



August 16, 2018

Diane Cullo
Director, Office of Partnerships & Public Engagement
U.S. Department of Agriculture
1400 Independence Ave SW, Room 510-A
Washington, DC 20250-0121

Re: NSAC Comments on 2501 FY18 Funding Opportunity Announcement

In response to the Fiscal Year (FY) 2018 Funding Opportunity Announcement (FOA) for the Outreach and Assistance for Socially Disadvantaged Farmers and Ranchers and Veteran Farmers and Ranchers Program (“2501 Program”), the National Sustainable Agriculture Coalition (NSAC) would like to take the opportunity to submit the following recommendations for consideration in developing future FOAs and improving the administration of the grant program.

NSAC is a national grassroots alliance that directly represents forty-seven¹ family farm, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture – including policies and programs related to underserved farmers. Our members represent and work on the ground with a diversity of farmers and ranchers, including farmers of color, tribal, veteran, women, urban, and Limited-English proficiency producers, as well as immigrants, refugees, and farmworkers.

As such, the 2501 Program is a valuable resource for our members in providing critical outreach and assistance to these farming populations and NSAC has been supportive of the program since its creation nearly 30 years ago. Additionally, NSAC was instrumental in pushing for the establishment of the Office of Advocacy and Outreach in the 2008 Farm Bill in order to elevate the needs of these farmers within the Department, and are currently working with our allies to defend mandatory funding and create permanent baseline funding for the 2501 Program in the 2018 Farm Bill.

We have valued our close partnership with the leadership overseeing 2501 over the years, and appreciate the consideration and open dialogue regarding ways to ensure the program reflects the needs of farmers on the ground, as well as the grassroots community-based organizations that work most closely with them, while at the same time holds the program accountable and transparent to its stakeholders and policymakers.

Our general recommendations on the 2501 Program have been developed with input from NSAC member organizations who work directly on the ground with underserved farmers across the country and who have either received or applied for grant funding through 2501.

RECOMMENDATIONS:

1. Increase project length and increase total grant award proportionally.

The current project length of twelve months allowed for 2501 project proposals is not sufficient to allow grantees to design the most impactful, outcome-oriented, and effective projects. It is nearly impossible to track, document, and report on substantial project outcomes, let alone longer-term impacts of grant funding, for the communities served by single year projects that must be renewed and recompleted each and every year in order to continue.

Due to the current twelve-month restriction on grant funding, project directors are required to reapply for subsequent grant funding halfway through their current grant, which means they not only have limited outcome data to make a case for project renewals, but are also stuck in an annual, and often time-consuming, grant writing exercise every single year in order to ensure program continuity.

For smaller organizations with lower grant-writing capacity, the short project length also means that undue administrative labor is put into the reapplication process, and also makes it difficult for new projects to flourish – given the significant annual time commitment and staff resources needed to apply and manage grant funding each year. Solidifying communication with partner organizations and USDA administrative processes often take up a large portion of the first three months of new projects, which in a twelve-month cycle is already one quarter of the total grant timeline. This leaves new grantees with less time to actually engage in project activities that provide dire services to underserved farming communities, and also to track outcome data.

Project length and total grant funding must, however, go hand in hand. The current grant award for a single year grant is \$200,000 and should therefore be adjusted with any changes to maximum allowed project period. We would recommend project periods of at least two to three years, for a total award amount of \$400,000 to \$600,000.

2. Streamline application, award, and reporting processes.

Grantees who apply for multiple USDA grants are currently required to fill out many of the same forms in each application process. While this concern goes well beyond the 2501 program, the Office of Partnerships and Public Engagement is in an ideal position to undertake a process to coordinate grant programs across USDA agencies to ensure, to the extent possible, the application process is streamlined and an efficient use of taxpayer resources. With nearly all USDA grants processed through the Grants.gov portal, OPPE should initiate steps to allow current or previous applicants to update information or forms already submitted through Grants.gov.

Additionally, to the extent possible, OPPE should extend the grant application window to at least 90 days. The grant application process is a time-consuming process that stretches the capacity of many limited-resource, community-based organizations who are interested in applying for the 2501 Program. In the two most recent funding cycles for the 2501 Program, grant applicants were given sixty (60) days from the time the FOA was announced to when completed applications and all supporting materials were due. Given that it is advised that grant applicants allow at least two (2) weeks to submit their applications in through the online Grants.gov portal, this application window requires applicants to develop and complete all required application materials in just six weeks.

While this turn around time may be barely doable for most academic institutions who have an internal grant-application support staff, many of the non-profit and community-based organizations groups that are eligible to receive funding from the 2501 Program have very limited staff capacity to devote to completing and submitting grant applications in such a short time frame.

If it is truly the intent of the 2501 Program to target funding to community and non-profit organizations who work with socially disadvantaged farmers, as is outlined in statute, then NSAC and the community-based organizations that we represent, strongly urge OPPE to ensure at least a ninety day application period in future funding cycles.

Additionally, we would urge OAO to publish the FOA during the winter or early spring at the latest, in order to take advantage of the time of year when most farmer-based organizations are not busy with programming that is designed around the growing season. We would also urge USDA to coordinate the release of the 2501 Program FOA with other federal competitive grant programs administered by other agencies ¹ to minimize the extent to which limited capacity organizations are required to develop and submit multiple grant applications concurrently.

Further, we recommend that USDA provide more clarity and assistance to grantees on reporting metrics for their program outcomes from the beginning of the application and grant award period. Quarterly reporting, followed by a cumulative final report is burdensome and redundant for awardees, especially for a single year grant. If the project term remains at one year, we urge USDA to require only a final end of year report for grantees. However, if the maximum project period were extended, we would recommend annual reports in addition to a cumulative report, similar to other competitive grant programs.

3. Provide better networking opportunities for Project Directors by improving Project Directors' meetings and USDA webinars.

While we support continuing to convene grantees for an annual Project Directors' meeting, there are significant improvements that could be made to create more of an opportunity for awardees to connect and share ideas and stories, foster collaboration and networking, and facilitate dissemination of best practices in terms of effective methods for reaching targeted communities.

We urge USDA to provide sufficient advance notice of at least six months to ensure that grantees are able to make affordable and appropriate travel accommodations. Additionally, grantees should be required to attend and able to use project funding to cover their travel costs, similar to how other competitive grant programs within USDA operate.

Additionally, further improvements should be made to the actual content and structure of the Project Directors' meeting in order to ensure that the experience is an effective use of grantee and USDA resources. Some who participated in the live-stream option for previous Project Directors' meetings noted significant technical difficulties that made it difficult for them to be truly engaged in the discussion. However, grantees who did attend in person noted that much of the meeting was spent introducing different agencies to grantees (who are most often already familiar with USDA

¹ Including the Beginning Farmer and Rancher Development Program (NIFA), Community Food Projects (NIFA), and the Risk Management Partnership Program (RMA).

programs and agencies) rather than encouraging dialogue and interaction between Project Directors. Future Project Directors' meetings should be structured around grantee projects, facilitate sharing of best practices, and allow for dialogue around challenges or other barriers to effectively reaching target populations.

Finally, USDA should evaluate the content presented in the applicant webinars and consider developing additional content for established programs or on specific topics of interest to grantees. Grantees have noted that the webinars provided by USDA while helpful to first time applicants, do not contribute much additional information for subsequent grantees. One possible alternative or complement to the standard introductory, first-time applicant webinar is to use that space as an interactive networking tool so that returning awardees are also able to find value in the time spent on the webinar.

4. Increase transparency and accountability in the awards process by transitioning to an external peer review and public reporting on project outcomes.

The 2501 program is a longstanding resource for our nation's most underserved farmers – including farmers of color, tribal producers, immigrants, farmworkers, and veterans. However, there has been little transparency or stakeholder input in the administration of 2501 through the Office of Advocacy and Outreach (OAO). Recent changes within USDA have elevated OAO, now OPPE, to report directly to the Secretary in order to create more transparency and accountability, facilitate oversight and stakeholder input, and provide a more coordinated, streamlined, and ultimately more effective approach to outreach across USDA.

With the establishment of the Office of Partnerships and Public Engagement and the transition of 2501 administration into this new office, we urge USDA to take advantage of this new management structure to implement a fully transparent, external peer review process to evaluate which submitted proposals are ultimately funded, in line with other federally administered competitive grant programs.

Under the current evaluation process, USDA personnel alone are responsible for conducting an internal “peer review” in which grant proposals are evaluated and ranked by USDA staff, rather than the stakeholders and ultimate beneficiaries of the program. This process not only lacks transparency and accountability, but is also unlike most other federal competitive grant program, such as those administered by NIFA. NIFA requires that peer review panels be comprised of almost entirely external reviewers, who are responsible for evaluating the merit and relevancy of each proposal and make funding recommendations to the agency.

The internal process that OAO has instituted not only lacks transparency, but also excludes community-based organizations and veteran and minority farmers themselves, who are perhaps best positioned to evaluate both the need and value of proposed projects in reaching these underserved audiences, from serving on the peer review panel.

Additionally, project outcome data is very difficult to impossible to obtain on 2501 grantees, and is currently not made available to the public in the same manner that project outcomes are for other competitive grant programs. NIFA grants, for example, require all federal grantees to report project outcomes through the REEport database, which are then searchable by the public and other stakeholders through the Current Research Information System (CRIS). Similarly, the Risk

Management Agency utilizes the Results Verification System (RVS) reporting portal to obtain progress report and project outcomes from its grantees.

It is imperative that USDA be able to demonstrate the impact of the 2501 program and makes project outcomes publicly available and accessible to policymakers and taxpayers alike. With the establishment of OPPE, USDA should seize this opportunity to make the long overdue change and require the 2501 program to be held to the same strict standards and protocols that govern other USDA competitive grant programs.

We thank you for serious consideration of our recommendations, and would welcome any additional feedback we can provide.

Sincerely,



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ⁱ NSAC's represented member organizations are the: Agriculture and Land Based Training Association; Alternative Energy Resources Organization; California Certified Organic Farmers; California FarmLink; C.A.S.A. del Llano (Communities Assuring a Sustainable Agriculture); Catholic Rural Life; Center for Rural Affairs; Claggett Farm/Chesapeake Bay Foundation; Community Alliance with Family Farmers; Dakota Rural Action; Delta Land and Community, Inc.; Ecological Farming Association; Farmer-Veteran Coalition; Florida Organic Growers; FoodCorps; GrassWorks; Hmong National Development; Illinois Stewardship Alliance; Institute for Agriculture and Trade Policy; Interfaith Sustainable Food Collaborative; Iowa Natural Heritage Foundation; Izaak Walton League of America; Kansas Rural Center; Kerr Center for Sustainable Agriculture; Land Stewardship Project; MAFO; Michael Fields Agricultural Institute; Michigan Food and Farming Systems; Michigan Organic Food and Farm Alliance; Midwest Organic and Sustainable Education Service; Montana Organic Association; National Center for Appropriate Technology; National Hmong American Farmers; Nebraska Sustainable Agriculture Society; Northeast Organic Dairy Producers Alliance; Northern Plains Sustainable Agriculture Society; Northwest Center for Alternatives to Pesticides; Ohio Ecological Food and Farm Association; Oregon Tilth; Organic Farming Research Foundation; Organic Seed Alliance; Rural Advancement Foundation International – USA; Union of Concerned Scientists Food and Environment Program; Virginia Association for Biological Farming; Wild Farm Alliance; Women, Food, and Agriculture Network; and World Farmers.