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**TO:** Doug Steele, Vice President, Food, Agriculture and Natural Resources, APLU

**FROM:** Rick Rhodes, Executive Director, NERA

**DATE:** April 9, 2019

- **RE:** Match, Indirect Cost Return, and NIFA Grant Opportunities
- CC: NERA

I'm writing on behalf of NERA to share our concern with the loss of the match waiver in the big-ticket grant programs like the Specialty Crops Research Initiative (SCRI). I'd also share that NERA has forwarded a similar note to Deb Hamernik to share with ESCOP.

The loss of the match waiver was a big miss during the push to move the 2018 Farm Bill from conference to law. NERA finds the explanation shared by Cornerstone to be unfulfilling. Cornerstone noted that they sought input from the Committee on Legislation and Policy and that committee did not value the match waiver. Clearly, that committee was not speaking in the best interests of NERA nor do we believe the committee was acting in the best interests of the Experiment Station Section. While we understand that the National Sustainable Agricultural Coalition (NSAC) lobbied against the match waiver, is it possible that a small organization like NSAC could wield such weight toward such an ill-conceived end shrouded in the banner of leveling the playing field?

NERA recommends to you to share with the BAA Policy Board of Directors, as we have recommended to ESCOP, that the system include in our advocacy efforts the following positions:

- Elimination of the required 1:1 match for grant programs funded through NIFA including:
  - o Alfalfa and Forage Research
  - o Aquaculture Research
  - o Biotechnology Risk Assessment Grants Program
  - Community Food Projects Program
  - Crop Protection and Pest Management
  - o Farm Business Management and Benchmarking
  - o Food Insecurity Nutrition Incentives Program
  - o Hispanic Serving Institutions Education Grants Program
  - o IR-4 Minor Crop Pest Management
  - o Methyl Bromide Transitions Program
  - o Organic Agriculture Research and Extension Initiative
  - Organic Transitions Program
  - o Potato Research

- Secondary Education, and 2-Yr Postsecondary Education/Agriculture in the K-12 Classroom Challenge Grants
- Specialty Crop Research Initiative
- Sun Grants
- o Supplemental and Alternative Crops
- National Integrated Water Quality Program
- Women and Minorities in Science, Technology, Engineering and Mathematics Fields
- If the required 1:1 match cannot be eliminated, then we support the language of the 2014 Farm Bill that provided a waiver of match to Land-grant universities applying for grants in cost-sharing required, grant programs. In short, NERA supports rejecting the language of the 2018 Farm Bill that rescinded the match waiver to Land-grant universities applying to match-requiring, grant programs.
- If match cannot be eliminated, NERA supports the use of unrecovered indirect cost return (institutional rate capped ICR) as a means to meet match requirements, allowable by the CFR (see CFR § 200.306. Cost sharing or matching. "(c) Unrecovered indirect costs, including indirect costs on cost sharing or matching may be included as part of cost sharing or matching only with the prior approval of the Federal awarding agency. Unrecovered indirect cost means the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the non-Federal entity's approved negotiated indirect cost rate."



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CC: NERA; Jeff Jacobsen, Executive Vice-chair, ESCOP

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