

CDFA- Beginning Farmer and Farmworker Training and Workforce Development (BFFTP) Grant Program Summary of Public Comments and CDFA Responses

Topic	Comment/ Question	CDFA Response
Grant Administration	<p>Indirect Cost Policy- A comment was received stating the “basic rate of 10% is too low for any organization” & also acknowledging that allowing organizations to use their negotiated federal rates can be expensive for a grant program. The comment suggested that “rather than give some larger organizations a lot of money and others very little, we recommend that the basic rate be 15 or 20% and the federal rates not be used.”</p> <p>This comment was submitted in writing by David Runsten, Senior Poly Analyst for the Community Alliance with Family Farmers (CAFF).</p>	<p>CDFA recognizes the need for flexibility in indirect rates. In line with other CDFA programs targeting underserved and small-scale organizations, CDFA will accept an indirect cost rate for all applicants of up to 30% for this grant program.</p>
	<p>Application Period- A comment was submitted deterring the receipt of applications on a rolling basis as “this type of structure prioritizes organizations or groups that are well-resourced and can submit their application early.”</p> <p>This comment was submitted in writing by David Runsten from CAFF, and further emphasized during the live comment session on April 19th, by Jamie Fanous, Senior Policy Advocate & Organizer (CAFF).</p>	<p>An application term will be set and remain open for 60 days to allow enough time for organizations to develop partnerships and project planning. CDFA will not have a rolling application/ “first come first served” model for this grant program.</p>

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<p>Accountability & Transparency</p>	<p>Grant Program Metrics- A comment was received on the use of specific metrics on program enrollment, participant demographics, and budget categories to ensure accountability, support, and compliance of the Farmer Equity Act (AB 1348)</p> <p>This comment was submitted in writing by Rev. Roosevelt Tarlesson, Executive Director of the National Economic and Social Development Action Committee (NESDAC).</p>	<p>CDFA will build in these metrics into the BFFTP program reporting & evaluation section of the application.</p>
<p>Farmworker Training and/or Workforce Development (Track 3)</p>	<p>Alignment with Existing Federal Farmworker Programs- A comment was received asking “How does this program address needs that those federal programs such as the Department of Labor and EDD funds do not?” The CDFA should be more specific as to how the BFFTP grant program would complement and not duplicate farmworker training and workforce development programs already on the ground and funded through these agencies.</p> <p>This comment was submitted in writing by David Runsten, Senior Poly Analyst for the Community Alliance with Family Farmers (CAFF).</p>	<p>In the grant application, CDFA will specify that funding for projects under Track 3 can complement, and not duplicate services being offered through other sources of funding. For this grant, funds will: 1) Benefit a farmworker labor force that is currently not eligible for training and workforce development Federal Department of Labor programs, and/or programs funded through Section 167 of the Workforce Investment Act (WIA) and National Farmworker Jobs Program (NFJP) and, 2) Provide training and/or enhancement of agricultural skills exclusively and allow trainees to transition to a higher skilled job with higher earnings. Other types of trainings might include new ag technology or mechanical systems, certification in integrated pest management (IPM), food safety, or other ag-centered certification programs, training in organic system management or practices, irrigation systems and technology or, industry-specific skills training such as vineyard management.</p>

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<p>Definitions</p>	<p>Beginning Farmer and Rancher (BFR) Definition- A comment was received asking the CDFA to “ensure that the (BFFTP) program be free of the restrictive conditions around Beginning Farmer and Rancher loan funding from the federal Farm Service Agency”, citing the fact that the USDA FSA beginning farmer loan program requires 3 years of managerial experience from applicants in order to qualify for funding, something that is “historically prohibitive for farmers of color.”</p> <p>This comment was submitted in writing by the California Farmer Justice Collaborative (CFJC).</p>	<p>The CDFA will not establish this, or any other limitation for BFR’s under the new BFFTP, other than individuals be operating a farm or agricultural business for 10 years or less. The CDFA will review the current definition of BFR’s in the draft RFA and ensure the clarification on the definition of a BFR at the state level is clearly defined as above.</p> <p>Although the BFFTP will not be open for individuals to apply, organizations applying under Track 2, Beginning Farmer Training Program Development wishing to make funding available to their program participants through grants or stipends will have full discretion and responsibility in establishing their own eligibility guidelines for their programs and ensuring they are not prohibitive for farmers to apply.</p>
	<p>Socially Disadvantaged Farmer and Rancher (SDFR) Definition - A comment was submitted referencing the California Farmer Justice Collaborative’s work in the creation of the definition of “Socially Disadvantaged Farmer and Rancher within the CA Food and Ag Code for the expressed reason to see its use and reference in state funding programs, policies, and guidelines” to advance farmer equity. The comment further states the use of this definition “ties us clearly to the state definition of socially disadvantaged farmer that we created through the passage of AB 1348.”</p> <p>This comment was submitted in writing by the CFJC.</p>	<p>The CDFA acknowledges the importance of using the formal definition of SDFR as it appears in the Farmer Equity Act (AB 1348). As corrective action, CDFA will be removing the term “historically underserved” from the BFFTP draft RFA and will be using SDFR when referencing this group moving forward.</p>

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<p>Ensuring Access to USDA Loan Programs</p>	<p>3-year managerial farm experience- A comment was received stating that since the USDA has an established “3-year requirement and qualifications for Beginning Farmer and Rancher’s farm ownership loan (FOL) financing” through the Farm Service Agency, applicant organizations to CDFA’s BFFTP, Funding Track 2- Beginning Farmer Training Program should consider implementing training programs that will allow participants to meet the 3 year minimum farm managerial experience requirement and thus, permitting them to apply to the FSA beginning farmer loan program after completing the training program funded through this grant.</p> <p>This comment was submitted in writing by Rev. Roosevelt Tarlesson, with the NESDAC and also supported through an additional comment in writing from the CFJC.</p>	<p>CDFA will build additional questions into the application to ensure that training programs will bridge the 3-year requirement to access USDA beginning farmer/rancher land loans, ensuring they are training farmers to be eligible for FSA loans. The BFFTP program will have two solicitations, thus allowing a grant project to be implemented over a period of three or four years.</p>
<p>BFFTP Project Review Committee</p>	<p>Technical Review Committee- A comment was received to include at least 1-2 external reviewers who are farmers of color (Black, Indigenous, and People of Color- BIPOC). These individuals should be a part of the BFFTP project reviewing process, as “farmers of color deserve a place at the review table for these grants and in decision-making for any grant programs that will go to change the landscape of land, training, and market access for our communities.”</p> <p>This comment was submitted in writing by the CFJC.</p>	<p>The CDFA considers the importance of inclusive and balanced technical review committees for its grant programs. CDFA will have a 4-member external review committee for this grant program. The review committee will consist of 1 BIPOC farmer or member of CDFA’s BIPOC farmer advisory committee, 1 representative from Department of Labor (DOL), 1 representative from a farmworker serving organization and 1 representative from a beginning farmer/rancher training program.</p>