



July 22, 2016

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1400 Independence Avenue SW
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**Re: NSAC Comments on Beginning Farmer and Rancher Development Program FY16
Request for Applications**

Submitted via Email to: bfrdp@nifa.usda.gov

The National Sustainable Agriculture Coalition (NSAC) welcomes the opportunity to submit comments in response to the Request for Applications (RFA) for Fiscal Year 2016 for the Beginning Farmer and Rancher Development Program (BFRDP).

The National Sustainable Agriculture Coalition is a national alliance of 45 family farm, food, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture. NSAC has worked on beginning farmer issues for the past twenty-five years, and has been instrumental in developing and advocating for important resources and new initiatives for new farmers including championing the development and funding for the Beginning Farmer and Rancher Development Program.

We have valued our close partnership with NIFA over the years, and appreciate the consideration and open dialogue regarding ways to ensure BFRDP, and other competitive grants programs serving new, small, and diversified farmers, are reflecting the needs of farmers on the ground.

On the whole, we believe that BFRDP is an excellently managed and invaluable program that provides critical resources to both well-established and emerging organizations whose missions include supporting and training the next generation of farmers. We sincerely appreciate the opportunity to provide input on how to further improve BFRDP in future years.

Included below are detailed recommendations to inform next year's RFA that have been developed with input from NSAC Member Organizations¹ who work directly on the ground with beginning farmers across the country and who have either received or applied for funding through BFRDP.

RECOMMENDATIONS

1. Retain priority on partnerships with community-based organizations (CBOs) and non-governmental organizations (NGOs).

Although 2016 awards have not yet been publically announced, the number of grants involving partnerships in 2015, although higher than 2014, were still lower than the historical norm. Partnerships and collaborations are a core component of BFRDP, and for the second year in a row, multiple projects funded in 2015 that were led by universities *reported no partnerships*. That is unusual in the context of previous program trends in which all university-led projects reported at least one partnership.

We appreciate the inclusion of stronger language in the FY16 RFA *requiring* projects to include a partnership with CBOs, NGOs, and other entities in order to be eligible for consideration for funding. We hope that this language results in all FY16 awards involving substantial partnerships with NGOs and CBOs. This language should be retained and further highlighted in future RFAs.

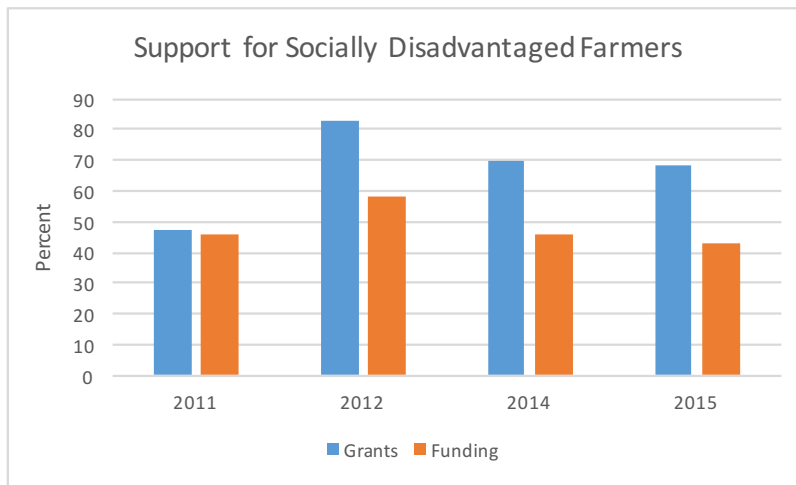
We were also glad to see that the majority of FY15 grants and funding were awarded to projects led by CBOs and NGOs. After 2014, a year in which the majority of funding went to projects led by academic institutions, we are pleased to see the program's funding trends returns to historical trends of awarding the majority of funding to CBO/NGO led projects.

In future funding rounds, we urge NIFA to continue to award a majority of overall grants and total funding to projects led by CBOs/NGOs. Since the second year of funding, BFRDP has consistently awarded 60 to 65 percent of grants to projects led by CBO/NGOs, which we believe is keeping with the statutory intent to give priority to projects led by these valuable partners.

2. Strengthen emphasis and increase funding to projects that serve socially disadvantaged, limited resource, and immigrant farmers and farmworkers.

Historically, a significant portion of BFRDP grants have focused on the needs of socially disadvantaged farmers, and has far exceeded the minimum funding requirement outlined in statute.

For instance, 43 percent of overall funding in FY15 supported projects serving this underserved farming population in some fashion, well above the 5 percent set-aside included in the Farm Bill. While the number of projects serving these communities has decreased in the last two years, from 58 percent in 2012 and then 46 percent in 2014 (see chart on next page), the overall emphasis is commendable, though should not continue to fall. We also note that while projects serving these farmers still make up a large percentage of total awards, funding dedicated to these projects is trending down, so that too bears watching. We would urge NIFA to maintain the emphasis in the RFA and strengthen pertinent instructions in the peer review process.



BFRDP is particularly valuable in communities that have not been historically well served by existing agricultural education infrastructure. That BFRDP invests directly in community-based support for beginning farmers is especially important when it comes to projects that serve socially disadvantaged farmers and ranchers. Organizations based in the communities they serve know best what barriers farmers in their communities face, and can most effectively provide in-person, culturally appropriate and ongoing support that leads to the success of beginning farmers.

To qualify for the targeted set-asides, past Requests for Applications (RFA) have called for “evidence of the ability to serve the needs of the intended audience, e.g. a strong track record of having previously done so.” Future RFAs would benefit from specifying the kind of “evidence” applicants should provide. For instance, that members of the community served are in leadership roles—e.g., represented on the board or staff of the organization, or in other decision-making positions for the projects that impact their communities.

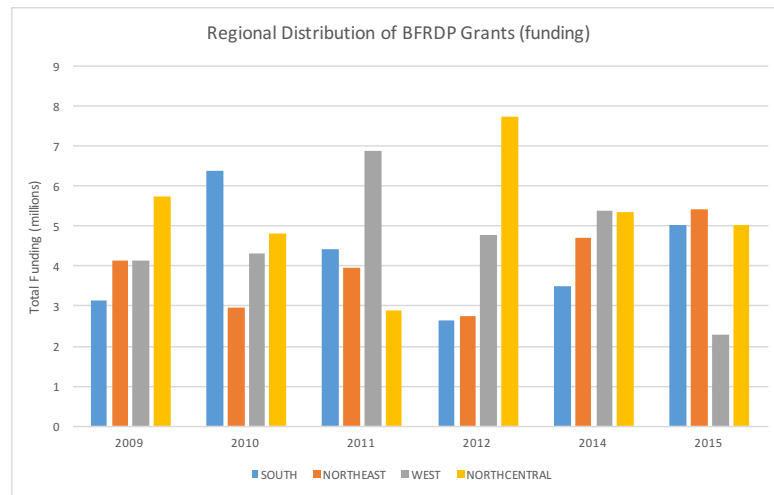
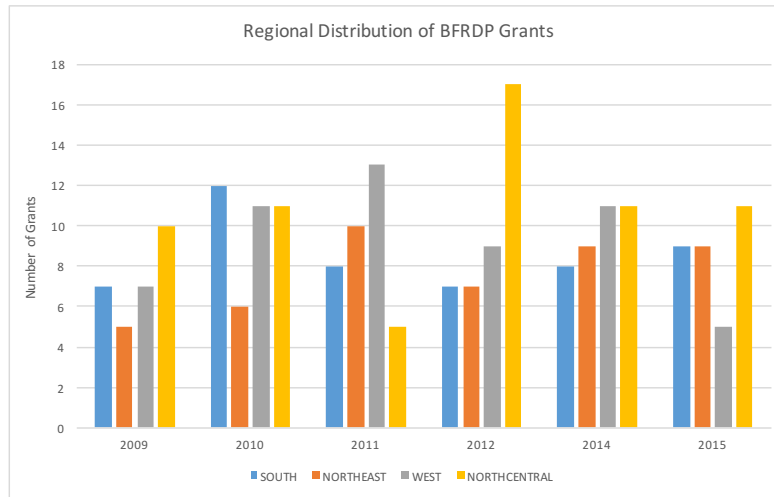
3. Ensure regional balance in number of awards, total funding, and distribution between non-profit and academic led projects.

Ensuring that the benefits of BFRDP reach new and aspiring farmers in every state across the country is a core objective of the program – which remains the only federal program specifically focused on training the next generation of farmers. This goal is outlined in statute, and has generally been implemented successfully over the course of the program’s short history.

While total funding and total grants are spread pretty evenly across all regions when considering all grants funded since the program’s inception, there have been some regional disparities and outliers in specific funding cycles. For example, in FY15, the regional distribution of grants was balanced across all regions except for the West, which received significantly fewer projects and less funding than other regions (see table below).

Region	Total Grants	Total Funding	% of Grants	% of Funding
South	9	\$5,035,355	27%	28%
Northeast	9	\$5,418,993	27%	31%
West	5	\$2,278,559	15%	13%
North Central	11	\$5,024,267	32%	28%

And in 2012, a disproportionate amount of funding and awards went to the North Central region. Likewise the West saw significant gains in total program support in 2011, and the South fared exceptionally well in 2010 (see charts below).



Over the six year program history, the North Central region has received both the most number of awards (30 percent) and the greatest funding (29 percent). Conversely, the Northeast region has received the fewest awards (21 percent) and the least funding (22 percent). In general, we believe the program has done an excellent job in obtaining regional equity. Where possible, however, we would urge NIFA to more closely ensure that annual awards are as evenly distributed as possible within the context of fair and open competition.

Particular attention should also be paid to the distribution of award type by region. In all regions except the South, the majority of funded projects in FY15 were awarded to projects led by CBOs and NGOs, following the annual funding trend in the previous year. However, a significant larger percentage of projects led by academic institutions were funded in the Southern region. While this may be explained in part by the greater number of CBOs and NGOs working with new farmers in other regions, this regional disparity is concerning nonetheless. There are several well-established NGOs and CBOs, both within our membership and among our partner organizations, that have a long track record of working with farmers on the ground, especially with socially disadvantaged producers in the South.

We have heard from several of our partner organizations who work directly with these underserved communities whose proposals were not successful in FY15, and who were very disappointed to see so few NGO and CBO-led projects in the South. This trend is especially concerning when combined with the decreasing trend in the number of projects funded overall that serve socially disadvantaged farmers in recent years.

While NIFA cannot control the results of the peer review process, nor the types of applications received, we urge program leaders to continue to conduct targeted outreach and provide targeted assistance to CBOs and NGOs in the South to increase the quality and number of proposals submitted in future funding rounds. Additionally, NIFA should actively work with university partners in the south to ensure they are reaching out to and partnering with CBOs and NGOs in their region.

4. Continue to improve application process and provide targeted assistance to first-time and less-experienced applicants.

Similar to previous years, grantees—especially CBO/NGOs—say they find applying for BFRDP grants time-consuming and difficult. Those who applied in previous cycles often say they appreciate NIFA’s efforts to make the application process more approachable, but still find it difficult and expensive to submit an application.

We therefore urge NIFA to continue to offer support to first-time and less-experienced applicants. The application process continues to be time-consuming and challenging for community-based organizations, who often have less resources to devote to grant-writing than higher-capacity universities and colleges that have a dedicated grants support staff. Existing resources, like webinars, technical assistance, targeted outreach, and support through EET grants that seek to assist lower resource organizations in developing competitive proposals are appreciated. NIFA has done a good job of listening to and helping applicants work through the challenges—and ongoing support will continue to be critical for applicants, whether the support is given by the agency directly and/or by external organizations.

5. Plan the release of future Requests for Applications to coordinate with the end of the busy growing season either in the late fall or early winter.

We appreciate that the 2016 RFA was issued in the late fall and allowed a three month application window for applicants to prepare their grant applications. This application window gives organizations, especially limited resource and lower capacity non-profit and community based organizations additional time to prepare necessary materials, better coordinate with partners, and secure the necessary matching funds. This timing also coordinates with the end of the growing season when many organizations have more staff time and resources to devote to grant-writing, rather than being out in the field working with farmers.

With farm bill funding now in place for the next several years, we urge NIFA to adhere to this consistent program schedule by releasing the RFA in the late fall or early winter, allowing a 60 day minimum application period, coordinating the peer review panel for late winter or early spring when farmers are most likely to be able to participate, and obligating the funding by the end of each Fiscal Year, or earlier if possible. This program schedule would allow maximum participation from

community-based and farmer driven non-profit organizations – which are an important and targeted component of the program.

This consistency in timing is extremely helpful to organizations and the farmers they work with to expect and plan for the significant demands of time and staff resources needed to complete the program application or to serve on the peer review panel.

6. Continue to staff the peer review panels with at least two-thirds representatives of CBO/NGOs and farmers.

Panelists bring their own experience, and limitations, to the peer review process. Continuing the practice of staffing the panels with at least one-third representatives of CBO/NGOs and one-third farmers is critical in a program that seeks to give priority to funding community-based initiatives.

The selection of strong panel managers, with on-the-ground experience is also crucial, and should rotate between an NGO/CBO and university panel manager every other year. Additionally, adequate training for panelists of all backgrounds is important, as they weigh the merits of projects that seek to serve farmers across the country with diverse backgrounds, skills, geographic settings, and production goals and methods.

Finally, we would discourage any significant changes to the peer review process that would place an additional burden on applicants – particularly non-profit and community-based organizations. For example, some programs administered through the Agriculture Food and Research Initiative are piloting a new modified peer review process that would require applicants to also serve as peer reviewers. If applied to programs such as BFRDP, which has made progress in tailoring program administration to meet the needs of non-academic institutions, the result would likely be fewer applications from lower resource non-profit and community-based organizations who may very well be less likely to commit to additional time serving as a reviewer than their academic counterparts.

SUMMARY

In closing, NSAC and our member groups within the beginning farmer community are excited that the Beginning Farmer and Rancher Development Program continues to generate increased interest nationwide, and believe it provides a critical and source of funding urgently needed to train the next generation of farmers.

On the whole, the Request for Applications for Fiscal Year 2016 aligns well with the priorities and requirements outlined in the 2014 Farm Bill and is on par with previous RFAs. With the recommendations provided above, it is our hope that future RFAs will continue to best serve those organizations who have made it their mission to work on the ground with new farmers in their communities, and are skillfully able to provide them the training they need to succeed.

On behalf of NSAC's 45 farmer-based member organizations, we thank you for serious consideration of our recommendations, and would welcome any additional feedback we can provide.

Sincerely,



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National Sustainable Agriculture Coalition

ⁱ **Represented NSAC Members:** Agriculture and Land-Based Training Association Salinas, CA; Alternative Energy Resources Organization Helena, MT; CCOF Santa Cruz, CA; California FarmLink Santa Cruz, CA; C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture) Hereford, TX; Catholic Rural Life St Paul, MN; 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; 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; Interfaith Sustainable Food Collaborative Sebastopol, CA; Iowa Natural Heritage Foundation Des Moines, IA; Izaak Walton League of America St. Paul, MN/Gaithersburg, MD; Kansas Rural Center Topeka, KS; The Kerr Center for Sustainable Agriculture Poteau, OK; Land Stewardship Project Minneapolis, MN; MAFO St Cloud, 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; Montana Organic Association Eureka, MT; The National Center for Appropriate Technology Butte, MT; National Hmong American Farmers Fresno, CA; Nebraska Sustainable Agriculture Society Cresco, 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; Oregon Tilth Corvallis, OR; Organic Farming Research Foundation Santa Cruz, CA; Powder River Basin Resource Council Sheridan, WY; 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; Women, Food, and Agriculture Network Ames, IA; World Farmers Lancaster, MA