

Questions Regarding RCDG RFA

NCBA is endeavoring to provide the best information possible given the short timeline of the RFA. For those answers that indicate that NCBA is providing the information, answers are provided based on research on Rural Development and NIFA documents, as well as conversations with knowledgeable stakeholders. With that said, these answers are not endorsed by any U.S. Government entity, nor should they be understood as authoritative.

General

1. When will the awards be announced?

- a. NIFA Answers: Awards will be announced before September 30.

2. What are the requirements for 15 pages of application material?

- a. NIFA Answers: The 15-page limit is strictly for the application materials requested as aligns with the RFA and evaluation criteria. There is an opportunity to provide supplemental materials without a page or character limit in field 12. If information is duplicative, it should be viewed in the narrative as a scope and supplementary information should detail additional justifications.

3. Please confirm that we are correctly interpreting that all the elements listed on page 12 of the RFA must be included in 15 pages, plus 5 pages of tables, even if duplicative of other required submissions (e.g. title page, summary of proposal, bio sketches of key personnel).

- a. NIFA Answers: Other Personnel Biographies can be included in field 12 for other attachments. Information included in the 15 pages should align with the evaluation criteria as it is not provided elsewhere or expanded on any of the requested form fields. There is no page limit for supplemental material.

4. What counts towards the page limit?

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5. Who is scoring the applications?

- a. NCBA CLUSA Answers: Current RD staff, though NIFA will give the OK. There are proposals to have former RD staff review. The Secretary's Office will also need to sign off.

6. Can a center billing rate be included in the budget, or should personnel be based on salary as in the budget form?

- a. Budget information should be included as requested in the budget forms and any additional information provided in the budget should be included and justified with supplementary material.

7. Are letters of support required/requested?

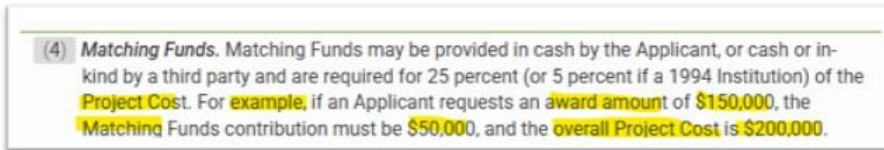
- a. NCBA CLUSA Answers: No letters of support from clients. It was removed by RBCS in the 2024 regulations. Notably, the NIFA application guide wants letters from any collaborators/partners in the “other attachments” section pg. 44-45.
- 8. What is the reason behind 15 awards being anticipated? Is that an estimate given the timeline or a hard and fast rule?**
 - a. NIFA Answers: This is an estimation given the timeline of the application. No cap of 15 exists. The RFA details a larger award threshold with national and regional collaboration. The goal is to get all the funding obligated.
- 9. What constitutes a conflict of interest in our context? It would be helpful to determine who qualifies as a "collaborator" or "persons with whom they have had a consulting/financial arrangement" that would require COI disclosure.**
 - a. NIFA considers them a person spending a significant portion of time and salary implementing the project. If their role is indirect, or they are a sub awardee, then they aren't considered key personnel. In the budget narrative, other CDO personnel working on the project and any adjustments needed will be identified by NIFA staff once the program is recommended for an award. For those other CDO staff, their biographies can be included in field 12 for other attachments in the budget narrative which has no page limit on supplemental materials.

For the COI forms and how to identify Collaborators, NIFA told us that COIs are for competitive awards to ensure reviewers of applications haven't worked closely with potential applicants. Guidance is to use the narrowest definition of collaborators, and that will suffice.

- 10. How will NIFA administer the RFP and RCDG statutory language that allows for Center operations costs to be dealt with as direct costs, not indirect costs?**
 - a. NCBA Answers: The program regulations and allowable uses of grant and matching funds may be found here ([7 CFR 4284.525\(a\)](#)) as referenced on page 19 of the RFA. Allowable uses include Costs associated with establishing or operating a Center, including legal services, accounting services, clerical assistance, technical services, office supplies, hiring employees, monitoring contracts, professional development for staff, attending conferences that would advance Cooperative Development and its practice, and Board travel.

[Page 50-62 of the NIFA grants application guide](#) details the breakdown between direct/indirect costs. Direct costs include salaries of project personnel proportionate project effort, fringe benefits dependent on the grantees usual accounting practices, equipment, travel, participant/trainee support costs, materials, publications, consultant services, and IT services. Salaries of administrative/clerical staff are typically treated as an indirect cost by NIFA, however, may be included as a direct cost with a clear description of circumstances to be treated as a direct cost in the budget justification.

- 11. 25% of total award amount applied for or amount total including the match?**
 - a. NCBA CLUSA Answers: NIFA will check on this.
 - b. NIFA Answers: Match is calculated based on project cost (Federal award + match). See snippet from legislation, which includes an example:



Personnel

12. Conflict of interest form - do you need it and who should be on it?

- a. For the COI forms and how to identify Collaborators, NIFA told us that COIs are for competitive awards to ensure reviewers of applications haven't worked closely with potential applicants. Basically, the guidance is to use the narrowest definition of collaborators and that will suffice.

13. The other "Project Role" categories on the R&R Budget form are designed for academic projects. If development staff are not "Senior/Key Persons," then should their aggregated (FTE equivalent?) salaries be included under the single blank space under "Other Personnel"?

- a. Yes. For all other personnel, the NIFA grants application guide Page 52 States: For each project role category, identify the number of personnel proposed. This field is required.

14. Beyond the center leader/ED, who should be identified as a "Senior/Key Person" for purposes of completing the R&R Budget form (and for providing bio sketches and conflict of interest disclosures, etc.)? Should we include all employees who are providing TA or other services in the work plan, or only those with supervisory authority or reporting duties, or something else?

- a. NIFA considers them a person spending a significant portion of time and salary implementing the project. If their role is indirect, or they are a sub awardee, then they aren't considered key personnel. In the budget narrative, other CDO personnel working on the project and any adjustments needed will be identified by NIFA staff once the program is recommended for an award. For those other CDO staff, their biographies can be included in field 12 for other attachments in the budget narrative which has no page limit on supplemental materials.

For the COI forms and how to identify Collaborators, NIFA told us that COIs are for competitive awards to ensure reviewers of applications haven't worked closely with potential applicants. Guidance is to use the narrowest definition of collaborators, and that will suffice.

15. How should we complete the salary portion of the R&R Budget form if the Senior/Key Person's salary (or anyone else's) is only partially paid by RCDG funds?

- a. NCBA Answers: The NIFA Grants Application Guide Page 51 provides the following guidance on Salary: "Regardless of the number of months being devoted to the project, indicate only the amount of salary being requested for this budget period for each senior/key person. This field is required."

16. The suggested sample conflict of interest form is geared toward academic research projects rather than people delivering cooperative development service. Guidance on what constitutes a conflict of interest in our context would be helpful to determine who

qualifies as a "collaborator" or "persons with whom have had a consulting/financial arrangement" that would require COI disclosure.

- a. NCBA Answers: The NIFA Grants Application Guide Page 80 states COI list is required for Senior/Key Person included in the R&R profile. Other individuals working in the applicant's specific area are not in conflict of interest with the applicant unless those individuals fall within one of the listed categories. The Program Contact must be informed of any additional conflicts of interest that arise after the application is submitted.

17. Do Key Persons of sub awardees need to complete conflicts of interest forms?

- a. NCBA Answers: A Conflict of Interest (COI) list is required for each Senior/Key Person included in the R&R Senior/Key Person profile. Other individuals working in the applicant's specific area are not in conflict of interest with the applicant unless those individuals fall within one of the listed categories. The Program Contact must be informed of any additional conflicts of interest that arise after the application is submitted.

18. The other "Project Role" categories on the R&R Budget form are designed for academic projects. If development staff are not "Senior/Key Persons," then should their aggregated (FTE equivalent?) salaries be included under the single blank space under "Other Personnel"?

- a. NCBA Answers: Yes. For all other personnel, the NIFA grants application guide Page 52 States: For each project role category, identify the number of personnel proposed. This field is required.

19. Can the "Investigator" role be the same as the senior personnel?

- a. NCBA Answers: NIFA identifies key personnel to include the Project Director/Principal Investigator (PD/PI). PD/PI is the individual(s) a research organization designates as having an appropriate level of authority and responsibility for the proper conduct of the project, including the appropriate use of funds and administrative requirements such as the submission of progress reports to the agency. The RCDG regulations define key

The RFA states applicants will be evaluated on Key Personnel as follows.

- Up to 5 points will be awarded if the application identifies the Key Personnel associated with each task.
- Qualifications of Key Personnel (Up to 10 points).

20. Beyond the center leader/ED, who should be identified as a "Senior/Key Person" for purposes of completing the R&R Budget form (and for providing bio sketches and conflict of interest disclosures, etc.)? Should we include all employees who are providing TA or other services in the workplan, or only those with supervisory authority or reporting duties, or something else?

- a. NCBA Answers: NIFA identifies key personnel to include the Project Director/Principal Investigator (PD/PI). PD/PI is the individual(s) a research organization designates as having an appropriate level of authority and responsibility for the proper conduct of the project, including the appropriate use of funds and administrative requirements such as the submission of progress reports to the agency. The RCDG regulations define key

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Language

21. What is meant by “regional” and “multi-regional”? Applicant defined or metrics decided by NIFA?

- a. NIFA Answers: There is no consistent definition across USDA, including at NIFA. Provides potential applicants with the opportunity to self-define region the project will cover with justification in the application.

22. What is meant by “new application? Never applied through NIFA, RCDG, any federal Program? As an application not previously submitted, does this mean even if they were not previously awarded and how far back?

- a. NIFA Answers: New application means the same application previously submitted to NIFA.

23. “Preference will be given to applications that provide for the establishment of Centers” (pg. 6). Does this mean that only new centers can apply? How does that match with the experience and following criteria.

- a. NIFA Answers: No. Thought it was legacy language from previous notices. Existing centers can apply.

24. Can you define “persistent poverty” and address how it will be scored? How does an application retain points for Economically Distressed and Underserved?

- a. NIFA Answers: Scoring will focus on persistent poverty counties and follow historical methodology
- i. Definition of persistent poverty as follows: Persistent poverty counties are defined in Section 736 as “any county that has had 20 percent or more of its population living in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses, and 2007–2011 American Community Survey 5-year average, or any territory or possession of the United States.” The eligible population in persistent poverty counties includes any county seat of any persistent poverty county that has a population that does not exceed the authorized population limit by more than 10 percent. This provision expanded the current 50,000 population limit to 55,000 for only county seats located in persistent poverty counties.

25. All applications submitted, regardless of the Applicant entity name, that include the same Executive Director, employees, Board, advisory boards or committees of an existing Center or a majority thereof will be determined ineligible for funding.” - (end of IIIA) It is assumed that they were trying to clarify the preceding sentence about only submitting one application per organization; however, the wording does make it sound that existing Centers are ineligible for funding. Can this be clarified?

- a. NIFA Answers: The intent is to make sure one applicant isn’t applying under 2 different names. Existing centers are eligible.

Focus on Sectors

26. Would including housing, education programs and so forth be topics that will be lower points?

- a. NIFA Answers: The evaluation criteria are the only point of consideration for the review panel. Focus on the evaluation criteria and scoring categories.
- b. NCBA Answers: Manufactured Housing Cooperatives/Resident Owned Communities MHAs are excluded. The rest is currently TBD, but preferences will be for jobs in the RFA. USDA has been focused on farmers-first policies. Competitive applications meet the priorities of the department and the evaluation criteria.

27. The Project must focus on establishing or operating a Center with the goals of creating jobs in Rural Areas through the development of new Rural Cooperatives, Value-Added processing, and Rural businesses. In the past, applications never included all 3. Do you have to do all 3?

- a. NIFA Answers: No, the project scope just needs to align with the evaluation criteria.

28. Are the details on persistent poverty counties the only criteria for Underserved and Economically Distressed areas?

- a. NIFA Answers: Persistent poverty as defined in the RFA is the criteria for underserved and economically distressed. Potential applicants should identify the persistent poverty counties within the scope of the project.

29. Is there more emphasis on F and A than before? Or is it still rural communities and businesses broadly?

- a. NCBA CLUSA Answers: MHAs are excluded. The rest is currently TBD, but preferences will be for jobs in the RFA. USDA has been focused on farmers first policies. Competitive applications meet the priorities of the department and the evaluation criteria.
- b. NIFA Answers: The evaluation criteria is the only point of consideration for the review panel. Focus on the evaluation criteria and scoring categories.

30. Is the emphasis on job creation heavier than in the past?

- a. There is more emphasis on jobs in general. From the RFA: In accordance with EO 14278 and America's Talent Strategy, preference will be given to applications that demonstrate the ability to assist businesses in training, hiring, and retaining a skilled workforce, leveraging the full range of educational and community partners towards this goal (pg. 6).
- b. NIFA Answers: "Ability to create and save jobs including by training a skilled workforce, that improve economic conditions of Rural Areas" will be evaluated as 5/115 points. More consideration to National and Regional in scope.

31. Manufactured housing project awards are disallowed. Is this covered under HUD funding now?

- a. NCBA CLUSA Answers: Yes, the PRICE Fund is the primary existing

Subawards, Subcontracts, and Multi-Center Applications

32. Is a subcontract or sub award needed if we are doing a fee for service for a one-time training?

- a. Sub awardees are carrying out programmatic level tasks (i.e. working with other centers) and contractors are doing something very specific.

33. Can a center/org be on a subcontract on multiple proposals submitted by different lead orgs?

- a. NCBA Answers: Including greater than 50% subaward in the budget would not be disqualifying to include in the application as long as it's detailed in the budgets and budget justifications for sub awardees. There's precedent for regional and national collaboration. Sub awardees would be responsible for providing the budget justification. Sub awardees carry out programmatic level tasks (i.e. working with other centers) and contractors are doing something very specific (i.e. tech support services, AV audio, one-time training, etc.)

Subrecipient. Subrecipient means an entity, usually but not limited to non-Federal entities that receives a subaward from a pass-through entity to carry out part of a federal award; but does not include an individual that is a beneficiary of such award. A subrecipient may also be a recipient of other Federal awards directly from a federal awarding agency (2 CFR 200.1)

34. Can a lead applicant also be on a subcontract of another applicant's grant?

- a. NIFA Answers: An entity can be a sub-awardee on multiple applications, and a prime on others. The evaluation criteria require collaboration and shared services. The staff of a center cannot be the lead applicants on multiple applications. Funding should be for different sectors' activities.

35. For matching funds, if multiple centers collaborate on the same application can all of the centers contribute to the match or only the prime applicant?

- a. NIFA Answers: Yes, all centers can contribute to the match.

36. Can you confirm that key personnel partners need to be included as key personnel for the application?

- a. NIFA Answers: If one center would apply and those centers would be listed as sub-awardees, then sub-awardees don't need to be listed as key personnel.

37. Would being a sub-awardee on multiple applications, or a primary on one and a sub-awardee on another, be disqualifying? In other words, does each Center need to have its name on only one application?

- a. NIFA Answers: An entity can be a sub-awardee on multiple applications, and a prime on others. The evaluation criteria require collaboration and shared services. The staff of a center cannot be the lead applicants on multiple applications. Funding should be for different sectors' activities.

38. Can we get permission from a NIFA program officer for subawards with more than 50% (RFA p20)

- a. NIFA Answers: As noted on pages 67 and 68 on the [NIFA Application Guide \(V.170 R&R Subaward \(Fed/Non-Fed\) Budget Attachment\(s\) Form](#)), exceeding 50% requires additional information to be included in the application. If the proposal is recommended for funding, NIFA will closely review all budget information. Once the proposal is awarded, prior approval has been granted.

39. If you are a sub-awardee, can you only be on one application?

- a. NIFA Answers: No, sub-awardees can be on multiple applications.

40. Do they distinguish between subcontracts and subawards?

- a. NIFA Answers: From the [NIFA Federal Assistance Guide](#).

Subaward. Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract (2 CFR 200.1).

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41. Would it be sufficient to mention participation in multi-regional approach of other Center without repeating the workplan in the applications of collaborators?

a. NIFA Answers: Yes.

42. In each of the above situations 1 Center holds a multi-regional project; is one project enough?

a. NIFA Answers: Yes, if they justify regional collaboration.