

2018 Research, Education, and Economics Farm Bill Implementation Listening Session

Comments on the Implementation of the Farm Bill from the Northeastern Regional Association of State Agricultural Experiment Station Directors (NERA)

I'm writing on behalf of the Northeastern Regional Association of State Agricultural Experiment Station Directors (NERA.) NERA is composed of fourteen state agricultural experiment stations (SAES) in the northeast, primarily located on the campuses of the region's thirteen Land-grant universities. All these stations contribute to a nationwide research system dedicated to meeting the global challenges associated with agriculture, food systems, natural resources, and human nutrition by offering the best available science. Hence, we have great interest in the implementation of the 2018 Farm Bill. Below we cite specific sections of the Farm Bill and make recommendations on items related to implementation.

Section 7613. Review of Land-Grant Time and Effort Reporting.

This section of the Farm Bill compels the Secretary to review and revise current reporting requirements related to time and effort for entities receiving funds from the USDA (e.g., state agricultural experiment stations.) The Farm Bill stipulates that revisions made to time and effort reporting by the Secretary must be done in collaboration with entities receiving funds. Further, the revisions should reduce paperwork and time required to meet the reporting requirement. NERA asks: what process will be used for reviewing current reporting requirements? How will the state agricultural experiment stations and the Land-grant universities be engaged? We strongly encourage the Secretary to employ a process that engages institutions from all the regions of the country and reflects the breadth of institutions within the Land-grant system: small and large; 1862, 1890, and 1994.

Section 7614. Matching Funds Requirement.

This part of the Farm Bill repeals sections that provided Land-grant universities with a waiver of match for certain grant programs administered by the National Institute of Food and Agriculture. This requirement, while onerous to all institutions, has an inordinate negative effect on the smaller Land-grant universities in the Northeast; institutions whose capacity to match is very limited. If match is to be provided by institutions seeking competitive grants, NERA strongly endorses a wide interpretation of "in-kind support" to meet the 1:1, Federal: non-Federal matching requirements for programs like the Specialty Crops Research Initiative (SCRI) or the Organic Agriculture Research and Extension Initiative (OREI).

Further, this section of the Farm Bill (as do other sections), provides latitude to the Secretary to waive the matching funds requirement if the Secretary determines that the results of a project are of a particular benefit, or if the project involves a minor commodity and deals with scientifically important research and the recipient is unable to satisfy the matching funds requirement. NERA seeks a clear articulation of the process to seek the waiver of matching funds. Currently, National Program Leaders are sharing with prospective grant writers to

programs that previously waived the match requirement for Land-grant university applicants (e.g, SCRI) that *“The 2018 farm bill reinstated the matching requirement for SCRI. This means that the total amount of federal funds received must be matched dollar for dollar with non-federal funds. Non-federal funds can be either cash or in-kind contributions. For 2019, you will not be allowed to claim unrecovered indirect costs as part of the matching requirement.”* Currently, if an applicant cannot meet the match requirement at the time of submission of the grant, the grant cannot be submitted. What is the process for securing a waiver of match for programs like SCRI or OREI? Why is unrecovered indirect cost not an allowable means to meet the matching requirement? NERA strongly endorses the utilization of unrecovered indirect cost as a means to meet the match requirement. Likewise, NERA seeks a process that would allow the prospective grant applicant an opportunity to seek a waiver of match prior to submission of a full grant proposal.

Hemp

Hemp is mentioned numerous times in the Farm Bill: as a supplemental crop, as an area of legitimate research, and as a specialty crop. We also note that hemp is excluded from the definition of ‘marihauna.’ NERA seeks timely clarification on the specific processes associated with industrial hemp research. NERA notes that NIFA issued a legal statement on the principles of research on industrial hemp as it related to the 2014 Farm Bill. We encourage NIFA to provide legal guidance on industrial hemp research relative to the 2018 Farm Bill.

These comments are submitted by Dr. Richard C. Rhodes III, Executive Director, NERA.