National Sustainable Agriculture Coalition

Value Added Producer Grant Program:
Recommendations for
Program Implementation, Future Notices of Funding Availability, and a New Rule

On behalf of our 40 represented member organizations[1], the National Sustainable Agriculture Coalition (NSAC) offers the following recommendations on Value Added Producer Grant Program (VAPG). NSAC's recommendations focus on program implementation and administration, with a particular focus on 2014 Farm Bill changes and improvements to streamline administration.

NSAC has been closely involved in the creation and development of VAPG. NSAC helped to shape VAPG's first authorization through the Agricultural Risk Protection Act of 2000. NSAC led the campaign to expand VAPG as part of the 2002 Farm Bill, which expanded the program to include value-added production methods, such as organic and grass-fed, while increasing the program's mandatory funding levels.

NSAC advocated for changes and increased funding through the 2008 Farm Bill, which further expanded the program's scope. Specifically, the 2008 Farm Bill expanded VAPG to include locally produced and marketed food projects and regional food supply chain projects. Additionally, the 2008 Farm Bill codified the program priority for small and mid-sized family farms, and established the set-asides for beginning and socially disadvantaged farmers and for the regional food supply chain projects. In the 2014 Farm Bill, NSAC's advocacy helped lead to the policy clarification for priority projects from producer groups and to $63 million in mandatory funding over the life of the bill.

Throughout farm bill reauthorizations and the annual appropriations process, NSAC has consistently prioritized securing funding for VAPG.

VAPG is a critical program that addresses unique needs that farmers and entrepreneurs face in launching, establishing, and growing successful farm and food-based businesses. We submit the following recommendations with those goals in mind.

In addition to the issues covered in this memo, we also have a number of detailed recommendations with respect to the Interim Final Rule, which we will be glad to share with you at an appropriate time.

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[1] 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.

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We appreciate the opportunity to provide these initial comments.

Sincerely,

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RECOMMENDATIONS

A. Funding and Policy

1. Funding Levels

Recommendation: Funding levels should reflect amounts from both the farm bill and annual appropriations process.

VAPG's $63 million in mandatory funding over the life of the 2014 Farm Bill, along with $15 million in discretionary funding from the Fiscal Year (FY) 2014 Appropriations Bill, provides USDA the opportunity to return to (and even exceed) its historic $20 million average annual funding level in FY 2014 and to fund a diversity of projects that meet the needs of applicants and communities across the country.

In order to maximize the use of and protect funding levels for VAPG, USDA should ensure that both mandatory and discretionary amounts are used in each year's request for applications. Using both amounts for the same NOFA should help shield the program from cuts through CHIMPing. Because the $63 million in mandatory funding is a lump sum, whatever amount remains following a VAPG funding cycle will be vulnerable to CHIMPing every year. Combining the funding amounts will allow USDA to more effectively respond to sky-rocking demand for the program and build a strong case to the appropriators for strengthening – instead of cutting – funding.

Ideally, if we are able to keep future appropriations in the range of the $15 million appropriated for FY 14, and if the mandatory funding is spent on a roughly pro-rata basis, then the total combined annual funding level would be approximately $27.5 million. While not back to the $40 million funding level of 2002 and 2003, total funding of over $25 million a year would be substantially better than recent years and a tremendous step forward.

> ***Note:*** We are uncertain of the current status of the 2014 Farm Bill mandatory funding relative to sequestration. We are hopeful that USDA has identified how to keep those new funds from being subject to sequestration since they were actualized after the sequestration list went into effect. We look forward to hearing an update on this issue in the near future.

2. Maximum Grant Size

Recommendation: Return the ceiling on planning and working capital amounts available for applicants to previous levels.

In the FY 2013 and 2014 Notice of Funding Available (NOFA), the maximum amounts for grants were set as follows: $75,000 for Planning and $200,000 for Working Capital. Over the past five funding cycles, however, the maximum award amounts have been considerably higher – $100,000 for Planning Grants and $300,000 for Working Capital Grants. In order to ensure that a diversity of projects apply for and can receive VAPG funding, and that VAPG serves the needs of producer-applicants, USDA should return to its previous levels of $100,000 for Planning Grants and $300,000 for Working Capital Grants.

Of the 110 grants awarded in the last funding round (for FY 2012), 41 were for Working Capital Grants of over $200,000. This demand (37 percent of total awardees) demonstrates the importance of returning the ceiling on grant amounts to its previous levels. While the lower grant award amounts may have been the result of VAPG's previously precarious situation due to the farm bill extension in 2013, the robust 2014 Farm Bill and FY 2014 appropriations funding levels for VAPG means that the previous limits on maximum grant award amounts can now be reinstated.

3. Funding Set-Asides

Recommendation: In order to protect the two 10 percent funding set-asides for Mid-Tier Value Chains and beginning/socially disadvantaged farmers/ranchers, USDA should make re-pooling coincide with the NOFA timetable.

The set-asides are an important way to ensure that projects funding Mid-Tier Value Chains (MTVCs) and benefitting beginning/socially disadvantaged farmers/ranchers are more likely to be awarded. In order to protect the two mandatory 10 percent funding set-asides for Mid-Tier Value Chains and beginning/socially disadvantaged farmers/ranchers, USDA should make the funding set-asides coincide with the NOFA timetable.

The intent of the June 30 re-pooling provision was to ensure that funds not awarded by the last quarter of the fiscal year can be released from the set-aside and used in the larger pool. However, due to the lateness of appropriations and the extreme lateness of NOFAs, the intent of the provision is being lost.

Once proposals have been evaluated and ranked, it will be clear whether or not the set-aside funds will be fully used or not. At that point in the process, it should be simple to shift any unused set-aside funds over the main pool to fund the next highest-ranking projects.

Note that the regulation[2] states that:

> Funds not obligated by June 30 of each fiscal year shall be available to the Secretary to make grants under this subsection to eligible entities as determined by the Secretary.

The regulation thus allows the Secretary the discretion to put unobligated funds back towards projects benefiting beginning/socially disadvantaged farmers/ranchers and MTVCs funds, even if the June 30 date has passed. Thus, in our view, there should never be another NOFA in which the set-asides are deleted.

For years during which USDA releases the NOFA in the fall or early winter – as we hope they will all be – this will not be an issue. But if there are late years again in the future, we believe the current regulation allows the flexibility to keep the set-aside in place, and to undertake re-pooling after proposals have been evaluated and ranked.

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[2] http://www.gpo.gov/fdsys/pkg/CFR-2012-title7-vol15/pdf/CFR-2012-title7-vol15-part4284-subpartJ.pdf

4. Priority Categories

Recommendation: Remove cooperatives from the priority categories.

The interim final rule published February 23, 2011 and effective March 25, 2011[3] allowed for the first time projects from farmer and rancher cooperatives to receive priority points. However, neither the 2008 Farm Bill nor the 2014 Farm Bill makes coops a priority category. The 2014 Farm Bill in fact added a new priority category (veterans) and specifically did not affirm the Department's addition of cooperatives as a priority category. Moreover, the farm bill also does not provide authority for USDA to add priorities beyond those designated in law by Congress. Therefore, there is no legal basis for the current IFR provision and it should be revoked.

The effect of having coops as an eligible category for the priority points is to negate or weaken the statutory priorities. Projects which best serve small and mid-sized family farms or beginning, socially disadvantaged, or veteran farmers and ranchers are awarded priority points, per the statutory requirements. Project proposals from cooperatives that meet one or more of these four statutory priorities will receive priority points. The addition of coops as an additional priority logically means that coops that do not meet the statutory priorities – i.e., that do not substantially serve small and mid-sized family farms or beginning, socially disadvantaged, or veteran farmers and ranchers – will also receive priority points. The inclusion of a separate priority for coops at worst effectively negates or at best severely weakens the priorities for the program established by Congress in 2008 and reaffirmed in 2014.

We urge you to remove the coop priority before the next NOFA is issued. We also urge you to inform grant reviewers for the current NOFA to only award priority points to coops that are judged to effectively and substantially serve one or more of the four statutory priorities.

> ***Note:*** The same critique holds with respect to the Department's decision to make mid-tier value chains a priority category. However, unlike cooperatives, mid-tier value chains are at least a specific funding set-aside category within VAPG, and hence it is more reasonable to treat them as a priority category. However, if a mid-tier value chain proposal is substantially and effectively serving one or more of the four statutory priority categories, the proposal will already receive the appropriate priority points. The only purpose of making mid-tier value chains a priority rather than just a funding set-aside is to make allowance for priority points for mid-tier value chains that are not significantly benefitting small and medium-sized family farms or one of the other priority categories. Hence, we suggest that mid-tier value chains also be removed from the priorities.

5. Geographic Preference Points

Recommendation: Reduce geographic preference points from ten to five.

Under the regulations governing VAPG, USDA may award up to 10 points to an application to improve the geographic diversity of awardees in a fiscal year. We support the idea of assisting producers in all States with value-added projects, but believe the most effective way to accomplish

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[3] http://www.gpo.gov/fdsys/pkg/FR-2011-02-23/pdf/2011-3036.pdf

this objective is to engage in effective outreach through the State offices and directors, the RD Outreach staff, and the Office of Advocacy and Outreach, as well as through Strike Force.

The effect of having 10 percent of total ranking points used to achieve geographic diversity is unfortunately to counteract the basic concept of a competitive grants program, i.e., awarding funding to the most viable and sustainable projects that best help U.S. agricultural producers enter into value-added activities. Also, by setting geographic preference points on a par with program priority points, the Department is providing a means for projects that do not serve the program priorities to nonetheless gain the same number of points as those that do, provided they are submitted from a geographically favored state. This greatly diminishes the role of the statutory priorities.

We urge you to reduce the point value of the geographic preference to five points out of 100, while raising the maximum points for the program priorities from 10 points to 15 points out of 100. In our view, 15 points out of 100 to reflect the congressionally-prescribed program priorities is certainly not too large. By retaining five points for geographic diversity, flexibility is retained to ensure that more States can be served in instances where enhanced outreach proves insufficient.

6. Priority Points for Group Projects

Recommendation: Implement the 2014 Farm Bill clarification on program priorities by instructing project reviewers to determine the degree to which projects serve the priority category and to award points accordingly.

The 2014 Farm Bill clarifies that projects from eligible producer groups, farmer/rancher cooperatives, and majority-controlled producer-based business venture that "best contribute to creating or increasing marketing opportunities for" operators of small/medium-sized family farms/ranches or beginning, socially-disadvantaged, or veteran farmers/ranchers receive priority. We applaud Congress in providing flexibility in using the language "best contribute to."

> ***Note:*** Nothing needs to be changed with respect to individual farmer or rancher proposals. In the case of single producer projects, the applicant is a small or medium-sized farm or beginning, socially disadvantaged, or veteran farmer or rancher, or is not. If they are, they receive the maximum priority points, and if they are not, they receive zero priority points.

There has been great confusion since passage of the 2008 Farm Bill (and indeed since the 2002 Farm Bill's conference report language identifying the small and medium-sized family farm priority) over how to implement the statutory program priorities, with both the IFR and the NOFAs including rigid numerical tests and 'all-or-nothing' scoring. Both the numerical tests and the all-or-nothing scoring should be replaced with a system based on effective peer review to determine which group projects do the best job of advancing one or more of the Congressional priorities.

This will be easier to accomplish once a full peer review process has been established (see recommendation B.7. below). In the meantime, however, the agency should provide specific instructions to project proposal evaluators, including specific questions reviewers should ask of each proposal purporting to address one or more of the four priorities. We would be happy to confer with program staff about ways to ensure strong and consistent scoring of proposals by reviewers with respect to the program priorities.

Also, in order to clearly communicate the program's statutory priorities, the new rule and all future NOFAs should prominently state the program priorities. In addition, in order for proposal writers to provide the pertinent information, the agency should include specific instructions for how the applicant should indicate whether or not the project addresses one of the four priorities, and if so, to what extent it does so.

> ***Note:*** The words "creating or increasing marketing opportunities" in the new farm bill language clarifying program priorities with respect to group projects is NOT a new priority, but rather is simply a restatement of the basic purpose of the program as a whole.

7. Mid-Tier Value Chains

Recommendation: Clarify that Mid-Tier Value Chains do not have to be majority-controlled producer-based or producer-owned but rather must have a formal contract with producers (including the applicant) who have a major decision-making role.

In order to best attract projects that promote the development of MTVCs, the current regulatory limitation requiring that projects be entirely carried out by one of four applicant types (three of which are producer owned – independent producer, agricultural producer group, or farmer and rancher cooperative – and one of which is majority-controlled producer-based) should be removed. The applicant clearly must be one of the eligible categories, but the applicant can then work with a MTVC that may or may not also be a producer-owned farm, coop, or business.

The purpose of such a restriction was presumably to ensure that producer groups would have a major stake in the MTVC project and be beneficiaries of the VAPG grant in developing their farm businesses. However, a formal contract that allows producers to have a major decision-making role in all aspects of the MTVC, including pricing, would also serve the purpose of giving producers a stake in the project and benefiting those producers.

This proposed expansion of the current restriction would make the program far more relevant to MTVCs -- including food hubs that are MTVCs -- while benefiting producer applicants and achieving Congressional intent that VAPG do as much as possible to foster MTVCs.

8. Advertising and Branding

Recommendation: Cap advertising and branding activities at no more than 50 percent to enable VAPG to continue funding a diversity of projects and not turn the program into a domestic version of the Market Access Program, which was never Congress' intent with respect to VAPG.

Early program NOFAs and the proposed rule for the program included a limitation of 25 percent of a project's cost that could be used for branding activities. Unfortunately, the IFR and NOFAs since allow applicants to devote all grant funds to advertising and branding. We agree that a value-added enterprise needs to engage in advertising and branding activities and that these can be a critical component of a project. However, allowing a project to simply advertise existing value-added products and nothing more is a distortion of the program's intent. If the previous 25 percent cap was seen as too limiting by some applicants, it does not necessarily follow that there should be no cap at all. We recommend that a cap be reinstated in the rule and NOFA at not greater than 50 percent of the total project.

B. Administration and Management

1. NOFA Timing

Recommendation: To best meet the needs of producer-applicants, NOFAs should be issued in the fall or winter of each year (avoiding release during the week of federal holidays), maintain a 90-day application period, and provide any deadline extensions in a timely manner.

By issuing NOFAs in the fall or early winter of each year, USDA can ensure a greater and more diverse pool of applicants by providing producers time during the off-season to work on applications. NSAC member groups have stressed the importance of having NOFAs for USDA programs that do not conflict with the busy growing and harvest seasons. While the NOFAs for FY 2011 and 2012 were issued in June 2011 and August 2012, the NOFA for FY 2013 and 2014 was issued in November 2013, a marked improvement in timing that several NSAC member groups noted. Also, by releasing NOFAs during a non-holiday week, applicants are afforded more time to plan and write their proposals.

Additionally, an application period of 90 days (as had occurred with the most recent NOFA) should be retained to allow producer-applicants ample time to generate complete and well-developed applications.

While the NOFA's release for the most current funding round was an improvement over previous cycles, the considerable delay in the extension of the deadline for applications was frustrating for applicants. The announcement of the deadline extension occurred on March 25, 2014, just over a month after the original deadline had passed. While an extension of the original February 24, 2014 deadline to incorporate changes from the 2014 Farm Bill and increased funding levels from both FY 2014 appropriations and the farm bill was necessary, USDA needs to improve its efforts to announce and implement extensions prior to the original deadline. Hopefully, such extensions will not be needed in the future so this will not even be an issue.

2. Advance Eligibility Reviews

Recommendation: State RD offices should continue to provide technical assistance up to 14 days before the application deadline, including determinations and assistance with eligibility.

Under the regulations governing VAPG, USDA allows applicants to contact their State RD Office well in advance of the application submission deadline with questions, including on project eligibility. The FY 2012 and 2013-2014 NOFAs (with the extended April 8, 2014 deadline) allowed applicants to receive technical assistance from their State RD Offices.

In the FY 2011 NOFA, applicants were allowed "a preliminary review of their application for eligibility and completeness," with the confusing caveat that any applications received after 30 days prior to the application deadline would be considered a final application. In order to ensure that applicants receive the assistance needed and that USDA receives complete and well-developed applications, NOFAs should provide for both technical assistance and preliminary eligibility determinations up to 14 days prior to the application deadline.

3. Training and Administrative Funding

Recommendation: Improve capacity, efficiency, and staffing for VAPG.

As fiscal constraints on agency resources continue, the need for enhanced comprehensive training for State USDA staff working on VAPG becomes even more critical. Training should include outreach, program eligibility, the review process, appeals, and award disbursements.

Longer term, we believe the agency needs to secure dedicated program administration funds at a level that befits a national competitive grants program of this size. We secured such funding in the 2014 Farm Bill for the Agricultural Marketing Service for implementation of their comparably sized Farmers Market and Local Food Promotion Program, as we have done in the past for the National Institute of Food and Agriculture's similarly sized Sustainable Agriculture Research and Education Program.

We note the CONACT provision providing for administrative costs for the Community Facilities program. This perhaps can serve as a model for VAPG. If there are any administrative mechanisms or appropriations bill means to provide for a similar outcome for VAPG as currently exists for Community Facilities, we urge you to advance them. We would be pleased to help champion them.

4. Outreach and Transparency

Recommendation: Increase transparency and improve outreach on the program to prospective applicants through partnerships, webinars, an updated website, and resources such as project award descriptions.

An oft-cited complaint of VAPG has been the lack of outreach materials and efforts widely advertising the program and explaining the process of applying for funds. USDA should partner with stakeholder groups such as NSAC to broadcast the program once funding is available and to share resources with prospective applicants.

Webinars for general applicants and for priority or special focus applicants could be regularly incorporated into outreach efforts, with stakeholder groups assisting with webinar planning, hosting, and implementation when appropriate. Although for the most recent VAPG round there were webinars for tribal applicants and food hub projects, other webinars, even for general applicants, were missing. USDA should have regular VAPG webinars (at least one for general applicants) for the full range of applicants available within weeks of the release of the NOFA.

Additionally, improvements are needed to the website. As the face of an organization, websites serve not only as portals of information to millions but as part of an unspoken public relations campaign that influence the public perception of an institution. Difficult to use, poorly designed, and stale websites with outdated or incorrect information can create public mistrust and disengagement, damaging an organization's reputation and efforts. In its current state, the RD website, including for VAPG, has been cited as being outdated, difficult to navigate, and missing critical information. Hopefully the new RD website will be a major improvement.

Improved transparency can also be part of a new website. Currently, the VAPG page for the USDA website provides lists from FY 2011 and 2012 of grantees, their award amounts, and location (either State or city and State). Such a list, while useful to helping pinpoint the size and geographic scope of awards, lacks the project descriptions that would be helpful to understanding the types of projects funded and communities and producers that are benefiting from the program. Project descriptions, which are readily available for programs such as the Farm to School, Farmers Market Promotion Program, and Sustainable Agriculture Research and Education, help prospective applicants better understand the purpose of programs and the types of projects that can be funded. This information can better inform applications by new applicants and those who have failed to receive awards, as well as publicize the program and attract new applicants. Project descriptions can also educate Members of Congress about the importance of these programs and help bring about improvements and strong funding levels. USDA should ensure that continuously updated project descriptions are available on the VAPG website for the program.

5. State Office Eligibility Reviews

Recommendation: Revoke eligibility review responsibility for State offices with a track record of problems and complaints.

Over the past several years, several NSAC members have identified problems with specific State RD office eligibility reviews for VAPG, noting the lack of responsiveness from those offices to correct their errors. Among the problems identified, which have been relayed to the national office on several occasions, are the use of incorrect criteria and arbitrary denials of eligibility for proposals.

With both the State RD staff and State RD directors failing to remedy the problems identified over a number of years, the national office should revoke those States' eligibility review responsibility and make appropriate State staffing adjustments. Ideally, the national office would then be responsible for eligibility reviews instead of the problematic State RD offices. However, if staffing presents an issue to allow the national office to take on this responsibility, then USDA should contract with a third-party to conduct the eligibility review. Without these changes, the problem will remain and valuable projects in those States will go unfunded (in part due to decreased applicant interest because of such difficulties) and communities and producers in need of assistance through VAPG will languish.

6. Proposal Reviews

Recommendation: In the short term, provide greater transparency and information sharing among reviewers and between USDA and applicants.

Currently, VAPG reviewers work in isolation from other reviewers and lack the ability to share information and more thoughtfully discuss applications with others. While the VAPG review process is not a true peer review panel process (see below), USDA should provide for conference calls and other information sharing mechanisms to help reviewers share insights and information about the review process and help one another with challenges in their conducting their reviews.

Likewise, information between USDA and applicants is lacking – with applicants not receiving feedback on ways their applicants did not meet eligibility criteria or on ways their applicants did not score well enough to receive funding. USDA should provide feedback on both eligibility screenings and the review of each application to help those applicants improve on future applications and to encourage a greater number of applicants. The lack of information VAPG applicants receive on their applications (which often come at a considerable expense of time and money) creates frustration and discourages applicants who have failed to receive funding from reapplying.

7. Full Peer Review Panels

Recommendation: Move as quickly as possible to full peer review panels on par with all other USDA national competitive grant programs.

There are many excellent USDA examples of robust peer review processes for national competitive grants programs, including programs operated by NIFA (e.g., Sustainable Agriculture Research and Education and Beginning Farmer and Rancher Development Program), AMS (e.g., Farmers Market and Local Food Promotion Program), and FNS (e.g. Farm to School Grants). We believe RD should take the best ideas from other USDA competitive grants programs and formulate its own peer review process for VAPG grants. We realize this cannot happen overnight, and hence include shorter-term recommendations above for how to improve the current system of review. But in the long run, we believe a more robust review system is critical to the effectiveness and integrity of the program.

8. Appeals

Recommendations: Administer appeals in a timely, single, streamlined process.

Concerns over the timeliness of appeals have been ongoing with several NSAC member groups, who have noted that the appeals process is ineffectual. From conversations with USDA RD staff, we understand the appeals process is currently a two-tiered system – with appeals first going to the State director's office and then moving to the national office. This two-tiered system unnecessarily adds administratively delay and may be harmful, rather than helpful, to the appellant. For instance, the impartiality of State directors' offices may be questionable – especially for those State RD offices where, for years, staff have continuously been problematic or have shirked their responsibilities, without any consequences for their actions. By having appellants first go to the State directors' offices, in these cases, would only waste time and resources.

Instead, USDA should devise a single, streamlined system that allows appellants to take their appeals directly to the national office, to make a final and binding decision. Eligibility determinations should be made and notifications sent out within 30 days of the close of the application deadline. For those appealing eligibility determinations, those appellants should be notified within 10 days of their appeal to enable those applications deemed eligible on appeal to be included in the funding round for which they originally applied.