

COMMENTS & RECOMMENDATIONS

To: Colien Hefferan, Administrator, CSREES

From: D.C. Coston, Chair, the Farm Bill Implementation Assistance Committee of NASULGC's Board on Agriculture Assembly

Date: September 24, 2008

Cc: The Honorable Gale Buchanan, Under Secretary for Research, Education, and Economics

Re: Comments on Establishment of the Agriculture and Food Research Initiative (AFRI)
CSREES-2008-0002

The Cooperative State Research, Education, and Extension Service (CSREES) published a "request for stakeholder input" in the August 29, 2008 *Federal Register* on the newly created Agriculture and Food Research Initiative (AFRI) authorized in Sec. 7406 of the Food, Conservation, and Energy Act of 2008 (P.L. 110-246). The following comments are presented by the Farm Bill Implementation Assistance Committee on behalf of the Board on Agriculture Assembly of the National Association of State Universities and Land-Grant Colleges (NASULGC). Like the *Federal Register* announcement, these comments and recommendations are preliminary in nature and our committee will provide a more in-depth response when the formal AFRI rule-making takes place.

Comments & Recommendations:

1. Growth in Funding. AFRI, like the National Research Initiative (NRI) which it replaced, is primarily a "research" initiative. (Prima facie evidence can be found in the name itself.) However, the law now permits the agency to also make competitive grant awards to stand-alone "extension" and "higher education" projects. Significant increases in AFRI funding will, therefore, be necessary to support such new "stand-alone" grants while continuing to fund fundamental and applied research projects and those that integrate research with extension and/or higher education. *We urge the Department to recognize this need via increased annual budget/appropriations requests.*

2. Integrated Grants. The basic authorization of appropriations for AFRI states that "not less than 30 percent [of the funds] shall be made available for integrated research pursuant to section 406 of the Agricultural Research, Extension, and Education Reform Act of 1998." *This language should not be interpreted to mean that the range of "integrated" grants to be funded under AFRI be limited only to the specific areas currently funded under the section 406 authority. A broader interpretation comports with congressional intent.*

3. Eligible Institutions. Institutions eligible to receive AFRI grants include "other federal agencies." *We suggest that this eligibility be used to encourage collaborative grants between these federal agencies and eligible non-federal entities. After all, these other federal agencies already receive substantial appropriations of their own.*

4. Review Panels. Sec. 7406 states that “a system of peer and merit review” shall be used to “determine the relevance and merit of [AFRI] proposals.” *We recommend that peer review panels should be constituted according to the nature of the proposals to be reviewed. For example, Cooperative Extension faculty should be recruited and strongly encouraged to serve on review panels for extension and integrated proposals.*

5. Priority-Setting Among Program Areas. Specific priority needs change over time, sometimes rapidly. *Therefore, CSREES should continue to actively seek and carefully consider specific priorities identified by a diverse set of stakeholders. These should include sources from the private for-profit and non-profit sectors, academia, state and federal agencies, and consumers in general.*

6. Ten-Year Grants. It is well known that certain priority areas can only be adequately addressed by long-term support (e.g. plant and livestock breeding, ecosystem studies, rural entrepreneurship, public education, etc.). *AFRI’s new 10-year grant authority should be used whenever appropriate to fund these crucial activities. The opportunity for long-term (up to 10-year) grants should not be restricted to specific program areas, but should be made available throughout AFRI.*

7. Additional Priority Areas. Sec. 7406 refers to six major priority areas with between four and eight very specific sub-areas that should be addressed through this initiative. The six priority areas are: (1) plant health and production and plant products; (2) animal health and production and animal products; (3) food safety, nutrition, and health; (4) renewable energy, natural resources, and environment; (5) agriculture systems and technology; and (6) agriculture economics and rural communities. *Unless prohibited by statute, we recommend the Department add an additional priority area that focuses on families, youth and communities. Additionally, as established priorities are implemented, traditional land grant customers (producers, consumers, families, youth, and communities) need to be included in the scope of all priority areas.*

8. Recognition of the Partnership. It is important to recognize the local, state, and federal partnership that undergirds the land-grant system. Additionally, effective land-grant programs that ultimately lead to positive behavioral change require a long-term research, education, and extension commitment that operates on a continuing and engaging basis. *This principle should be considered in stand-alone and integrated RFAs and in criteria for evaluating proposals.*

9. Allocation of Funds. Sec. 7406 (b)(6) of P.L. 110-246 reads as follows:

“(6) SPECIAL CONSIDERATIONS.—In making grants under this subsection, the Secretary may assist in the development of capabilities in the agricultural, food, and environmental sciences by providing grants—

“(A) to an institution to allow for the improvement of the research, development, technology transfer, and education capacity of the institution through the acquisition of special research equipment and the improvement of agricultural education and teaching, except that the Secretary shall use not less than 25 percent of the funds made available for grants under this subparagraph to provide fellowships to outstanding pre- and post-doctoral students for research in the agricultural sciences;

“(B) to a single investigator or coinvestigators who are beginning research careers and do not have an extensive research publication record, except that, to be eligible for a

grant under this subparagraph, an individual shall be within 5 years of the beginning of the initial career track position of the individual;
“(C) to ensure that the faculty of small, mid-sized, and minority-serving institutions who have not previously been successful in obtaining competitive grants under this subsection receive a portion of the grants; and
“(D) to improve research, extension, and education capabilities in States (as defined in section 1404 of the National Agricultural Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3103)) in which institutions have been less successful in receiving funding under this subsection, based on a 3-year rolling average of funding levels.”

We recommend that the Department fulfill these requirements, create the mechanisms to do so, and allocate a pre-determined amount of funding. Additionally, these special considerations should be included within any RFA.

10. Research Programs

- *In this transition year from the National Research Initiative (NRI) to the new AFRI, now is not the time to reduce the investment in fundamental research currently supported within the NRI.*
- *Although Sec. 7406 draws a distinction between “fundamental” and “applied” research, these are two end-points along a continuum of activity and proposals that fall elsewhere on that continuum (or otherwise link fundamental and applied research) should be encouraged.*
- *Priority areas that require sustained long-term activity should be funded as 10-year grants.*
- *RFA program areas should generally be broad enough in scope to allow scientists maximum creativity and flexibility in developing proposals.*

11. Extension Programs

- *Stand-alone extension activities should be encouraged and funded under AFRI.*
- *RFAs for extension activities should include review criteria appropriate for extension.*
- *Proposals that utilize modern information technologies to share courseware and/or non-credit courses and curricula across institutions should be encouraged.*
- *RFA program areas should be broadly focused and emphasize continuous interaction with customers and multistate programming.*
- *In determining priority areas, we encourage consideration of not only subject or disciplinary areas (e.g., plant and animal systems), but also inclusion of strategic mechanisms that can advance the development and application of science-based information in all subject areas that may lead to improved economic and social welfare of America’s citizens. Emphasis should be placed on supporting the dissemination and adoption of technologies through effective, multi-state, collaborative initiatives.*

12. Education Programs

- *Proposals that enhance professional workforce development in areas of significant need as identified by the private sector (e.g. fruit and vegetable production, plant breeding, and rural sociology), should be encouraged.*
- *Emphasis should be placed not only on activities that enhance undergraduate and graduate enrollment in the priority areas, but also on those that increase interest in these career paths among K-12 students. A revitalization of summer apprenticeships for rising junior and senior high school students as well as opportunities for “summer research sabbaticals” or “summer science teacher workshops” for high school teachers should be instituted.*
- *Proposals that utilize modern information technologies to share courseware and/or courses and curricula across institutions should be encouraged. Emphasis should be given to the establishment of regional centers of academic excellence in specific discipline areas (where the continued presence of programmatic excellence in each and every institution can not be justified) for the preparation of a new scientific cadre needed to succeed the “baby-boom” generation that is reaching retirement.*
- *Proposals that utilize and broaden the applications of new cognitive knowledge for the enhancement of learning should be encouraged.*
- *National Need Fellowship programs should be expanded and integrated in a manner that would link multidisciplinary and disciplinary education with discovery research.*

13. Integrated Programs

- *Integrated activities should form a foundation across all AFRI program areas and a separate RFA for integrated activities alone is not appropriate. Certain specific areas may be more appropriate or more effectively addressed by integrated activities and integrated proposals may be encouraged or required in those areas, but the request for these proposals should be incorporated into RFA(s) that also include non-integrated activities. The request for such proposals should be included within a single RFA.*
- *Integrated proposals must include a significant component of two or more of the tripartite land- grant mission of learning, discovery, and outreach. These components should not only be coordinated and collaborative, but interdependent in addressing issues and priorities.*
- *Serious consideration should be given to the establishment of an IGERT-like (Integrative Graduate Education and Research Traineeship) program for a portion of the integrated programs.*
- *The requirement for no less than 30 percent of the AFRI funding in integrated programs will require additional commitment to recruiting and training teaching and extension personnel to participate in the AFRI. This will need to occur quickly to meet the requirement.*
- *Care should be taken that integrated programs are truly integrated and that extension and teaching faculty are included in the planning of such projects and not simply a “tag on” to secure funding in this area.*