

July 31, 2025

Dear Environmental Farming Act Science Advisory Panel Members,

On July 21, 2025, I received a letter from the Black, Indigenous and People of Color (BIPOC) Producer Advisory Committee (Committee) with feedback on the block grant application and administration processes. OARS will respond to this letter point by point as we develop our final RGAs and consider public comment, but I am including the letter in our agenda materials as background for you and the public when discussing the future program structure during our next meeting on August 15, 2025. I believe the letter can inform our discussion and initial draft of the solicitations early in the process.

At the request of Chair Dlott, I would like to provide a high-level response to general points made in the letter in advance of our next meeting and for your consideration during our discussion as your input will inform what we incorporate and how. The Committee organized the letter into seven parts, but I see some overlap in those issues so I have condensed them below.

One important shift in our administrative processes that is important for this response is differentiating our “Request for Grant Applications” (RGA) from our “Grant Award Procedures Manual” (GAP Manual). Traditionally, our RGA contained a lot of details about grant administration that was duplicated in the GAP Manual for successful awardees. In our new round of solicitations, we will be simplifying the RGA to focus on the program priorities and high-level guidance on what to expect as a grantee. Separately, we will prepare a GAP manual in consultation with CDFA’s Administrative Services Division and Farm Equity Office that will outline the grant management procedures and requirements to ensure we meet funding source requirements and maintain accountability for the funding and outcomes. I make this distinction to clarify that the RGA may not be the place to address all the issues identified by the Committee and I have labeled the sections below with where the Panel and Committee can expect to see these issues addressed.

The Solicitation Process for Block Grantees (RGA):

We intend to have a more rigorous solicitation process for Block Grant applicants based on lessons learned in our pilot program. This includes a new financial risk analysis and letters of support that demonstrate stakeholder and leadership support, as well as many

materials we have required all along, like resumes/CV's and plans for Socially Disadvantaged Farmer and Rancher (SDFR) engagement. We welcome input from the Panel, the Committee and the general public on specific outreach venues for the Block Grant solicitation, especially to touch regions and underserved populations that we did not serve in the previous solicitations.

The Standardization of Requirements of Block Grantees (GAP):

The purpose of the block grants was to serve regional needs, build local capacity and to bring fresh ideas into program administration. We have tried to balance top-down control with grantee creativity. We do plan to provide Block Grantees with more guardrails and templates this round based on our experience in where they needed the most assistance, but we do not believe it is in the best interests of this program to make this a uniform experience for producers across Block Grantees. For example, some areas with very high applicant pressure may opt for a rolling application system while other areas with lower applicant pressure may have capacity for a more labor-intensive competitive application system. It is particularly interesting that the Committee recommends a rolling application process as a standard since there is a long history of public comment citing the rolling application process as biased against lower-resource producers. I welcome committee feedback on specific areas mentioned in the letter where standardization is beneficial to the program.

Fund administrators- whether CDFA or the block grantee- assess the opportunity for advanced payment based on need and performance. In the end, fund administrators are accountable for how advanced payments are spent. It is our goal to feel confident offering advanced payments to all Block Grant awardees, and to have a Block Grant awardee feel that they have the capacity, tools and support to confidently offer advances to producers while minimizing their own financial risk. Thanks to [recent legislation](#) and subsequent updates to CDFA's grant regulations, we have a clear process for requesting, justifying and approving advance payments to CDFA's awardees.

Program Assessment (RGA and GAP):

We wholeheartedly agree with the Committee that we need a more rigorous process to assess Block Grantee success and that having no direct contact with producer subrecipients is a blind spot for us. We have always tracked basic metrics like farm acreage and SDFR service through all our solicitations since the implementation of the Farm Equity Act but lacked information technology capacity for more complicated

analyses of, for example, applicant recurrence. CDFA is onboarding a new grant management system and we hope that it will offer new opportunities for program data collection and analysis. We are making plans to survey subrecipients in the future, and the suggestions in the letter will be helpful for developing these surveys. Additionally, we will ask block grant applicants to clearly identify goals and metrics for the incentive grant and technical assistance parts of their projects, and if awarded, CDFA will require them to track and report on those metrics during their project in addition to baseline data CDFA requires (like producer demographics).

We also agree that the results of Block Grantee performance on issues like SDFR engagement should be public. Current SWEEP and HSP Block Grantees have nearly finished selecting their on-farm projects and we look forward to analyzing the data and bringing an analysis forward to the Panel next quarter.

Complaint Processes (Separate from RGA and GAP):

There is a final comment in the letter about anonymous feedback that I would appreciate discussing with the Committee to better understand. Whenever we can minimize risk of retaliation, I believe it is best to avoid fully anonymous feedback as it makes it difficult to understand the full context of a situation without sufficient detail or back and forth communication with the complainant and the accused. It's unclear to me from the letter what type of concerns would be addressed, but I will break down the possibilities here:

1. If the concern is with a Block Grantee engaged in unethical activity, CDFA Program Staff must be engaged in the investigation and subsequent grant management decisions. They can exert additional requirements on a grantee, modify a grant agreement, or cancel a grant. All programs have a generic e-mail address that we can better publicize on our website to make clear that it is an opportunity for feedback. Producers could report anonymously, and we could arrange for confidential phone calls.
2. If the concern is with the administration of the program by CDFA, the EFASAP Panel and periodic public comment process is the best venue for these broad issues because the Panel makes recommendations to the Secretary on program changes. All Panel members are Form 700 filers. If there is a concern with their conflicts of interest, members of the public can file a complaint with the Fair Political Practices Commission (FPPC).
3. If the concern is with a particular CDFA staff member involved in the administration of the Program, that complaint could come to me as the Director of the Office of



Agricultural Resilience and Sustainability or my supervisor, Secretary Karen Ross. I am also a Form 700 filer, as are all the senior scientific staff who manage the grant programs so members of the public could also take conflict of interest complaints to the FPPC.

OARS will respond to each comment in the letter as feedback is integrated into the upcoming RGAs, but I hope this brief response provides some context and grounds for discussion for the Panel to consider during our next meeting.

Sincerely,

Dr. Tawny Mata
Director, Office of Agricultural Resilience and Sustainability