

***Input provided by agInnovation. For questions regarding these recommendations, please contact Dr. Steve Lommel (slommel@ncsu.edu).***

- agInnovation recognizes and appreciates the statutory matching requirement and respectfully requests that USDA allow flexibility in both how the match is applied (including in-kind contributions, prior funds spent on facilities/feasibility studies, and multiple match sources) and when the nonfederal match must be fulfilled, to ensure maximum participation by institutions of varying size, capacity, and geographic location. Specifically, institutions should be permitted to fulfill matching contribution requirements by the end of the grant period rather than being required to identify the full match at the time of award, and USDA should allow grantees to request the Secretary's approval to extend the match payoff period beyond the award period when appropriate.

- Institutions matching more than the minimum match requirement should not receive preferential treatment over those that meet, but do not exceed, the required minimum.

- Parity in funding distribution should be assessed at the institutional level within regions, rather than based solely on aggregate state-level awards. If a single institution within a state or region receives multiple large awards, other institutions in that same region should not be disadvantaged. However, when funding within a state or region has been distributed broadly across multiple institutions, priority should shift toward underfunded states or regions to promote a more balanced national allocation of resources. To support this approach, regional infrastructure needs analyses—such as those provided in the updated 2021 *Gordian Report*—should be used to inform funding decisions. In addition, EPSCoR classifications may serve as a useful tool for prioritizing regions and institutions that have historically received fewer federal research investments.

- Funding decisions should consider the potential to support regional infrastructure projects that benefit multiple institutions within a defined geographic area by addressing shared needs and promoting collaboration and resource sharing across institutions and disciplines. At the same time, the evaluation process should recognize that regional infrastructure models may not be feasible for all institutions, and proposals should not be disadvantaged solely because such shared approaches are impractical in certain locations.

- Establish a strategic, well-defined data collection and analysis framework to track which institutions and

states apply for funding, their success rates, and the types of projects awarded. These data are essential for assessing program effectiveness and informing future funding and resource-allocation decisions. The data management plan should be applied retroactively to FY 2023 and FY 2024 applications and awards to ensure a complete and consistent program evaluation baseline. In addition to tracking applications, systematically collect data on institutions that choose not to apply and the reasons for non-participation. Understanding barriers to submission will help identify whether program design is unintentionally excluding institutions and inform adjustments to promote broader and geographically diverse participation. NIFA should also establish regular, structured opportunities—such as annual feedback mechanisms—for stakeholder input, particularly from LGUs. This feedback should be used to refine program rules and requirements, especially during the early years of implementation, to ensure the program evolves responsively and inclusively.

- Application deadlines should be carefully chosen to allow institutions adequate time and resources to prepare competitive applications without overlap or conflict. Application deadlines should avoid the summer months, when staffing and institutional capacity are often limited, to ensure institutions can fully leverage available expertise and submit high-quality proposals. NIFA should also develop additional resources, such as FAQs, hold webinars with Q&A sessions, and other helpful resources for prospective applicants.

- NIFA should proactively lead interagency partnerships—particularly with federal agencies that administer infrastructure funding programs and have complementary missions—to expand the overall pool of resources available for infrastructure investments. Coordinated, cross-agency collaboration would increase funding leverage and broaden institutional access to critical infrastructure support.

- NIFA should continue to allow project periods of at least 48 months and permit awards to be obligated in a single fiscal year while allowing funds to be drawn down and managed across multiple fiscal years to better align with project cash flow. Where feasible, applicants should also be allowed to request support that spans at least two funding cycles to mitigate cost escalation and ensure continuous progress on complex, multi-year construction projects.