September 2019-Present

David Grahn

Experience

b) (6)

Director, Office of Regulatory Policy, Farm Credit Administration

- Responsible for developing and issuing policy and guidance regarding the regulation of the Farm Credit System.
- Developed emergency guidance to assist the Farm Credit System operate and provide relief to borrowers in response to the COVID-19 pandemic.
- Worked with the Farm Service Agency on a lenders summit that brought beginning farmers and ranchers together with the Farm Service Agency and agricultural lenders, including the Farm Credit System, to discuss ways agricultural lenders could work more effectively with the Farm Service Agency in financing these producers.
- Work directly with the FCA Board members regarding the development of FCA policy.
- Manage an office of 18 members and its budget.

Associate General Counsel, Farm Credit Administration

January 2018-September 2019

- Responsible for legal advice to the Board of Directors and senior staff of the Farm Credit Administration.
- Worked with the House and Senate Agriculture Committees to include FCA amendments in the 2018 Farm Bill.
- Developed FCA's relationship with the Native American Agriculture Fund.
- Led FCA's response team for GAO's requests regarding their studies on Native American and Socially Disadvantaged Farmers' and Ranchers' credit opportunities.
- Participated in a number of FCA regulatory and policy workgroups, including those covering the Investment Rule, Capital Rule, YBS ANPRM, and the response to the Banks' request for reforms of capital requirements.
- Participated in OGC budget and operating plan development and other OGC management activities.

Associate General Counsel, Food Assistance, International and Rural Division, USDA February 2012-January 2018

- Responsible for legal advice provided to four of the eight Mission Areas at USDA: Rural Development, Farm and Conservation Programs, International Trade and Assistance Programs, and Nutrition Programs, the largest legal portfolio at OGC.
- Regularly advised the Office of the Secretary and sub-Cabinet, and Agency Administrators of USDA as well as officials at the Office of Management and Budget on legal issues within the Division's jurisdiction, including the interpretation of law and regulations, rulemaking procedures, and on appropriations and ethics matters.
- Provided technical assistance to the House and Senate Committees on Agriculture and to the House and Senate Committees on Appropriations.
- Managed a division of 32 members: 3 SES including myself, 25 Staff Attorneys, 3 Secretaries, and 1 Paralegal.

Associate General Counsel, Rural Development, USDA

- Responsible for legal advice provided to the Rural Development Mission Area, Farm Loan Programs of the Farm Service Agency, and the Federal Crop Insurance Corporation-Risk Management Agency.
- Regularly advised the Office of the Secretary and sub-Cabinet, Agency Administrators of USDA and officials at the Office of Management and Budget on legal issues within the Division's jurisdiction, including on the interpretation of law and regulations, rulemaking procedures, and on appropriations and ethics matters.
- Provided technical assistance to the House and Senate Committees on Agriculture and regularly to the House and Senate Committees on Appropriations.
- Managed two divisions with a total of 15 members: 2 SES including myself, 10 Staff Attorneys, 2 Secretaries, and 1 Clerk.

Assistant General Counsel, Legislative Division, USDA

- Legislative Counsel for USDA. Provided technical drafting assistance to USDA, the Office of Management and Budget and Congressional staffs, and coordinated USDA's position on legislation.
- Provided technical drafting assistance on the Agricultural Research, Extension, and Education Reform Act of 1998, the Agricultural Risk Protection Act of 2000, and the Farm Security and Rural Investment Act of 2002, as well as on each of the USDA appropriations acts during this period.
- Managed a division with a total of 3 members: 1 GS manager including myself, 1 Staff Attorney, and 1 Secretary.

November 2002-January 2012

May 1996 -October 2002

Counsel to the Senate Agriculture Committee Confidential Assistant to the Administrator, Agricultural Stabilization and Conservation Service/Farm Service Agency Associate, Arent/Fox Law Firm, Washington, DC Staff Attorney, Office of the General Counsel, USDA

Education

Juris Doctorate, University of Minnesota Law SchoolMay 1986Bachelor of Arts, Carleton College, Northfield, MinnesotaJune 1982

May 1995 - April 1996

May 1992 – April 1995 March 1991 – April 1992 September 1986 – February 1991