



April 12, 2013

Policy and Oversight Division  
Office of Grants and Financial Management  
National Institute of Food and Agriculture  
U.S. Department of Agriculture, STOP 2299  
1400 Independence Avenue, SW  
Washington, DC 20250–2220

**Re: NSAC Comments on AFRI FY13 Foundational Program RFA**

Submitted via Email to: [Policy@nifa.usda.gov](mailto:Policy@nifa.usda.gov)

The National Sustainable Agriculture Coalition (NSAC) welcomes the opportunity to submit comments on the Agriculture and Food Research Initiative (AFRI) Foundational Program Request for Applications (RFA) issued for Fiscal Year 2013. In addition to the attached written comments, NSAC also presented oral and written comments in advance of the release of the FY13 AFRI RFA at a stakeholder listening session hosted by the National Institute of Food and Agriculture in February 2012 in Washington, D.C. and incorporate those recommendations here as well as by attaching them as appendix A, beginning on page 6.

The National Sustainable Agriculture Coalition is a national alliance of over 40 family farm, food, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture. NSAC has had a research, extension, and education committee since its founding in 1988 and research issues remain a very important priority for the Coalition. NSAC's research policy work focuses on the development, funding, and implementation of USDA and other federal research, education, extension, and integrated programs that examine and advance sustainable food and agricultural systems.

In our view, AFRI must offer enhanced support to the development of sustainable food and agricultural systems in order to meet its broad goals set forth with its establishment in the 2008 Farm Bill. While some advances have been made in this respect, overall the performance of the program with respect to sustainable systems is lagging. Our continued support for the program hinges on a more concerted transformation of the program's commitment to sustainable agriculture. We recognize that such a change is necessarily bigger than any single RFA and will take a multi-year commitment. Yet we also recognize the importance of building toward transformational change step by step through each RFA.

In that light, NSAC makes the following recommendations on the AFRI Foundational Program RFA for FY 2013 as well as on overall AFRI program administration. Our recommendations aim to further the goals of sustainability through AFRI and to support research with increased likelihood of delivering on the agency's desired outcomes.

## **Part I: Recommendations on Research Priorities**

### **1. Public Plant and Animal Breeding**

NSAC and many other groups have been requesting for many years that AFRI designate a subprogram for conventional plant breeding and for conventional animal breeding consistent with their designation as AFRI priorities in the 2008 Farm Bill and with directives from Congress in the last eight agricultural appropriations bills.

We are pleased to see that the language related to conventional plant breeding is clearer in this year's RFA, including specific reference to "cultivar development" and "public plant breeding programs." However, we are still concerned that these topics remain a subhead within the *Plant Breeding for Agricultural Production* program area priority that also includes research on plant genome structure and function and phenomics. This combined approach has proven problematic in the past, such that few if any conventional, public breeding projects are ever awarded.

In future RFAs, we continue to urge USDA to develop a separate program area priority within AFRI's Foundational Program RFA dedicated to classical plant and animal breeding (unencumbered with mandatory requirements for genomics work) intended to lead to the release of publicly held varieties and breeds, and with priority placed on regionally adapted breeds and varieties, including breeding for organic and sustainable farming systems, pest and disease resistance and resilience to climate change. Additional recommendations are included in Appendix A, beginning on page 6.

The FY 14 RFA is, in our view, a make or break moment for the program and the agency. Either it comes into compliance with the will of Congress and the strong, repeated recommendations of a significant constituency of researchers and farm organizations, or it continues down the road of trying to get by with token efforts to create the appearance of compliance. The time is now to demonstrate good faith and establish a fully fledged, ongoing program area with significant funding for conventional public plant and animal breeding and cultivar development.

### **2. Managed Ecosystems**

We are disappointed that within the Renewable Energy, Natural Resources, and Environment Program Area, two of the three previous program priorities are eliminated from the FY 2013 RFA. The long-standing *Management in Agroecosystems* priority in particular, has provided a critical source of funding for research projects that have helped develop innovative management practices to expand ecosystem services in actively managed ecosystems, including social, economic and behavioral barriers to adoption. This year's solicitation seems to be more focused on mitigation of our current agricultural pollution problems rather than on sustainable, ecologically-based solutions. We strongly urge USDA to restore and enhance both the *Management in Agroecosystems* and *Thresholds in Agroecosystems* program area priorities in future RFAs.

### **3. Agriculture Economics and Rural Communities**

We are pleased to see a host of new priorities in this year's RFA that focus on research on local and regional food systems, immigration policies, farm labor, and beginning, small and medium-sized farms. We are also pleased to see that farm entry, transition, and viability remain subtopics within

the Small and Medium-Sized Farms subprogram, and the new Entrepreneurship program priority calls for business development strategies to promote the sustainability of small and medium-sized farms and rural communities. We would urge USDA to include and expand upon these innovative and important research topics in subsequent RFAs.

As much as we appreciate and applaud the strong performance of the Agricultural Economics and Rural Communities area, we remain concerned that these vital issues have not been integrated as well as they should be in the other AFRI areas of work. We recommend that the agency hold a symposium in the near future on this topic to explore ways of integrating these societal concerns into AFRI work and funding in plant and animals and natural resources and environment as well as appropriate challenge areas.

#### **4. Organic and other Sustainable Agriculture Priorities**

Consistent with previous RFAs, we are discouraged that there is no mention of “organic agriculture” in any of the program areas within the Foundational RFA, which is especially concerning this year, as the sole federal research program that funds organic research – the Organic Agriculture Research and Extension Initiative (OREI) – has officially expired with the expiration of the farm bill last fall. Although we recognize the importance of having a stand-alone program whose primary focus is funding on-farm, stakeholder-driven research on organic agriculture, we see no reason why research on organic production systems is not once mentioned as a valid research topic for an AFRI Foundational Grant, particularly when many of the statutory priorities<sup>1</sup> for AFRI are relevant to both conventional and organic production systems.

In future RFAs, we continue to urge the agency to increase the emphasis on organic production systems within the AFRI portfolio, by explicitly including a reference to organic agriculture or production systems in each relevant program area.

Finally, we are disappointed that the priority area on *Plant-Associated Insects and Nematodes* has drifted *away* from ecosystems approaches, toward more molecular, chemical, and genetic level studies, and are especially concerned with the omission of the priority on research that is “applied to ecologically based management programs” that was included in the 2011 RFA. This represents a significant step backwards and shifts the program area away from a systems approach to a much more narrowly focused approach, and we encourage future RFAs to reinsert this priority back into the program.

### **Part II: Recommendations on Program Implementation**

#### **5. Timing of RFA**

With respect to timing of the release of the RFA, NSAC and other agricultural research stakeholders were frustrated with the continual delays in the release of the 2012 AFRI Foundational RFA. As AFRI is the single largest competitive grants program responsible for funding basic and applied research that is fundamentally important to ensuring the continued success of agricultural producers across the country, it was extremely discouraging to NSAC and many others within the research community to go an entire grant cycle (and agricultural season) without the roughly \$80 million in

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<sup>1</sup> See Subsection (b) of the Competitive, Special, and Facilities Research Grant Act (7 U.S.C. 450i(b))

new research funding that has typically been available through the Foundational program. Given that the Foundational RFA (the agency's term for what the farm bill calls the AFRI priorities) is the only actual statutorily authorized RFA, this skipped year is all the more concerning.

Although we recognize that NIFA's administration of the AFRI program is tied to the annual congressional appropriations process, and that gridlock on the hill can hamper USDA's efforts in timely program delivery, it is vital that NIFA, to the maximum extent possible, do what they can to minimize delays in the release of an RFA.

We therefore urge the agency to undertake whatever steps necessary in the RFA planning and development stages to adhere to a reliable RFA publication and application deadline schedule in the future, while operating within the constraints of the annual appropriations process. If achieved, this will greatly improve stakeholder outreach and response to published RFAs, and will allow research teams greater certainty regarding when major deadlines, such as Letter of Intent or full proposal submissions, occur each year.

Additionally, we strongly urge USDA to incorporate sufficient time between the publication of an RFA and the LOI or full proposal deadline. After the Foundational Program RFA was delayed by almost an entire year, applicants were only given in some cases barely a full month to develop and submit a Letter of Intent, which is required in many cases before being invited to submit a full proposal.

## **6. Funding Levels**

While we were pleased when the combined FY 2012/2013 RFA was eventually released in October of 2012 (roughly 21 months after the FY 2011 RFA), we were disconcerted with the lower than expected funding levels included in the Foundational RFA. The FY 2011 Foundational RFA made approximately \$78 million available for new grants, a slight increase from previous years. Since the creation of the AFRI program in the 2008 Farm Bill, there has been consistent stakeholder feedback to the agency to restore balance in the total funding allocated to Foundational and Challenge grants.

Since no awards were made through the Foundational program in FY 2012, it would be reasonable to expect the combined FY 2012/2013 RFA to include twice as much funding than a single year RFA, or roughly \$156 million for the FY 2012/2013 Foundational RFA. However, the total funding made available in this RFA is only \$136 million, which represents a 13 percent decrease in the available funding for this program in FY 2013. We continue to urge the agency to reverse this trend in future RFAs and increase the total funding available for the foundational program.

Again, we reiterate that this is the only AFRI area mandated by statute. The challenge areas are an administratively created construct not specifically authorized by law. We have not challenged this agency construct and will not in the future if there is a move toward a healthier balance.

## **7. Integrated Projects and Eligible Entities**

Since the creation of AFRI in the 2008 Farm Bill, NSAC and other stakeholders have been advocating for increased funding opportunities for integrated research, education, and extension projects, and to allow a variety of interested stakeholders to apply for these funds, including non-profit organizations and other institutions that work directly with farmers. However, despite

substantial stakeholder input, this issue remains unresolved in this latest RFA which continues to restrict “integrated projects” to only academic institutions, in stark contrast to the agency’s statutory requirements.

This is an unfortunate missed opportunity that would allow a wider variety of research partners to participate in these multifaceted projects that aim to not only conduct research, but actually get that research out to the field where farmers and other stakeholders can benefit. We urge the agency to rectify this issue by opening up each AFRI RFA to the widest varieties of stakeholders possible, including both integrated and single function projects.

We have been urging this action for five years now and believe we have been callously dismissed by the agency, with no attempt being made to rectify the problem. We are extremely disappointed and troubled by the way we have been treated on this matter, and more importantly, that the issue is not being resolved for the good of the program and the country. We plead yet again for real engagement on this matter and a commitment from the program and the agency to reaching a resolution.

## **8. Improved Information on Outcomes of Awards**

Though there is some good reporting of overall information concerning the results of the AFRI granting process, we would hope in the future that there would be more detailed and timely information provided to the public. In particular, it would be useful to know how many letters of intent were submitted for each specific program area and how many were successful in receiving an invitation to submit a full proposal. The same would be of great benefit for the actual grant applications submitted for each program area priority code. Additionally, a breakdown of these success and failure rates for each specific program, as well as information about types of applicants applying for each program area – including collaborations across colleges and universities, agencies and non-profit organizations – would aid in evaluating the program for future improvement.

We realize that some of this information is provided in the annual AFRI Synopsis, albeit there is usually at least a two year lag time, but not to the level of specification that is needed at the program area level to be useful in using the results as a basis for future research efforts and program evaluation.

In closing, NSAC and our member groups across the country believe that there is much promise for research focused on sustainable agricultural systems through the AFRI program. We thank you for serious consideration of our recommendations, and would welcome any additional feedback we can provide.

Sincerely,



Ferd Hoefner, Policy Director  
National Sustainable Agriculture Coalition



Juli Obudzinski, Policy Associate  
National Sustainable Agriculture Coalition

## **Appendix A. – NSAC Comments on 2013 AFRI RFA**

March 22, 2012

Agriculture and Food Research Initiative  
Institute of Food Production and Sustainability  
National Institute of Food and Agriculture  
U.S. Department of Agriculture, STOP 2220  
1400 Independence Avenue, SW  
Washington, DC 20250–2220

### **Re: NSAC Comments on AFRI FY13 RFA – Docket Number NIFA-2012-0004**

Submitted via Email to: [afri@nifa.usda.gov](mailto:afri@nifa.usda.gov)

The National Sustainable Agriculture Coalition (NSAC) is grateful for the opportunity to submit comments on the Fiscal Year 2013 Agriculture and Food Research Initiative (AFRI) Request for Applications (RFA). Additionally, these comments were presented as oral testimony at the February 22, 2012 stakeholder listening session hosted by the National Institute of Food and Agriculture in Washington, D.C.

The National Sustainable Agriculture Coalition is a national alliance of over 40 family farm, food, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture. Research, extension, and education are key issues for our coalition. In 2009, NSAC co-founded the AFRI Coalition, which now represents over 40 professional scientific societies and agricultural stakeholders. NSAC’s research policy work focuses on the development, funding, and implementation of USDA and other federal research, education, extension, and integrated programs that examine sustainable food and agricultural systems, including the AFRI program.

NSAC applauds USDA’s renewed commitment to outcomes-oriented research. In our view, AFRI must offer enhanced support to the development of sustainable food and agricultural systems in order to meet its goals. Therefore, NSAC makes the following recommendations on research priorities for the AFRI FY 2013 RFAs as well as on AFRI program administration. Our recommendations aim to further the goals of sustainability through AFRI and to support research with increased likelihood of delivering on the agency’s desired outcomes.

### **Part I: Recommendations on Research Priorities for AFRI FY 2013 RFAs**

#### ***1. Classical Breeding***

**AFRI should provide adequate resources and priority to research projects that lead to the release of farmer-ready public crop varieties and livestock breeds.**

Despite the clear call from Congress for USDA to address our nation’s classical plant and animal breeding needs, the AFRI RFAs released since the passage of the 2008 Farm Bill have fallen well

short in addressing those needs. The FY11 RFA<sup>1</sup> took a small step in response to our call for more attention to conventional plant and animal breeding by specifically including language that allows funding for conventional breeding but only in direct competition with genomics and biotechnology. This minor improvement falls far short of the congressional mandate for classical plant and animal breeding programs that include farmers and ranchers as participants and are provided with long-term grants necessary to conduct effective research and development of improved seeds and breeds for public release. Furthermore, this slight modification in the FY11 RFA did not result in increased funding of classical breeding projects.

In order to ensure that the congressional mandate for increased research and resources for classical plant and animal breeding is achieved, we recommend that:

- Five percent of total AFRI funding be dedicated to classical plant and animal breeding projects, unencumbered by mandatory requirements for genomics work, which is intended to lead to the release of farmer-ready public crop varieties and livestock breeds, with priority placed on regionally adapted breeds and varieties, and breeding for organic and sustainable farming systems, pest and disease resistance, and resilience to climate change; and
- AFRI review panels for these classical breeding programs include a majority of reviewers with strong demonstrated expertise and experience in classical breeding.

Priority for awarding competitive grants should be given to projects that:

- Include multi-disciplinary teams composed of public and/or private breeders, ARS researchers, farmers and ranchers, and non-governmental organizations;
- Create or reinvigorate Farmer-Breeder programs, including the targeting of resources and programmatic oversight for on-farm participatory breeding, germplasm screening and evaluation, by improving access to current germplasm collections for on-farm dynamic conservation by trained farmers; and
- Have as a primary goal ensuring the rapid availability of locally and regionally adapted public cultivar options and animal breeds for farmers and ranchers of each region of the country.

Finally, grant awards should also be made to individuals for projects of exceptional promise in developing local and regional plant cultivars and animal breeds suitable for organic and sustainable production systems.

Ongoing analysis and tracking of awards for classical breeding should be a priority for classical breeding grants to ensure that a diverse range of crop and animal breeding needs are being met in a timely and transparent manner.

## *2. Sustainable and Organic Farming Systems*

**There needs to be an expanded emphasis on organic and sustainable farming systems, within both the foundational and challenge grant areas.**

The 2008 Farm Bill expressly mandated key foundational research areas for AFRI with priorities that support the development of sustainable farming and food systems, and although we like the idea of challenge areas, there needs to be a balance between the authorized foundational programs and the

challenges. We therefore recommend that a minimum of 50 percent of AFRI funding be devoted to the foundational priorities established in the 2008 Farm Bill.

We also believe there needs to be an expanded emphasis within AFRI on organic and sustainable farming systems by:

- Requiring a minimum of 10 percent of AFRI funding be devoted to organic systems;
- Prioritizing projects that investigate the benefit of diversified crop rotations and integrated crop-livestock systems; and
- Renaming the Bioenergy Challenge Area to “Energy Conservation and Renewable Energy for Farms and Rural Communities” and expanding AFRI’s energy priorities beyond predominant biofuel crops to include research, extension, and education into second generation bioenergy crop production and processing to meet on-farm and local community needs, as well as energy conservation and solar and wind energy development on-farm and within rural communities.

### *3. Beginning Farmers and Ranchers*

**In response to the Secretary’s call to grow the next generation of farmers, we recommend that AFRI include an emphasis on the unique concerns related to beginning farmers and ranchers.**

NIFA has previously acknowledged the importance of funding research that addresses the unique challenges of small and mid-sized producers by creating a priority area within the AFRI program. The same is needed to address the pressing concerns that beginning farmers face. This new priority area would be most appropriately located within the Agriculture Economic and Rural Communities program area and would include research projects that focus on:

- Developing new farmer training models;
- Assisting socially disadvantaged and immigrant farmers;
- Providing support for farm and land transition and farm transfer;
- Making rental land accessible as an entry option;
- Providing lower risk production start-up options;
- Examining alternative marketing and financing strategies;
- Enabling beginning farmer profitability; and
- Exploring farm viability strategies.

### *4. Economic Development through Local and Regional Agriculture*

We support the emphasis in the past few AFRI RFAs on local and regional food systems research. Congress enabled the agency to make such awards through the AFRI priority on Agriculture Economics and Rural Communities, and we support continuing and expanding the call for projects related to the development and success of local and regional food systems.



## Part II: Recommendations on AFRI Program Administration

### *5. Integration of Research, Education, and Extension Activities*

**We recommend that additional foundational programs within AFRI be opened up to include integrated research, education, and extension projects.**

We applaud the inclusion of integrated projects in the Agriculture Economics and Rural Communities Program Area in the FY 2011 RFA, and feel there is a great need for integrated activities to stimulate entrepreneurship across rural America. We urge the agency to consider opening up other foundational program areas to integrated projects in future RFAs. The foundational programs are the ones authorized by Congress, and Congress clearly directed at least 30 percent (a minimum, not a maximum) of all awards, including foundational awards, be integrated. Moreover, whether in the foundational programs or in the challenge areas, the decision on whether to seek research only (or extension or education only) or integrated projects should be made on a case-by-case basis, based on the merits of the RFA category or subcategory and the related goals and not on an artificial line of demarcation.

### *6. Eligibility and Competition*

**We strongly recommend that NIFA take steps to ensure that the implementation and administration of AFRI complies with statutory language calling for a *diversity of eligible applicants* by requiring that each AFRI RFA be fully competitive and open to all applicants, and must include both integrated and single-function projects.**

We object to the agency's neglect of Congress's intent to allow AFRI integrated project grants to be open to a wide array of entities, beyond universities and colleges. These include individuals, non-profit organizations, and other research institutions and organizations, as well as a combination of these entities.

The statute states the following (emphasis added):

Subsection (b) of the Competitive, Special, and Facilities Research Grant Act (7 U.S.C. 450i(b))

(4) GENERAL ADMINISTRATION.—In making grants under this subsection, the Secretary shall—

(E) in seeking proposals for grants under this subsection and in performing peer review evaluations of such proposals, **seek the widest participation of qualified individuals** in the Federal Government, colleges and universities, State agricultural experiment stations, and the private sector.

(7) ELIGIBLE ENTITIES.—The Secretary may make grants to carry out research, extension, and education under this subsection to—

(A) State agricultural experiment stations;

- (B) colleges and universities;
- (C) university research foundations;
- (D) other research institutions and organizations;
- (E) Federal agencies;
- (F) national laboratories;
- (G) private organizations or corporations;
- (H) individuals; or
- (I) any group consisting of 2 or more of entities described in subparagraphs (A) through (H)

**The statute is crystal clear with respect to both the list of who is eligible for all grants under AFRI and is also clear in its specific directive that the agency seek the widest possible participation in the program.**

We therefore strongly recommend that the agency take steps to ensure that the implementation and administration of AFRI complies with statutory language calling for a diversity of eligible applicants by requiring that **each AFRI RFA** be fully competitive and open to all applicants, and must include both integrated and single-function projects.

### *7. Smaller Grants for Innovative Projects*

**We recommend that AFRI grant programs award grants of all sizes, including smaller grants for innovative projects.**

We agree that there is a need for multi-institutional, collaborative research projects that require a significant federal investment, in order to address significant challenges of pressing national concern. We also believe that smaller budget projects can stimulate the innovation and resourcefulness of some of our country's best problem solvers, including farmers themselves, smaller academic institutions, non-profit research organizations, and inquisitive researchers working on cutting edge research projects that address the needs of sustainable agriculture. We therefore recommend that both the major foundational priorities and the challenge areas within AFRI include small grants for innovative projects and that at least 40 percent of program funds be devoted to smaller projects that request \$1 million or less in funding per year.

### *8. Streamlined Application Process*

**We recommend that NIFA take steps to streamline the application process and reduce the administrative requirements for applicants with limited institutional capacity.**

In addition to administrative limitations on eligibility, the grant application procedures for AFRI are clearly targeted to large-scale, multi-institutional grants, with nearly 300 pages needed to complete a grant proposal. This process discourages smaller eligible institutions and organizations from

submitting grant proposals for smaller projects that request less funding but could pay off with big results. We therefore recommend that NIFA take steps to streamline the application process and reduce the administrative requirements for applicants with limited institutional capacity, including non-profit organizations and on-farm researchers, to ensure that these groups are able to be successful in competing for federal research grants.

In closing, NSAC and our member groups across the country believe that there is much promise for research focused on sustainable agricultural systems through the AFRI program. We thank you for serious consideration of our recommendations, and would welcome any additional feedback we can provide.

Sincerely,

*Ferd Hoefner*

Ferd Hoefner, Policy Director  
National Sustainable Agriculture Coalition

*Juli Obudzinski*

Juli Obudzinski, Policy Associate  
National Sustainable Agriculture Coalition

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<sup>i</sup> To date, the FY 2012 RFA for the Foundational Program within AFRI has not yet been released. We are therefore making recommendations based on the FY 2011 Foundational RFA.