



July 17, 2017

Wesley Dean, National Program Leader  
USDA National Institute of Food and Agriculture  
Waterfront Building, Room 3109  
Washington, DC 20250–2240

**Re: NSAC Comments on BFRDP FY17 Request for Applications**

The National Sustainable Agriculture Coalition (NSAC) welcomes the opportunity to submit comments in response to the Request for Applications (RFA) for Fiscal Year 2017 for the Beginning Farmer and Rancher Development Program (BFRDP).

NSAC is a national alliance of 47 family farm, food, rural, and conservation organizations that together take common positions on federal agriculture and food policies to advance sustainable agriculture. Beginning farmers have been a core piece of NSAC’s policy work for the past thirty years, and remains a top priority for our members today. Over the past several decades, NSAC has been instrumental in developing and advocating for important resources and new initiatives for new farmers, including championing the development and subsequent funding for BFRDP.

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 farmers and small and mid-scale diversified operations, reflect the needs of farmers on the ground, as well as the grassroots community-based organizations that work most closely with them.

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 general recommendations to inform next year’s RFA that have been developed with input from NSAC Member Organizations<sup>i</sup> who work directly on the ground with beginning farmers across the country and who have either received or applied for funding through BFRDP.

On behalf of our 47 farmer-based member organizations, we thank you for serious consideration of our recommendations, and would welcome any additional feedback we can provide.

Sincerely,

A handwritten signature in black ink that reads "Greg Fogel".

Greg Fogel, Policy Director

A handwritten signature in black ink that reads "Juli Obudzinski".

Juli Obudzinski, Deputy Policy Director

## RECOMMENDATIONS

### **1. Retain priority on partnerships with community-based organizations (CBOs) and non-governmental organizations (NGOs), and increase NIFA reporting on these partnerships.**

Community-based and non-profit organizations have played a vital role in developing innovative training programs specifically targeted to new farmers over the past decade, and we were very pleased to see a significant increase in the number of grants made in FY16 to support CBOs and NGOs. In total, 29 of the 37 projects funded by BFRDP in FY16 were led by community-based and non-profit organizations, with university and cooperative extension partners leading the remaining 8. While USDA is required by statute to prioritize funding for projects that “partner with” community-based and non-profit organizations, they have not always prioritized projects led by them. We applaud the funding priority given in FY16 to beginning farmer projects that are specifically driven by CBOs and NGOs and the farmers they serve.

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 75 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.

Partnerships and collaborations are a core component of BFRDP, and we appreciate the inclusion of stronger language in the FY17 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 FY17 awards involving substantial partnerships with NGOs and CBOs. This language should be retained and further highlighted in future RFAs.

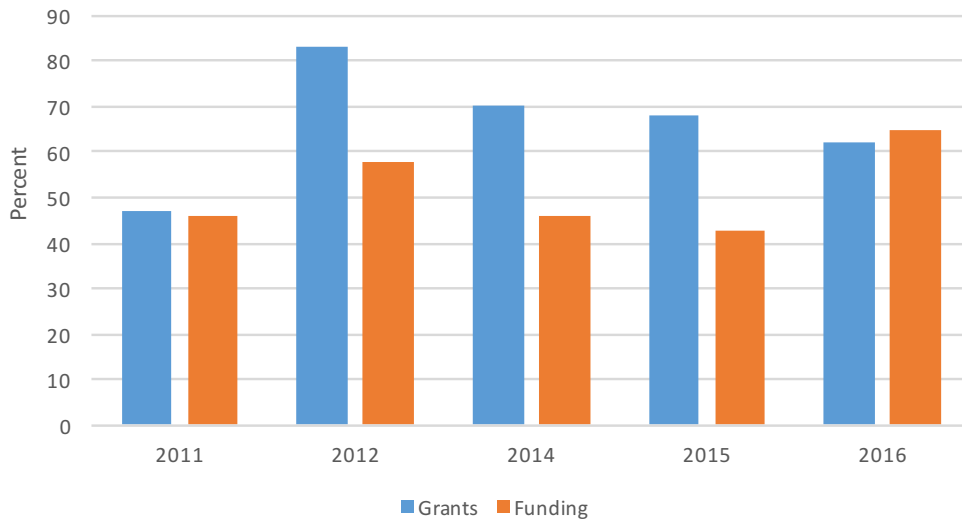
In addition, we recommend that partnerships are more consistently tracked and reported by NIFA, and information on the nature of the partnerships made available to the public through annual CRIS reports. Since most BFRDP projects involve partnerships, it is incredibly valuable for stakeholders and policymakers to understand and track the extent of organizational partners in funded projects.

### **2. Maintain emphasis and funding towards 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. We were pleased that roughly 65 percent of overall funding in FY16 (up from 43 percent in FY15) supported projects serving socially disadvantaged, limited resource, immigrant, and refugee farmers in some fashion, well above the 5 percent set-aside included in the 2014 Farm Bill.

And while the number of projects serving these communities has remained high, there has been a subtle decrease in terms of the number of projects focusing on socially disadvantaged farmers (see chart below). While the overall emphasis on serving these communities is commendable, NIFA should continue to encourage applications from organizations working with socially disadvantaged farmers. We would urge NIFA to maintain the emphasis in the RFA and strengthen pertinent instructions in the peer review process.

### BFRDP Support for Socially Disadvantaged Farmers 2011 - 2016

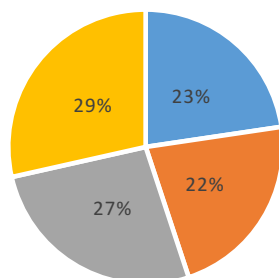


### 3. Ensure regional balance in number of annual awards, total annual funding, and distribution between non-profit and academic led projects.

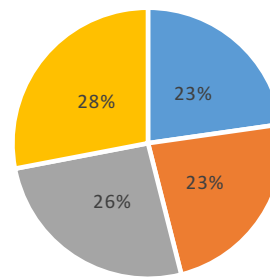
Ensuring that the benefits of BFRDP reach new and aspiring farmers in every region of the country is a core objective and statutory requirement of the program. In general, we believe the program has done an excellent job in obtaining regional equity. Where possible, however, we would urge NIFA to more closely evaluate and ensure that annual awards are as evenly distributed as possible within the context of fair and open competition.

When evaluating the total regional distribution of grants made since the program has been created, it's safe to say that the goal of regional balance has been achieved. Over the seven-year program history, the North Central region has received both the most number of awards (29 percent) and the greatest funding (28 percent). Conversely, the Southern and Northeast regions have received the fewest awards (23 and 22 percent respectively) and the least funding (23 percent each).

Total Awards  
2009 - 2016



Total BFRDP Funding  
2009 - 2016



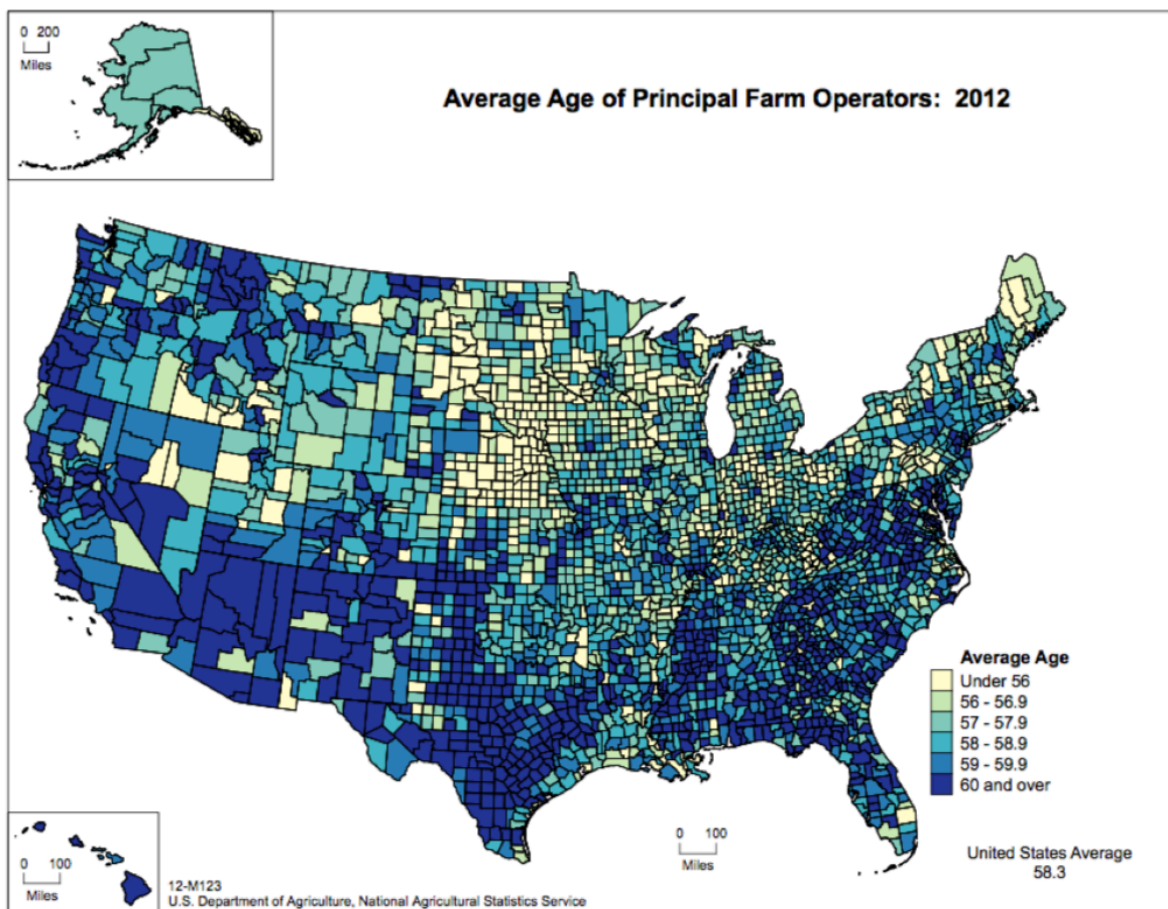
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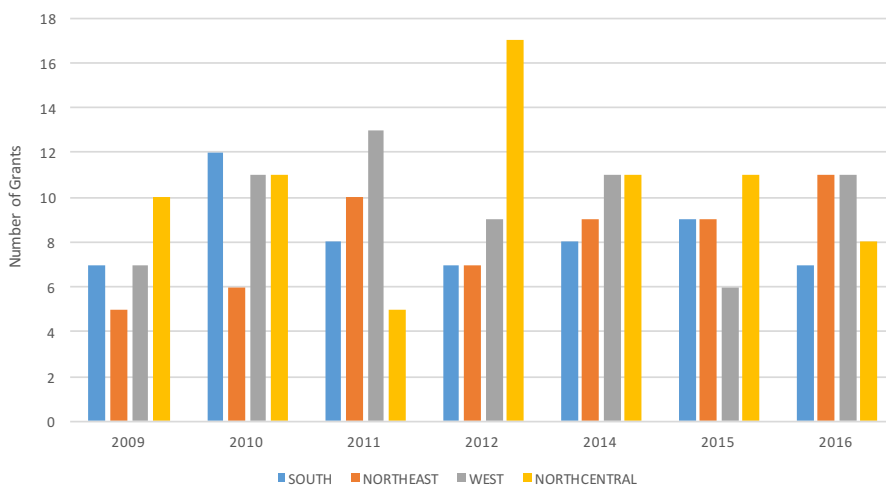
While these differences are small when averaged across the program’s history, the annual distribution trends can be significantly more skewed to favor or disadvantage one region over another – as was the case last year for the Western region and this year for the Southern region (see table below).

Region	Total Grants	Total Funding	% of Grants	% of Funding
South	7	\$3,619,074	19%	20%
Northeast	11	\$5,480,131	30%	31%
West	11	\$4,903,515	30%	28%
North Central	8	\$3,793,471	22%	21%

And while this underrepresentation of grants to the Western region in last year’s grant cycle seems to have been addressed in the FY16 round, we were disappointed to see so few grants, and so little funding directed to organizations in the Southern region – especially considering the tremendous need for resources to support and train new farmers across the South. In fact, according to the most recent Census of Agriculture, the South (along with states in the Southwest) has the highest average age of farmers nationwide – with the average age of farmers in every state in the South (except for Kentucky and Arkansas) exceeding the national average. More importantly, the South also includes some of the largest populations of socially disadvantaged and limited resource farmers who are in critical need of BFRDP resources and support.

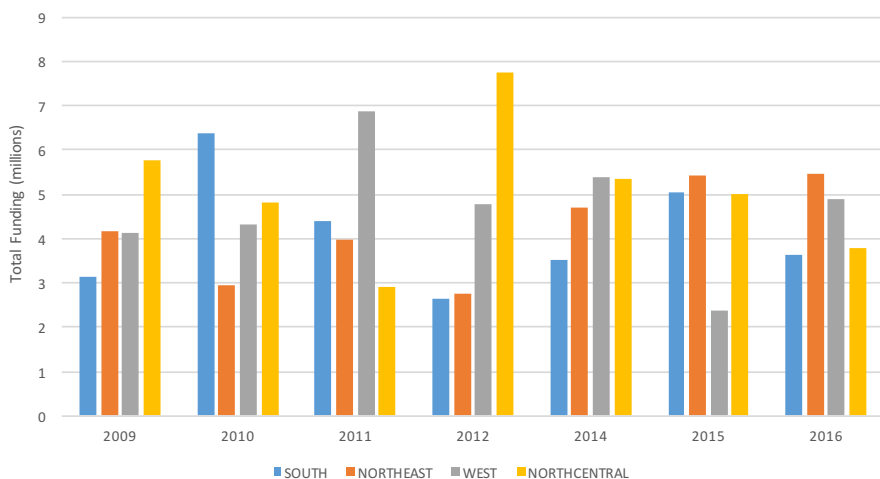


Regional Distribution of BFRDP Grants (awards)  
2009-2016



In 2016, there were just 7 out of the 37 total grants that went to institutions and NGOs working with beginning farmers in the South, representing a decrease from 27 percent of grants in FY15 to just 19 percent the following year. Similarly, the total funding to Southern projects fell from 28 to 20 percent from FY15 to FY16. In our comments last year, we pointed out the importance of paying specific attention to grant applications from the southern region, and would reiterate the same concerns this year.

Regional Distribution of BFRDP Grants (funding)  
2009-2016



Particular attention should also be paid to the distribution of award type by region. In all regions except the South, the majority of projects funded in both FY 15 and FY 16 were awarded to projects led by CBOs and NGOs, following the annual funding trend in previous years. However, FY16 continues the concerning trend that a significantly smaller percentage of projects funded in the Southern region were led by CBOs and NGOs. 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 new and beginning minority farmers in the South.

In recent years, we have heard from several of our partner organizations who work directly with these underserved communities whose proposals were not successful 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 continue to urge program leaders to continue to conduct targeted outreach and provide targeted assistance to CBOs and NGOs, particularly in the South, to increase the quality and number of proposals submitted in future funding rounds. Additionally, NIFA should actively work with university partners and Cooperative Extension in the South to ensure they are reaching out to and partnering with CBOs and NGOs in their region. For the FY18 RFA, we urge NIFA to include a specific priority or mention to encourage applications from CBOs and NGOs in the South and to work with stakeholders on the ground to better understand what challenges might be preventing Southern CBOs and NGOs from competing successfully for grant funding.

#### **4. Continue to improve the 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.

Unlike the FY16 RFA, the FY17 RFA did not offer EET grants available for technical assistance for less experienced applicants. The FY16 RFA explicitly stated that EET technical assistance grants should assist “organizations who may apply for BFRDP grants in FY 2017 and FY 2018” and therefore, another TA grant may not have been necessary for inclusion in the FY17 RFA. However, we urge NIFA to evaluate the materials and resources produced as part of the FY16 EET TA grant and to closely monitor any changes in the quantity and quality of CBO and NGO applications and success rates in subsequent years – particularly in the Southern region as aforementioned.

We would also 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. Provide clarity and assistance to limited-resource organizations and other CBOs that have difficulty meeting the match requirement.**

We have heard from many of our member organizations regarding their difficulty in meeting the 25 percent matching funds requirement. For a small grant, this translates into roughly \$75,000 and for a larger grant, up to \$150,000 in additional funds that a limited resource or lower capacity non-profit or community-based organization must raise in order to be eligible to receive a BFRDP grant. This may be one of the primary barriers that prevents CBOs and NGOs, particularly lower resourced

organizations working with farmers in the South, from competing successfully for grant funding, or even applying in the first place.

Clearly, if BFRDP is going to continue to meet its statutory obligations to maintain regional balance in the distribution of grants as well as the priority on partnerships with NGOs and CBOs, more needs to be done to address this fundamental issue. We understand that BFRDP is required by law to require 25 percent in matching funds, and hopefully, with a new Farm Bill on the horizon, Congress will be able to address this issue once and for all.

But in the meantime, we urge NIFA to explore other mechanisms that are within your authority to assist organizations that have difficulty meeting the matching funds requirement. For example, NIFA could offer a webinar on the topic, or connect less experienced and lower resourced organizations with more experienced organizations that have been successful in securing BFRDP funding and were able to meet the match requirement. Additionally, NIFA should consider providing additional resources targeted specifically toward NGOs and CBOs that explains (and gives specific examples pulled from real BFRDP projects) what items can count as match, and what is expected in terms of tracking and showing proof of matching funds.

Finally, we recommend that NIFA include specific language in the FY18 RFA to encourage larger, more established, and better resourced organizations (including academic institutions) to partner with lower resourced organizations in their areas, which may help some organizations who struggle to meet the match on their own compete for funding.

#### **ADDITIONAL RECOMMENDATIONS**

In addition to the recommendations provided above, we reiterate the following recommendations from previous years:

- **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.**
- **Continue to staff the peer review panels with at least two-thirds representatives of CBO/NGOs and farmers.**
- **Retain existing grant categories to support both large and small grant projects, and ensure a balance between the two.**

#### **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 2017 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.

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<sup>i</sup> **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; FoodCorps, OR; 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 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; Oregon Tilth Corvallis, OR; Organic Farming Research Foundation Santa Cruz, CA; Organic Seed Alliance Port Townsend, WA; 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