

I am writing on behalf of the membership of the Association of Research Directors (ARD) in response to your call for stakeholder input on the development of new Rules and Regulations for the 1890 Capacity Building Grants Program (CBG). The ARD includes representation from both research and academic programs and is a professional embodiment of the food and agricultural sciences in its broadest sense on our campuses. The association has strong ties to its stakeholders, particularly to students, farmers (particularly limited resource farmers), Agri-industry, environmentalists and both rural and urban communities.

As an 1890 family, the inclusion of Extension in Capacity Building Grant funding is recognized as extremely beneficial to the programs we provide for 1890 stakeholders and is in line with NIFA thrusts in priority funding for integrated programming. However, to set the stage for some of the recommendations that follow, the chart below will strikingly display how funding breakdowns from the past have greatly eroded effective funding for research when the decision was made to make equal allocations to both teaching and research as the CBG program was developing. Initially, research was primarily the area for which the Capacity Building Grants program funding was expected to be used to assist the 1890s in becoming more competitive and thus able to move to other competitive programs as a strengthened USDA partner. Without diminishing the value of teaching and extension activities on our campuses, it is important to recognize that research requires significantly higher investments in terms of equipment and specialized human capital before our institutions can be competitive. With so few research proposals being funded annually because of the funding distribution, only minimum research capacity building could be achieved through CBG funding. As is well known, 1890 institutions are clearly disadvantaged in terms of research resources as compared to 1862 counterparts. Yet it is expected that the 1890s not only build quality research programs but strengthen them as science advances. Thus, the greatest need for capacity building on the 1890 campuses remains in research in the food and agricultural sciences. It would be from this growth that both academic and extension programs could advance. This should be factored strongly into consideration in terms of funding distribution within the CBG program. We therefore urge caution when attempting to apportion funding based on equal percentages to research, teaching and extension when, as seen below, such an apportionment has not worked well.

CBG funding results as related to the funds being equally divided between research and teaching:

| Year | Proposals Received | Total Awards Made (success rate) | Teaching Proposals Received (percent submitted) | Teaching Awards Made | Research Proposals Received (percent Submitted) | Research Awards Made | Appropriated Funds Millions |
|------|--------------------|----------------------------------|---|----------------------|---|----------------------|-----------------------------|
| 2008 | 111* | 44 (37%) | 41 (37%) | 27 (66%) | 70 (63%) | 17 (24%) | \$13.56 |
| 2007 | 201 | 46 (23%) | 69 (34%) | 29 (42%) | 132(66%) | 17 (13%) | \$12.30 |
| 2006 | 195 | 44 (23%) | 58 (30%) | 28 (48%) | 137(70%) | 16 (12%) | \$12.30 |
| 2005 | 184 | 44 (24%) | 54 (29%) | 26 (48%) | 130(71%) | 18 (14%) | \$12.30 |
| 2004 | 176 | 47 (27%) | 58 (33%) | 28 (48%) | 118(67%) | 19 (16%) | \$11.40 |
| 2003 | 172 | 46 (27%) | 55 (32%) | 28 (51%) | 117(68%) | 18 (15%) | \$11.40 |
| 2002 | 147 | 41 (28%) | 47 (32%) | 24 (51%) | 99 (67%) | 17 (17%) | \$9.48 |

*Number of proposals submitted was limited to 8 per campus

The data in the chart reveal that because of the stipulation that 50% of the CBG funding be made available for teaching and 50% of the funds be allocated to research, substantial inroads to building capacity in research through this program have not been realized. The need has been in research as is evidenced by the number of proposals submitted for research (\$300,000 maximum funding) versus substantially fewer submissions of teaching proposals (\$200,000 maximum funding). This has led to higher quality research proposals being recommended for funding but funds had been depleted before the cut-off was realized. Yet, teaching proposals were funded that were not as high in quality as those of research because more funding was available for teaching. Thus the ARD is recommending a funding strategy to fund the highest quality proposals as is the goal of competition, which will be delineated at the end of this communication.

The following are additional requests:

1. The ARD is requesting that the Federal Cooperator requirement for CBG proposals be removed. The intent of such a requirement had been to assist in establishing partnerships and support from USDA agencies for 1890 initiatives. However, the 1890s have evolved to establish partnerships not only with numerous federal partners, but with private and public entities as well. Thus, such a requirement is no longer necessary since partnerships will remain a very high priority in developing initiatives within the food and agricultural sciences.
2. The ARD requests the requirement of an endorsement letter in submitted proposals from the 1890 Deans/Directors responsible for oversight of 1890 Capacity Building Grant programs. The food and agricultural sciences can be strengthened by programming outside of researchers and educators housed within these related departments, i.e. engineering, biology, chemistry, social sciences, etc. However, the proposals should be, according to the 1995 OIG Audit, submitted as “linking projects to institutions’ long – term goals and strategic plans.” Additionally, CSREES listed as a goal of the CBG program to “stimulate initiatives/activities that will strengthen the quality, depth, and breadth of an institution’s academic programs’ infrastructure in the food and agricultural sciences.” Additionally CBG programs are included in the required USDA Plan of Work for land grant universities. Thus, the letter of the dean/director will indicate knowledge of the proposal being submitted from the campus and within the letter of endorsement, the extent to which the initiative would advance the strategic plans and Plan of Work in the food and agricultural sciences. Without doing so, satellite initiatives could be funded without building capacity because of a lack of connectivity to the strategic plan, both short and long term in the food and agricultural sciences. The endorsement letter should be factored in as an evaluation criterion and assigned a numeric score in the review process.
3. In the revision of 7 CFR Ch. XXXIV (1-1-05 Edition) the ARD requests the removal of references to cost-sharing and matching, as well as the USDA agency cooperator requirement as discussed in #1 above.
4. Under definitions, a “joint project proposal means a project which will involve the applicant 1890 Institution and two or more colleges, junior colleges, or other institutions, each of which will assume a major role in the conduct of the proposed project, and for which the applicant institution will transfer at least one-half of the awarded funds to the other institutions participating in the project.” The definition goes on to say further that the “other institutions participating in a joint project proposal are not required to meet the definition of ‘1890 Institution’ as specified in this section, nor required to meet the definition of college or university as specified in the section.” Thus, it should be made clear that the partner need not be only an institution of higher education but could also be a public or private entity, such as a corporation, a small business, a community foundation, a public school system, etc. Additionally, the ARD requests the removal of the amount the partner must receive from the grant, but instead the grant should pay the fair and allowable costs for services/initiatives rendered as a viable partner. However, it is agreed

that at least a 30% share of the funding could serve as a minimum amount to be expected by a partner(s). Finally, the ARD is adverse to requiring a minimum of three partners for a joint project. Considering the challenges of coordinating partnerships while realizing the tremendous benefits partnerships confer, the ARD requests that a partnership be construed as the minimum of two, not three partners, which means the 1890 and another entity. However, it is realized that proposals with multiple partners would be more readily fundable than only two and thus it is advisable to have multiple partners to increase the likelihood of funding.

5. The ARD requests the removal of the requirement that all teaching projects be mandated to offer academic credits. Very commendable experiential learning opportunities are awarded students that are not a part of a specific course for credit. Some teaching initiatives are related to recruitment and retention, some are for faculty development, etc. The rigors of university approval for academic credit may well be out of the confines of a CBG. Thus, these examples explain the request to remove this requirement.
6. Stipulations were placed on the 1890s as to how many proposals could be approved for an investigator at an institution who would serve as the principal investigator. Such things as time and effort that do not exceed 100% are allowable by the federal government. However, the universities should make their own decisions in terms of the time and effort of its employees on grants. Therefore as long as the investigator is not negligent in submitting final reports for funded grants, CBG officials should not dictate for the 1890 university who can submit proposals from their campuses. These decisions should be made by the campuses themselves.
7. By policy, CSREES requires that peer review panels reflect the diversity of stakeholders. In this regard, the 1890s have not had the benefit of having those from the 1890s serve on CBG panels. Years ago such an omission from the panels would have been understandable as the 1890 programs were small and conflict of interest would be commonplace. However, the 1890s have grown tremendously and are as unfamiliar with cohorts at their sister institutions today as the 1862s are with cohorts at 1862 campuses. Yet as the 1862s are familiar with the strengths, challenges and unique attributes of their sister institutions, so are the 1890s. Therefore, putting in place the guidelines for conflict of interest, the ARD requests that the CBG peer panels be constituted with a minimum of 25% of reviewers from the 1890 institutions.
8. The last CBG funding cycle utilized the following as priority areas:
 - a. Human Health and Obesity
 - b. Bio-energy Fuel
 - c. Food Safety
 - d. Water Quality
 - e. Ag. Bio-Security (it is assumed that this area includes food safety)

The ARD concurs with the priorities listed above and will annually submit for consideration other priority areas to be considered after careful deliberation among the 1890 community. However, for the next cycle, which would include Extension, the ARD would suggest also including:

- f. Youth Development
- g. Family Financial Stability
- h. Parenting Education

The above three areas were suggested as focus areas by Extension as revealed in a previous meeting. The other areas Extension recommended, Ag. Sustainability/Small Scale Agriculture, Economic and Community Development would fit in the CSREES previous category of General Food and Agriculture proposals.

9. Besides the regular research and teaching proposals and the joint/partnership proposals, CBG initiatives have also included other special program areas. The ARD suggests the following categories in addition to the traditional funding:
 - a. Integrated proposals of two or more of the following – research, teaching, extension. This is an extremely important new area that the ARD highly recommends.
 - b. Consortium-type proposals – must be integrated, have a minimum of five 1890s engaged, be funded at \$1 million or more, can be funded for 5 to 7 years. It is assumed that if consortium-type proposals become a possibility, this will be funded from a separate pool of CBG revenue, and not from the funding pool currently available for CBG proposals.
 - c. Planning grant proposals -- to develop partnership or consortium initiatives for either CBG or AFRI-type funding as well as for USDA mandatory programs like the Specialty Crop Research Initiative.
 - d. Professional development proposals for administrators, researchers, extension professionals and faculty (This could also include the efforts of CBG national program leaders to extend granting opportunities to new investigators and faculty)
10. During the last funding cycle, the 1890s were limited to submitting no more than eight proposals per campus. It is recommended that this limitation be extended to twelve proposals per campus since Extension can now submit proposals as well.
11. Finally, as a result of the severe disadvantage research funding has witnessed because of the 50:50 ratio of funding for research and teaching as shown in the chart provided earlier, the ARD proposes the following breakdown in funding:

There be no breakdown in funds awarded according to teaching, research and extension other than that the three highest scored proposals in research, teaching and extension be funded. After the funding for these nine initiatives is taken off the top, the breakdown would be as follows:

20% awarded to the priority areas designated in #8 with the highest rankings (teaching, research or extension), 30% be awarded to either multistate, integrated or partnership proposals with the highest rankings (teaching, research or extension as the leading unit), 40% be awarded to general food and agricultural sciences proposals with the highest rankings (teaching, research or extension), 10% awarded for those proposals ranked highest in the categories of planning grants or professional development. On behalf of the ARD, I express utmost appreciation for the opportunity to provide stakeholder input.. Please contact me, mcmeanso@wvstateu.edu, if there is further information is warranted. I can also be reached by phone at 304-766-4291.

Sincerely,

Orlando McMeans, Chair of ARD