



**Farmers Market and Local Food Promotion Program:  
Recommendations for Program Implementation and 2014 Request for Applications**

The National Sustainable Agriculture Coalition (NSAC) has been closely involved in advocating for the creation of the Farmers Market and Local Food Promotion Program (FMLFPP). We designed the legislation in 2001 and led the campaign to secure its addition to the farm bill in 2002. We led the charge to provide mandatory funding in 2008.

More recently, we crafted and secured legislative champions for the Local Farms, Food, and Jobs Act (LFFJA), a marker bill which included, among other provisions, the expanded Farmers Market and Local Food Promotion Program. In Fall 2011 and again in early 2013, Senator Sherrod Brown (D-OH) and Representative Chellie Pingree (D-ME) introduced the Local Farms, Food, and Jobs Act (LFFJA), which proposed comprehensive changes to a wide variety of USDA programs. With the support of nearly 100 legislative co-sponsors and over 280 organizational supporters, LFFJA contained provisions vital to supporting local and regional food systems, creating economic opportunities for farmers, and improving healthy food access for all consumers. NSAC's advocacy led to several LFFJA provisions, including FMLFPP, being included in both the House and Senate versions of the Farm Bill, and to FMLFPP being retained in the final Farm Bill conference report.

On behalf of our 40 Represented Members<sup>1</sup>, we offer the following recommendations, reflecting important considerations for the development of the Farmers Market and Local Food Promotion Program and forthcoming 2014 Request for Applications (RFA). We appreciate the opportunity to provide comments. If you have any questions, please feel free to contact us.

Sincerely,

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Policy Specialist

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Policy Director

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<sup>1</sup> Agriculture and Land-Based Training Association - Salinas, CA; Alternative Energy Resources Organization - Helena, MT; California Certified Organic Farmers - Santa Cruz, CA; California FarmLink - Santa Cruz, CA; C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture) - Hereford, TX; Center for Rural Affairs - Lyons, NE; Clagett Farm/Chesapeake Bay Foundation - Upper Marlboro, MD; Community Alliance with Family Farmers - Davis, CA; Dakota Rural Action - Brookings, SD; Delta Land and Community, Inc. - Almyra, AR; Ecological Farming Association - Soquel, CA; Farmer-Veteran Coalition - Davis, CA; Fay-Penn Economic Development Council - Lemont Furnace, PA; Flats Mentor Farm - Lancaster, MA; Florida Organic Growers - Gainesville, FL; GrassWorks - New Holstein, WI; Hmong National Development, Inc. - St. Paul, MN and Washington, DC; Illinois Stewardship Alliance - Springfield, IL; Institute for Agriculture and Trade Policy - Minneapolis, MN; Iowa Natural Heritage Foundation - Des Moines, IA; Izaak Walton League of America - St. Paul, MN/Gaithersburg, MD; Kansas Rural Center - Whiting, KS; The Kerr Center for Sustainable Agriculture - Poteau, OK; Land Stewardship Project - Minneapolis, MN; Michael Fields Agricultural Institute - East Troy, WI; Michigan Food & Farming Systems (MIFFS) - East Lansing, MI; Michigan Organic Food and Farm Alliance - Lansing, MI; Midwest Organic and Sustainable Education Service - Spring Valley, WI; National Catholic Rural Life Conference - Des Moines, IA; The National Center for Appropriate Technology - Butte, MT; Nebraska Sustainable Agriculture Society - Ceresco, NE; Northeast Organic Dairy Producers Alliance - Deerfield, MA; Northern Plains Sustainable Agriculture Society - LaMoure, ND; Northwest Center for Alternatives to Pesticides - Eugene, OR; Ohio Ecological Food & Farm Association - Columbus, OH; Organic Farming Research Foundation - Santa Cruz, CA; Rural Advancement Foundation International - USA - Pittsboro, NC; Union of Concerned Scientists Food and Environment Program - Cambridge, MA; Virginia Association for Biological Farming - Lexington, VA; Wild Farm Alliance - Watsonville, CA.

## RECOMMENDATIONS

### Overall Program Recommendations

#### 1. *Program Structure*

**The new expanded FMLFPP should be run as an integrated and comprehensive program.** We recommend that, except in unusual circumstances, there should be a single Request for Applications for the program. The RFA can then state the common and integrated elements that apply to the whole program, yet can also be divided into specific details about the direct marketing portion of the program and the local and regional marketing (non-direct marketing) portion of the program, and divided as well, when appropriate, between different types of funding types and opportunities. As with many other USDA competitive grants programs, there can be multiple deadlines for different elements of the program and different review committees and evaluation criteria, as needed, to run the program efficiently and effectively.

In the first year of the program, it may be necessary to offer two separate RFAs, in order to reach direct-marketing applicants as early in the season as possible. Subsequent years should remain under one RFA.

We also stress that the program should be as comprehensive as possible in supporting the wide variety of different types of direct farmer-to-consumer marketing and the wide variety of marketing channels used to distribute foods locally and regionally. The program should be much more than a program to support farmers markets and food hubs. As important as those particular venues and enterprises are, farmers markets and food hubs are only a portion of what constitutes direct and local and regional marketing and what will be needed for farmers and communities to thrive through new market development. Other examples of potential projects that can support new market development are farm-to-institution, mid-tier value chains, cooperative-based (aggregated) community supported agriculture, networked food coops, and other regional distribution networks. The FMLFPP should strive for a balanced, comprehensive, and innovative portfolio.

#### 2. *Program Purpose*

**The program must continue to demonstrate a direct benefit to farmers.** Among the main purposes of FMLFPP is “to develop new market opportunities for farm and ranch operations serving local markets, by developing, improving, expanding, and providing outreach, training, and technical assistance to, or assisting in the development, improvement and expansion of<sup>2</sup> both direct-to-consumer marketing outlets and infrastructure supporting local and regionally produced food products.

As a program that, at its core, seeks to benefit farmers serving local and regional markets, FMLFPP should continue to focus on assisting farmers with economic opportunities. At a minimum, funded projects should demonstrate a direct benefit to farmers and emphasize and prioritize direct farmer participation in all elements of the project, including project

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<sup>2</sup> Agricultural Act of 2014, Public Law 113-7, Section 10003, Pages 772-773.

development, decision making, and evaluation. These projects of course should be of mutual benefit to consumers, without whom there is no market. Not all markets are created equal, however. Some boost farm income and assist the long-term viability of small and mid-scale family farms while others work against those objectives. Hence, we think it is critical that farmers have a major voice in the projects.

Direct benefits to farmers should also be a regular part of program reporting and evaluation, including simple post-project surveys asking participating or affected farmers whether they have experienced increases in numbers of customers, volumes sold, sales, and/or income and if so of what magnitude.

### ***3. Administrative Council or Operations Committee***

**The program should include an administrative council or operations committee to help guide all aspects of the program.** The council or committee should be established by regulation. It should be made up of all the FMLFPP program staff, a representative from AMS, FNS, RBCS, FSIS, and NIFA, a person representing state departments of agriculture, at least six representatives of farm and non-profit organizations with expertise in direct marketing or local and regional food systems, and other persons with special expertise as may be designated by the Secretary.

The council or committee should help: establish goals for the program, annual priorities, and criteria for the selection of projects; coordinate policies, procedures, and activities, guide program publications, communications, and evaluation; and promote the program. It should meet at least twice annually.

### ***4. Eligible Applicants***

**Types of eligible applicants should be broadly defined and widely publicized.** Among the entities eligible to apply for funds under the old FMPP are “an agricultural cooperative or a producer network or association.” With the 2014 Farm Bill, the categories of eligible entities would be expanded to now include “an agricultural cooperative or other agricultural business entity or a producer network or association including a community supported agriculture network or association.”

In order to best serve the expanded uses for FMLFPP grants, AMS should not only make this clarification explicit in all publications related to FMLFPP, but should make sure to emphasize this and other changes from the Farm Bill in any outreach to potential applicants.

Producer networks and associations should be defined very broadly and should not require incorporation or other formal business entity status, provided the decision making structure is clear and viable.

### ***5. Priority Consideration***

**In order to demonstrate meeting the criteria for priority consideration, projects should be allowed flexibility in using various mapping tools and resources.** A priority category is

created by the Farm Bill that requires priority consideration be given to applications that include projects that benefit underserved communities, including communities that—

- “(1) are located in areas of concentrated poverty with limited access to fresh locally or regionally grown foods; and
- (2) have not received benefits from the Program in the recent past.”

Note that the 2014 farm bill definition of underserved communities is different from the definition of “food deserts” as provided in the 2012 Guidelines for the FMPP program, which focuses on proximity to a supermarket or grocery store. Instead, the Farm Bill states that underserved communities include those that have “limited access to fresh locally or regionally grown foods.”

Much like CDFI applicants for the CDFI Fund’s Healthy Food Financing Initiative, FMLFPP applicants seeking priority consideration for projects benefiting underserved communities should be allowed to use a variety of mapping tools, including the USDA’s ERS Food Environment Atlas, Farm to School Census data, and more nuanced analyses such as qualitative assessments, including community food assessments and assessments performed by nonprofit organizations such as The Food Trust<sup>3</sup>, in order to demonstrate that a community is located in an area “of concentrated poverty with limited access to fresh locally or regionally grown foods.”

Communities that have not received program awards in the recent past might be best defined as within the last three years. This provision will help ensure that all regions of the country are benefiting from the program. In making awards, the program should strive to ensure geographical diversity and coverage to the maximum extent practicable.

To be clear, we are not recommending that projects that previously received funding under FMPP or FMLFPP would be ineligible to apply for and receive funding each year. Rather, we are recommending that preference be given to projects that have not received benefits from this program in the recent past.

## **6. Grant Types**

**Grants should continue to support multiple types of activities, including categories such as (1) planning/development, (2) implementation, and (3) training/technical assistance.** The 2012 Guidelines for FMPP provide grants for a variety of activities – including planning, implementation, evaluation, training, and technical assistance. FMLFPP should continue to provide funding for a variety of activities.

The Farm to School Grant Program, Beginning Farmer and Rancher Development Program, and Community Food Projects Grant Programs provide some examples of how eligible funding uses are categorized by different types. For instance, the Community Food Grant program provides for project grants, planning projects, and training and technical assistance grants. The BFRDP provides for standard grants as well as development grants. Farm to School provides planning grants, implementation grants, and support service grants. For technical assistance and

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<sup>3</sup> For more information, see: [http://foodtrust-prod.punkave.net/uploads/media\\_items/hffhandbookfinal.original.pdf](http://foodtrust-prod.punkave.net/uploads/media_items/hffhandbookfinal.original.pdf)

training, activities could include assistance to grantees and potential grantees in developing proposals, as well as for project development and implementation along the lines of business planning, programming, operations, and management.

For starters, we suggest that AMS should perhaps delineate three distinct grant categories: (1) planning/development, (2) implementation, and (3) training/technical assistance. Over time these may change or evolve. For instance, periodically there could also be an external program evaluation grant, though that would likely occur only once every three to five years.

## ***7. Peer-to-peer training and networking***

**Provide opportunities to enable grantees the opportunity to assist one another through trainings and networking.** Grantees stand to benefit from training not only from USDA staff and professional grant writers/evaluators and technical service providers, but also from one another. For the projects supported by the FMLPP, the expertise is in the field. To the extent possible, Administrative funds should be used to support peer-to-peer learning. This can be through a variety of means, including remote assistance (e.g. webinars, videoconferencing, conference calls) and in-person events. The needs of the field are best met when practitioners are involved in framing and planning (e.g. setting the agenda, review proposed conference speakers/panels) for these learning and networking opportunities. These activities should provide opportunities for learning and improving practices in the field and supporting the capacity of potential applicants for applying to the FMLPP, including grant proposal development, compliance, and evaluation.

To ensure the best use of administrative funds, any in-person convenings should have a clear purpose, the opportunity for grantee input into planning the convening, and the ability to accomplish goals that cannot be achieved through other virtual gatherings (whether via phone or the internet). Any in-person convenings should, to the extent possible, piggyback on related gatherings dealing with direct marketing channels for farmers or local and regional food enterprises facilitating sales from local producers.

## ***8. Grant Terms and Minimum/Maximum Amounts***

**AMS should adopt the following standard terms and amount caps:**

- Training and technical assistance awards should be limited to no more than 15 percent of total funding.
- Minimum grant awards for all categories should continue to be \$5,000, as provided in the 2012 FMPP Grant Guidelines.
- Maximum award amounts for planning grants should be \$75,000.
- Maximum award amounts for Training and Technical Assistance and Implementation grants should be \$250,000.
- Grant terms should be a minimum of 1 year to a maximum of 3 years.

- No cost extensions should be allowed when fully justified and approved, but should not be allowed merely for the purpose of using unobligated balances.

## ***9. Proposal Development and Timeline***

**Provide at least 60 days from an RFA publication to the proposal deadline.** Once an RFA is announced, AMS should provide, at a minimum, 60 days for applicants to submit proposals. This timeframe will provide applicants with adequate time to develop and submit proposals. When possible, a 75-day timeframe would be ideal.

**Release the RFA in late fall and announce and disburse awards in the early spring.** In order to encourage high quality applications and enable applicants to have more time to develop their proposals, the RFA should be released early in the new fiscal year, preferably no later than November or early December, when the season slows down considerably for producers and those who work in the sale and marketing of locally produced foods. Additionally, AMS should announce and disburse awards by the early spring, prior to the height of the growing season and the high season for the marketing and sales of locally produced foods. This timing would enable projects funding in time for preparation and implementation of projects.

**Provide adequate and timely outreach, materials, and technical assistance to potential applicants.** To ensure a healthy and diverse pool of applicants, AMS should provide ample notice, assistance and outreach on FMLFPP to potential applicants through press releases, USDA and other websites, the Federal Register, webinars, guidance materials, and phone and email. Additionally, AMS should partner with university Extension services and coalitions such as the National Sustainable Agriculture Coalition, the Farmers Market Coalition, and many others to disseminate information about FMLFPP through member notices, trainings, webinars, and materials. In addition to providing at least 60 days for applicants to work on their proposals, AMS should strive to provide significant advance notice of an upcoming RFA to coalitions and networks that can help get the word out.

## ***10. Application Acknowledgment***

**The receipt of all applications should be acknowledged within a set number of days established in the RFA.**

## ***11. Application Review Process***

***All applicants should be afforded the opportunity to submit a pre-proposal or at least have the opportunity to have a preliminary judgment on the eligibility of a proposal.***

This could be done as a full pre-proposal process as is common for NIFA competitive grants, or as an eligibility review similar to Rural Development's VAPG program. In the long run, a full-blown pre-proposal process is probably best for the success of the program. It would also be helpful if potential applicants could consult with AMS for a quick eligibility determination, perhaps using an online web form with the potential for follow-up with AMS staff directly.

**Adopt mechanisms for a fair and effective review process.** A fair and effective review process begins with a diverse and highly qualified peer review panel and clarity and transparency in the rules and procedures governing the review process.

Among the specific mechanisms we hope will be adopted are:

- Cast a wide net for a diverse and highly qualified set of peer reviewers at least 60 days prior to an anticipated RFA.
- Reviewers should include representatives familiar with farming, marketing, economic development, and infrastructure for direct and local and regional agricultural markets, including farmers as well as experts within relevant scientific, education, extension, and business fields.
- The composition of review panels should maintain a balanced composition of reviewers with regard to minority and female representation and an equitable age distribution.
- The specific identities of reviewers for specific proposals should remain confidential.
- Different review panels for the two halves of the program and for different types of proposals should be seriously considered.
- All reviewers must abide by clear and fair conflict of interest rules (*more on this below*).
- Create clear, well-articulated ranking criteria. In ranking applications, reviewers conduct both a relevancy review and a multi-faceted merit review (*more on this below*). The relevancy review should examine the strength of the project in relationship to the goals of FMLFPP and demonstrable focus on farmers and farm income, while the merit review should examine the soundness and sustainability of the project and the capacity of the applicant in carrying out the project successfully. Both parts of the review are critical and neither should be left out.
- Provide clear instructions and training (perhaps via webinar) for individual reviewers on the review process.
- Allow reviewers the opportunity for substantial and open dialogue about applications (either via phone, video chat, or in-person).
- Applicants who are not selected to receive a grant award should be provided with full reviews from the panel in order to determine how they can strengthen their proposal to resubmit in a future funding cycle.

## ***12. Evaluation Criteria***

**In addition to the relevancy review (*see above*), there should be a merit review that includes at least the following categories:**

- Technical merit and appropriateness of the design of the project;
- Achievability; likelihood of obtaining the objectives of the project;
- Expertise and track record of applicant(s);
- Demonstration of involvement of farmers and ranchers in the project;
- Adequacy of plans for participatory evaluation process, outcome-based reporting, and the communication of findings and results beyond the immediate target audience, especially to farmers and ranchers; and

- Sustainability.

### ***13. Conflict of Interest***

**The program should have clear conflict of interest rules for reviewers.** Reviewers should not be allowed to participate in the discussion or recommendation of a proposed project(s) if the member has or had a professional or business interest in, including the provision of consultancy services, the organization whose grant application is under review.

### ***14. Project Evaluation and Reporting***

A key to funding successful and sustainable projects is a robust evaluations process that is clear, consistent, easy for grantees to use, and accurately documents indicators that measure meaningful outcomes.

**Among the elements AMS should adopt are:**

- Standard indicators for measuring meaningful outcomes as determined by the aforementioned administrative council or operations committee;
- The creation of simple, easy-to-use online forms for grantees to enter and update data on standard indicators;
- Continuing to require that proposals include goals, expected outcomes, and quantitative and qualitative evaluation measurements; and
- Continuing to require regular performance reports from grantees.

As a robust evaluations process will be key to determining the success of the FMLFPP program, we urge AMS to begin work now on determining indicators and measurements. NSAC and its member organizations are ready to provide immediate assistance.

### ***15. Program Evaluation and Reporting***

**AMS should regularly evaluate and publicize the effectiveness and progress of FMLFPP using the data and information provided by grantees in their project evaluations and reports.** Under Section 10016 of the 2014 Farm Bill, USDA is required:

“to evaluate the effectiveness of existing programs in growing local and regional food systems, including the level of participation in the Farmers’ Market and Local Food Promotion Program, including the percentage of projects funded in comparison to applicants and the types of eligible entities receiving funds;”

We urge USDA to fulfill the output-based component of this directive on an ongoing basis. This publicized information should include project synopses and award levels for current and past grantees. This will help prospective applicants understand the types of projects and organizations that receive funding and help USDA track the progress of FMLFPP, among other benefits.



With respect to the more outcome-based components of measuring overall program effectiveness in growing local and regional food systems, we recommend that the program itself take on a regular, outcome-based evaluation process, and, in addition, on a five year basis use program funds to engage an outside evaluation of the program.

#### ***16. Limitations on Use of Funds***

**Proposals solely for the purchase of equipment should be prohibited.** Under the 2014 Farm Bill, while the purchase, construction or rehabilitation of buildings or structures is prohibited, the purchase of equipment or other durable materials is not specifically excluded. However, proposals that are simply requests to buy equipment should not be allowed unless the equipment is integral to expected outcomes and makes up a part of, rather than the entire, proposal. The same should hold true for any funding pursuant to the Conference Managers language that suggests an allowance for funding of “cold storage or equipment including mobile processing units or shelf stable packing activities.”

### **Farmer to Consumer Direct Marketing Recommendations**

#### ***17. EBT Equipment and Installation***

**AMS and FNS should collaborate to assist farmers markets and other direct-to-consumer marketing outlets with acquiring free EBT equipment and installation assistance.** It is very important that USDA provide for a smooth transition, as envisioned by the new farm bill, from the FMLFPP providing EBT assistance to that assistance being provided directly by FNS. We urge the agency to work closely with FNS to ensure this transition goes well.

Section 4002 of the Farm Bill states that farmers markets and other direct-to-consumer markets may be exempt from having to pay 100 percent of the costs of EBT equipment and implementation. USDA should develop and implement a strategic plan to ensure that all direct-to-consumer markets that want to participate can obtain and install EBT equipment without charge.

As provided by the new farm bill, this should include not just farmers markets, but all direct-to-consumer markets receive free EBT equipment, and should include free implementation assistance, not just equipment purchases.

Currently, FNS is co-administering, with a third-party consultant, \$4 million worth of free EBT equipment to eligible farmers and farmers markets, but not to other direct-to-consumer outlets like CSAs. The \$4 million is also only available for equipment purchases and not implementation assistance.

Finally, USDA should also clarify that in order for a farmers market to be eligible to apply for EBT equipment, the market would not have to be a first-time recipient of SNAP authorization. Under the current rules for eligibility for the current \$4 million for EBT equipment, farmers markets that had previously been authorized to accept SNAP benefits cannot apply. This distinction unfairly excludes those markets that at one point had been authorized for SNAP

purchases but has since been unable to purchase EBT equipment, as well as those markets using antiquated machines, or paper vouchers.

**AMS and FNS also should form a task force to address regulatory and implementation issues related to EBT.** In addition to EBT for SNAP, FNS is also investing in the Management Information Systems for WIC EBT. The prior experience for farmers markets with SNAP EBT rollout suggests that shifting programs to a digital technology can greatly impact direct-to-consumer marketing farmers, though reduced sales, and confusion of nutrition program beneficiaries. Issues of dual-use EBT readers (for WIC and SNAP) and the use of the current Cash Value Voucher for WIC are two such issues that will need to be addressed. Also, AMS should work with FNS on ensuring that direct-to-consumer marketers have access to the state SNAP, and future WIC agency, EBT provider services established in the state agency's card service provider contracts. Establishing an AMS-FNS taskforce would provide a forum to raise and identify issues such as these and bring in perspectives from the field that often have greater knowledge on how these issues affect agricultural producers and farmers markets.

### ***18. Matching Funds***

**Although no match is required for direct-to-consumer marketing applicants, additional ranking points should be provided for those applicants who provide a match.** Proposals with matching funds are likely be more sustainable than projects without matching funds. Encouraging matching funds also increases the likelihood of partnerships with other organizations or state and local governments. Both in-kind and cash matches should be accepted for this purpose.

## **Local and Regional Food Business Enterprises Recommendations**

### ***19. Definition of “Locally and Regionally Produced Agricultural Food Product”***

**AMS should adopt the standard definition of “locally or regionally produced agricultural food product” that exists in the 2008 Farm Bill.** In Section 6015 of the 2008 Farm Bill, “locally or regionally produced agricultural food product” is defined as an “agricultural food product that is raised, produced, and distributed in the locality or region in which the final product is marketed so that the total distance that the product is transported is less than 400 miles from the origin of the product; or the State in which the product is produced”.

By adopting this widely recognized definition, AMS would minimize confusion on the part of applicants, reviewers, and USDA program staff.

### ***20. Eligible Uses***

**AMS should consider innovative uses of capital as eligible uses for program support.** To “develop new market opportunities for farm and ranch operations serving local markets, by developing, improving, expanding, and providing outreach, training, and technical assistance to, or assisting in the development, improvement and expansion of” local and regional food businesses implies a wide variety of business services. Local and regional food enterprises have a wide range of needs for assistance. Acquiring and using capital is nearly always a need of local

and regional food enterprises, and could, in some instances, be considered as eligible uses of program assistance. Innovative uses of capital might include forming a cooperative and helping to purchase shares, or starting a revolving loan fund for local and regional food businesses, or having a food hub or a community kitchen or packaging facility run a small micro-loan fund for new business start-ups. Such activities could be supported as assisting in the development and the expansion of local and regional food businesses. It would be helpful if the program were as clear as possible at the outset if these types or other types of projects would be eligible.

## ***21. Matching Requirement***

**To avoid unnecessarily burdening applicants, especially smaller organizations and those working with underserved communities, with a match requirement that is difficult to meet, AMS should qualify the match to equal 25 percent of funds provided by the grant.** The Farm Bill requires a 25 percent match of the total cost of the project in cash or in-kind donations. The Beginning Farmer and Rancher Development Program (BFRDP) has a similar provision, and NIFA requires a 25 percent match of the funds provided by the grant, as opposed to total project costs in cases where the total project may be larger than the portion of the project funded by the grant. This important clarification will satisfy the requirements of the statute while allowing better, fairer access to the program by smaller organizations or producer networks. NIFA also allows for some indirect costs to be counted, which also might be a good policy to apply to FMLFPP.

In addition, in-kind match should include not just third party in-kind match but also include time spent on eligible project tasks by the applicant provided there is an adequate explanation of the basis for the valuation of those services and provided further that final decisions on valuation remain with the Agency. This would parallel the process used in by RBCS for the Value-Added Producer Grant Program.

## ***22. Integration with Other USDA Grant and Loan Programs for Local and Regional Food Systems***

**To avoid duplicative efforts, the program should not fund projects that are better suited for Farm to School and Value-Added Producer Grant funding.** Farm to School eligible projects may not in general be very difficult to distinguish from FMLFPP. It may suffice to simply provide in the RFA a description of the Farm to School grant program, with a statement directing potential applicants to that program if the project they have in mind is better suited for that program. While there will hopefully be FMLFPP projects that serve the farm to school market, a project that is perfectly qualified as a Farm to School grant should apply there.

For VAPG, in some cases there may be a bit more of a gray area. Again, however, a box or sidebar within the RFA with a brief description of VAPG may help potential applicants find the right program for what they are trying to do.

Establishing an eligibility-determination process and webpage could help potential applicants identify which program or programs may be best suited for their projects. This may not be a task for FMLPP but rather a broader project for the Department to consider across a range of programs that provide loans or grants that impact local and regional food systems.

**AMS should inform and raise awareness among potential applicants of the full range of USDA grant and loan programs that can assist their projects.** AMS should coordinate with other AMS programs and with Rural Development and other USDA offices to broadcast and raise the awareness of potential applicants to the full range of USDA grant and loan programs available. Programs such as the Local and Regional Food Enterprise portion of the Business and Industry Guaranteed Loan Program, the new Rural Business Development Grant Program, Rural Cooperative Development Grant, Value-Added Producer Grant Program, Community Facilities Loan Program, Specialty Crop Block Grant, Federal State Marketing Improvement Program, and Community Food Grants could complement grants awarded to applicants through FMLFPP. Cross posting announcements on USDA program pages, general webinars on available USDA grant and loan programs for local and regional food projects, and training and outreach materials for USDA staff on the spectrum of available grant and loan programs to share with potential applicants are all steps AMS (and its counterpart USDA offices such as RBCS and NIFA) should take.

## **Administration of Program**

### ***23. Allocation/Use of Administrative Expenses***

We fought hard for the administrative expense provision in the new farm bill and hope it allows the program to be well run and effectively managed. We do not know enough at this point to make any specific recommendations with respect to the allocation, but look forward to working with the Agency over time to ensure success.

### ***24. Program Outreach***

We hope that AMS will continue to interact with stakeholders on the identification of outreach needs and opportunities. In the past, AMS staff has attended conferences, conducted trainings, provided materials (print and online), and conducted webinars about their programs. As some of the potential applicants to the new local and regional food portion of the program likely include both traditional and non-traditional USDA stakeholders, we encourage AMS to be creative in identifying outreach opportunities for local and regional food oriented social enterprises.

We also look forward to interaction over the coming few years as the expanded program takes a prominent place in USDA efforts to improve the infrastructure and marketing opportunities for local and regional food. NSAC and its partners will do its share of program outreach and interpretation once things are ready to go.