have a permanent full-time staff in the foreseeable future.

These implementation priorities were to be based primarily on the present and future workloads anticipated for each agricultural service center.

ONE-STOP SERVICE CENTER
IMPLEMENTATION PRIORITY SCHEDULE
FOR WISCONSIN

<u>Category A</u>	<u>Category B</u>	<u>Category C</u>
Ashland	Brown	Adams
Barron	Chippewa	Burnett
Buffalo	Columbia	Calumet
Clark	Green	Crawford
Dane	Jefferson	Door
Dodge	Kewaunee	Douglas
Dunn	La Crosse	Eau Claire
Fond du Lac	Lafayette	Florence
Grant	Langlade	Forest
Iowa	Maniwotoc	Green Lake
Juneau	Oconto	Jackson
Marathon	Pierce	Kenosha
Monroe	Price	Lincoln
Outagamie	Rusk	Marinette
Polk		Marquette
Portage	St. Croix	Milwaukee
Richland	Sauk	Oneida
Rock	Sheboygan	Ozaukee
Shawano	Walworth	Pepin
Taylor	Waukesha	Racine
Trepleau	Waupaca	Sawyer
Vernon	Waushara	Vilas
Washburn	Wood	Winnebago
Washington		

Note: As indicated on page 5, the upper limit of locations selected for service centers will be ultimately limited to the number of locations of the agency with the largest number of offices in the State.

EMERGENCY LOAN APPLICATION PROCEDURE

1. The farmer prepares an application which requires production data for disaster year and five preceding years plus other loss and reimbursement information. Form FmHA 441-22.
2. County supervisor copies above data on form FmHA 441-26 to calculate loss and eligibility. Verifies farmer's application data with Agricultural Stabilization and Conservation Service, Federal Crop Insurance, etc.
3. The farmer must obtain two or three written credit rejections from lending institutions.
4. The farmer or the county supervisor prepares a farm and home plan.
5. County Committee certification.
6. Normal loan processing procedures are followed for three of the four alternative plans followed in making the emergency loan. The alternative plans are (a) actual loss, (b) annual operating, (c) chattel adjustment, and (d) farm real estate.

See loan checkoff list on the following page.

Processing an emergency loan application to conclusion involves from 20 to 30 documents, depending on alternative plans followed to complete the loan.

Source: Minnesota State Farmers Home Administration Office

Actual Loss
 Annual
 Operating Adj.
 Real Estate Adj.
 DATE:

NAME:

WHEN REAL ESTATE SECURITY IS TAKEN

1. Preliminary Title Opinion FmHA 427-9
2. Final Title Opinion FmHA 427-10
3. Notarized Statement of Ownership
4. Real Estate Appraisal FmHA 422-1
5. Building Insurance & Receipt
6. Deposit Agreement FmHA 402-1
7. Real Estate Mortgage FmHA 427-1
8. Promissory Note FmHA 440-16
9. Nondiscrimination Agreement 440-45
10. Discuss Loan Approval Conditions
11. Dairy Assignment FmHA 441-25
12. Agreement to Give Notice of Foreclosure FmHA 427-3
13. Supplemental Payment Agreement 440-9
14. Loan Disclosure FmHA 440-41
15. Right to Recind FmHA 440-43
16. Request for Statement of Debts 440-32

WHEN CHATTEL SECURITY IS TAKEN

1. Certified Lien Search FmHA 440-13
2. Financing Statement FmHA 400-25
3. Security Agreement FmHA 440-4
4. Dairy Assignment FmHA 441-25
5. Nondisturbance Agreement FmHA 441-10
6. Appraisal of Chattel Property 440-21
7. Truck Titles
8. Deposit Agreement FmHA 402-1
9. Division of Income & Nondisturbance Agreement FmHA 441-13
10. Promissory Note FmHA 441-1
11. Request for Statement of Debts 440-32
12. Security Letter FmHA MN 462-3
13. Discuss Loan Approval Conditions
14. Other:

WHEN CROP SECURITY IS TAKEN

- | | |
|--|--|
| 1. Certified Lien Search FmHA 440-13 | 9. Copies of Written Leases |
| 2. Financing Statement FmHA 440-25 | 10. Division of Income FmHA 441-13 |
| 3. Security Agreement FmHA 440-4A | 11. Deposit Agreement FmHA 402-1 |
| 4. Wheat & Feed Grain Assignment 462-8 | 12. Promissory Note FmHA 441-1 |
| 5. Federal Crop Insurance Assignment | 13. Security Letter FmHA MN 462-3 |
| 6. Milk Assignment FmHA 441-25 | 14. Nondisturbance Agreement FmHA 441-10 |
| 7. Sugar Beet Assignment | 15. Discuss Loan Approval Conditions |
| 8. Subordination Agreement FmHA 441-5 | Other: |

(Regular and emergency loans) Source: Minnesota State FmHA office