



October 15, 2009

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Delivered by e-mail to: RFP-OEP@nifa.usda.gov and to: SSURESHW@nifa.usda.gov

RE: Beginning Farmer and Rancher Development Program RFA.

Dear Suresh,

I am submitting these comments on behalf of the National Sustainable Agriculture Coalition (NSAC) regarding the Request for Proposals for the Beginning Farmer and Rancher Development Program. As you know, the Coalition represents family farm, conservation, rural, and urban organizations from around the U.S. that share a commitment to federal policy that promotes sustainable agriculture production systems, family-based farms and ranchers, and healthy, vibrant rural communities. We commend the NIFA staff for their ongoing efforts to collect stakeholder comments aimed at improving the Beginning Farmer and Rancher Development Program and the RFA process.

Administration of the BFRDP Program

We believe it best that the BFRDP program continue to be administered as a joint program between Competitive and Economics & Community Development, understanding that the names for each of these parts of NIFA may be different after the full-blown reorganization plan is announced. We hope that a co-program manager will be named soon. We also support continued efforts to coordinate this program with others that share one or more things in common – SARE, OREI, RME, AFRI small and medium-sized farms, SBIR, 2501, RMA outreach, etc. – in order to maximize the bang for the buck for each program individually and all of them collectively.

Role of and Function of Educational Enhancement Projects

NSAC's original recommendation to CSREES was to use the first cycle of grant applications to award one or two scoping proposals focused on gap analysis and fact gathering of existing beginning farmer and rancher curricula and stakeholders from across the country.

Because CSREES chose to fund Education Enhancement Projects instead, we encourage you to consider this first year a pilot phase and convene a group of stakeholder and Standard Project grantees to provide feedback on the first year of Educational Enhancement Projects and how the Education Team structure might be modified in the future so that they best compliment the role of Standard Projects.

To ensure that there is broad geographic representation in the collected data, we recommend that you award extra points to Educational Enhancement Project grant proposals that target regions of the U.S. not covered by the EE projects awarded in 2009.

Concerning the relationship between Standard Projects and Educational Enhancement Projects, we continue to urge NIFA to make collaboration between the two optional and encouraged but not required. NIFA should not to automatically assign Standard Projects to Educational teams.

In our opinion, it would also be more efficient if the Standard Project grantees reported their project results and curriculum directly to the Clearinghouse.

Finally, we again draw your attention to the fact that the Educational Enhancement Projects description does not encourage the Education teams to work with community-based and non-government organizations, though these groups are among the others listed in the statute. Any award of an Educational Enhancement Project must include major participation and engagement with community-based organizations, and next year's RFA should correct the oversight.

Educational Enhancement and Clearinghouse Grants

We continue to advocate that NIFA award grants based primarily on the merits of each application - following the evaluation criteria¹ -- and not be bound by set-asides for the three funding categories (Standard Projects, Environmental Enhancement Projects, and Clearinghouse).

Our understanding is that in 2009, 25 Standard Project Grants were awarded and that the average 3-year grant was \$556,000, 3 Educational Enhancement Project Grants were awarded and that the average 3-year grant was \$600,000, and 1 Clearinghouse Grant was awarded at \$1.5 million.

We applaud your decision to limit the number of Educational Enhancement grants to three and urge you to ensure no more than 3 grants are awarded in the next cycle.

We were disappointed that you did not implement our suggestion that the Clearinghouse Grant be reduced from \$300,000 a year to not more than \$250,000 a year. The BFRDP legislative language clearly limits grants to not more than \$250,000 a year. We urge NIFA to apply the statutory requirements provided by Congress for the maximum term and size of grants for all project types.

Proposals from Universities or Community Colleges working with CBOs

We urge NIFA not to fund proposals for general undergraduate courses at universities and colleges and instead only fund new farmer training and education programs at technical schools and colleges that are aimed at putting new farmers on the land and starting their own businesses. We also urge NIFA not to fund curriculum for general undergraduate education but rather focus on extension, training, and outreach programs and focused and targeted train the trainer activities. This understanding and recommendation is, we believe, the only one that is consistent with statute.

¹ The evaluation criteria provided for in statute are relevancy; technical merit; achievability; the expertise and track record of one or more applicants; adequacy of plans for the participatory evaluation process, outcome-based reporting, and communicating findings and results beyond the immediate target audience; and other appropriate factors, as determined by the Secretary.

Partnerships

For those applications where the lead grantee is not a NGO or CBO but proposes to partner with a NGO or CBO, it should be clear what the nature of that partnership is and that a clear work plan and equitable governance structure has been jointly established, as well as clear expected outcomes of each partnership. NGOs or CBOs listed as partners on a grant proposal submitted by other eligible entities (federal or state agency or land grant institution), should not receive less than 25% collectively of the BFRDP funding awarded. In other words, there should be a *prima facie* test, based on funding shares, that a real partnership in fact exists.

It should be a priority that a sizeable number of NGOs and CBOs are the lead grantees, particularly those that have an established track record of working with farm families on farm issues.

Capacity-building Grants and Smaller Proposals

Given the growing popularity of beginning farmer programs and strong competition for BFRDP awards, we encourage NIFA to consider awarding a few smaller grants (up to \$100,000 a year) each year for newer or smaller organizations. We would recommend that criteria be adopted and would suggest the criteria include at least 12 months of experience providing training or outreach to beginning farmers and an annual budget of \$300,000 or less.

Evaluation Criteria

We believe it would be helpful to further clarify evaluation criteria for the review panels. Here are our recommendations:

Relevancy – In addition to documentation that the project addresses one or more of the priority areas, NIFA should clarify that “relevancy” includes due consideration of at least three major factors: (1) creating the maximum number of enduring beginning farmer and rancher opportunities, (2) ensuring that the enduring opportunities being created are economically viable, environmentally sound, and help create an enhanced quality of life for the farm family and the community, (3) creating farming opportunities that do not diminish farming opportunities for others but rather help reverse concentration and consolidation and foster widely-dispersed ownership of land and resources, helping to increase total farm numbers.

Technical Merit – No additional comments beyond what is in the RFA

Achievability – No additional comments beyond what is in the RFA.

Expertise and track record of 1 or more applicants – In addition to the general factors in the RFA, NIFA should prioritize those applicants and proposals that demonstrate and quantify factors such as the number of training, assistance, or education activities previously carried out, participants or graduates of the program and success rates, and number of years a program or activity has been offered.

Adequacy of plans for participatory evaluation process, outcome-based reporting, and communicating findings and results beyond the immediate target audience – NIFA should

help potential grantees and help review panels understand this criterion by providing definitions and examples of participatory evaluation, outcome-based reporting, and public communication. This may be obvious to some, but obscure to many. It may be clear to the panel whether or not a proposal in fact has an evaluation process, a reporting process, and a communications plan, but the degree of “adequacy” may not be clear. For instance, reporting is often focused on activities and inputs rather than outcomes and impacts, and communications plans often do not reach beyond the immediate clientele to the larger arena of public stakeholders. Insight into these matters can be borrowed and adapted from SARE and other NIFA competitive programs.

Other appropriate factors, as determined by the Secretary— The BFRDP review panel should rank proposals higher that show the degree and frequency of direct face-to-face work and interaction with actual constituencies served. For instance, proposals that include a greater interaction and outreach with beginning farmers and ranchers through activities such as meetings, workshops, field days, one-on-one assistance should receive greater priority.

Review Panels

We continue to encourage NIFA to ensure that the review panel includes a broad cross-section of agriculture. The review panel should include representatives from: non-profit community based organizations serving beginning farmers; beginning, existing, and socially disadvantaged farmers and ranchers; representatives familiar with organic farming, farming for local and regional agriculture markets; producers growing for new and expanding niche markets; and representatives engage in sustainable agriculture work that are familiar with trade, conservation, rural development, energy, or credit issues; and representatives engaged and familiar with serving immigrant and socially disadvantaged farmers and ranchers.

At least a third of those serving on the review panel for BFRDP should be farmers or have demonstrated experience working with non-governmental and community-based organizations with expertise in new agricultural producer training and outreach.

In 2009, the review panel met in July which made it a difficult time for farmers and ranchers to participate. We encourage NIFA to organize the review panel in-person meeting so that it is more possibly for farmers and ranchers to participate on the panel.

Socially Disadvantaged Farmer Set Aside

To ensure that 25 percent of BFRDP projects address the specific needs of limited resource and socially disadvantaged beginning farmers and ranchers (including immigrant beginning farmers, as designated by the Managers language in the conference report for the 2008 Farm Bill, and women farmers as provided for in section 355(e) of the Consolidated Farm and Rural Development Act (7 U.S.C. 2003(e)), and farmworkers desiring to become farmers, as required by statute, we urge NIFA to include specific instructions in the RFA and to the review panels about what kinds of entities would qualify for that funding set aside.

In addition to showing the percent of the project budget that would be allocated for serving one or more of those three groups, the applicant should have demonstrated experience working with one or more of those populations and at least 51 percent of the population served by the project should be members of one or more of those three groups.

Given the funding level for this program, and the combined mandatory funding level for this program and the Outreach and Assistance for Socially Disadvantaged Farmers and Ranchers program, we would not, at this time, recommend a higher than 25 percent reservation of funds.

Overlap between Section 2501 and BFRDP

Applicants should not be prohibited from submitting the same proposal to the BFRDP and Section 2501 programs if they are eligible under the terms of both programs, but identical proposals should not be funded by two different competitive grant programs in the agency. Shared contributions toward a single project, on the other hand, should be permissible in those unique cases in which the program leaders decide, after review panels have completed their work, that cooperative lending would help make the best use of limited funds. However, shared contribution would only work, of course, if the timeline for each program were on roughly the same dates.

Section 2501 will be housed in the Office of Advocacy and Outreach which is also required to coordinate with the BFRDP program. Through the Office of Advocacy and Outreach, there should be coordination between the BFRDP and Section 2501 program administrators to ensure identical proposals are not funded.

Forestry

NSAC has not worked on forestry issues as a coalition, though some of our member organizations manage low-impact forestry programs. We recognize that forest management programs vary considerably from region to region and we recommend that awards are only given to proposals that make the case that beginning farmers have already been turning to forestry as a niche market or viable opportunity in that region of the country. Projects that include or even feature agroforestry approaches that integrate crop or animal production with agroforestry practices should be encouraged and allowed without limit, but forestry-only projects should be capped at not more than 5 percent of funds available.

Matching Requirements

For organizations like those that are members of NSAC and of more limited resources, it is very difficult to come up with a funding or in-kind match in advance.

The option of claiming less than 22% maximum of indirect costs and counting the difference as part of the match does not address the barrier for NGOs and CBOs because the applicant has to have applied for and been assigned an approved indirect cost rate, which is primarily for larger institutions and land grant universities.

At the very minimum, we urge you to provide more detailed guidance regarding accessible and creative ways that smaller organizations can obtain an acceptable 25% in-kind match. In addition, we urge you to create a streamlined process for NGOs and CBOs to obtain an approved indirect cost rate, or, preferably, follow the recommendation below on cooperative agreements.

Cooperative Agreements

We strongly recommend that all awards under the BFRDP be made as cooperative agreements. Those cooperative agreements should therefore be limited, per the appropriations bill, to not greater than 10 percent indirect costs. That 10 percent maximum limit should be applied universally to institutions, agencies, and organizations that are applying for grants. The SARE program awards are all made as cooperative agreements and can serve as an example for BFRDP administrators.

Geographic Diversity and Technical Assistance

It is our understanding that applications were received from 43 states in addition to Washington D.C., Micronesia, and Puerto Rico. That is very encouraging.

As you reported, the breakdown of grant application and awards by region: Northeast – 18% applied, 27% awarded; North Central – 34% applied, 33% awarded; West – 17% applied, 24% awarded; South 29% applied, 15% awarded.

It is clear that the proposals submitted from the Northeast and the West competed very well, while proposals submitted from the South did not compete as well. We congratulate you for the extra outreach you are already making to the southern region. The less competitive proposals from the Southern region of the country could indicate that NIFA also needs to provide technical assistance with proposal writing and outcome-based reporting to ensure that a diversity of groups can apply for the BFRDP. The BFRDP Program Leaders might consider regional teams or a third-party consultant to deliver the technical assistance that is needed.

Clear and Consistent Definitions

The terms “project partner,” “collaborative arrangement,” “consultant,” and “subcontractor” should be clearly defined at the beginning of the RFA and in the Definitions section at the end of the RFA and then used consistently and appropriately throughout the application. The expectations and expected documentation needed for each should also be clearly stated.

Application Process in General

The majority of our member organizations who are community-based organizations with many years of experience applying for federal competitive grants, found the BFRDP application process to be one of the most difficult and time intensive application processes they had ever been through, inclusive of other USDA REE, AMS, RMA, and RD applications. Their overwhelming feedback is that the process appeared designed for academic and other larger institutions and that the staff time and computer capacity required completing the applications made it exclusionary for smaller community-based organizations with limited resources.

We suggest that when possible, NIFA provide more detailed information about application expectations or templates for applicants to use, such as for collecting budget justification and work plan information, so that the information is consistently presented across applications.

Several NSAC organizations also reported having great difficulty using the online application process—one organization lost their entire application when the online www.grants.gov program suddenly shut down. Our concern is that many high quality proposals, especially from limited

resource constituencies, may have failed the application process due to problems encountered with the electronic submissions than because they do not meet the eligibility requirements.

If NIFA chooses to continue with a strictly electronic submissions process, then that process must be made much more accessible. Conversely, NIFA could make it an option for applicants to submit paper applications. Whatever is decided, we strongly and emphatically urge you to not make grants.gov the only option available. It is a bad advertisement for “good government.”

Roll Out and Publicity

Finally, we encourage NIFA and the Department to do a roll out of the first set of awards with all due fanfare, remembering that this is the first program at USDA, outside of farm credit loans, specifically aimed at beginning farmers since the Department’s founding in 1862. In other words, this is an historic and momentous occasion and should be celebrated as such. More importantly, over time, we hope NIFA will show a continued commitment to communicating best practices and new tools and ideas to program participants and the wider field of beginning farmers and beginning farmer organizations as well as to communicating success stories to the general public. We look forward to helping with those efforts to the best of our abilities.

Thank you for the opportunity to submit comments and for your continuing commitment to making this a great program. We look forward to continuing our active involvement with you and with the evolution of this important program.

Sincerely,



Aimee Witteman
Executive Director
National Sustainable Agriculture Coalition