

Centers of Excellence-Office of the Administrator
National Institute of Food and Agriculture
U.S. Department of Agriculture, Stop 2201
1400 Independence Avenue SW.
Washington, DC 20250-2201

July 31, 2014

Dear National Institute of Food and Agriculture:

Thank you for the opportunity to submit comments on the National Institute of Food and Agriculture's (NIFA) strategy to successfully implement Section 7214 of Public Law 113-79, the Agricultural Act of 2014, requiring NIFA to prioritize Centers of Excellence in the receipt of funding from its competitive research or extension programs.

In general, we are supportive of leveraging available resources for research, extension, and education activities relating to the food and agricultural sciences. Coordinating with public-private partners catalyzes applied research and development that is built on the insights, discoveries, and creation of new fundamental knowledge of federally supported basic research.

However, we have specific concerns about how the composition and prioritization of being identified as a Center of Excellence may affect the scientific merit proposal review process, duplicate Coordinated Agricultural Project (CAP) awards which already leverage partnerships and resources, and negatively impact early-career scientists.

We are concerned that without careful implementation, this provision could result in the erosion of NIFA's high-quality, merit-based peer review process, as well as a significant change in how competitive funding is awarded at NIFA.

The NIFA competitive research and extension programs, such as the Agriculture and Food Research Initiative (AFRI), advance fundamental agricultural sciences and support the development of agricultural approaches to addressing some of our most pressing societal challenges. An underlying strength of these programs, as with the extramural programs at other federal science agencies, is that grants are awarded on the basis of a proposal's merit, quality, and relevance.

We strongly encourage NIFA to continue to use scientific merit as the primary determining factor for awarding competitive grants. Award decisions should be driven by peer review of the ideas and goals proposed in each individual application, ensuring the best science gets funded, rather than the prioritization of select institutions over others. We propose that a Center of Excellence designation should only be applied after the scientific merit proposal review process.

The Centers of excellence should not result in the concentration of resources or be at the expense of other programs. NIFA should avoid any duplication of the CAP Grants which award support for large-scale multimillion dollar projects to promote collaboration, open communication, and the exchange of information; reduce duplication of effort; and coordinate activities among individuals, institutions, states, and regions. As you work to establish a process for creating Centers of Excellence, we urge NIFA to ensure this process is

also based on merit, identifies the best science, and should be open to all non-profit research institutions regardless of land-grant, public, or private status. In addition to the initial evaluation, institutions ultimately designated as Centers of Excellence should be required to undergo periodic evaluations to verify that criteria continue to be met and that the designation remains appropriate for the institution.

Furthermore, **the Centers of Excellence should support a robust innovation ecosystem that does not disenfranchise early-career scientists.** A Center of Excellence must have a strong plan for developing our future scientists (e.g. undergrads, grad students, postdocs, and junior faculty) with access to modern technology, mentoring and professional development services.

Thank you for your consideration and we look forward to working with you as you develop the NIFA Centers of Excellence that will support the food and agricultural scientific enterprise and a strong workforce of scientists.

Sincerely,

American Phytopathological Society

American Society for Microbiology

American Society of Agronomy

American Society of Plant Biologists

Association of Public and Land-grant Universities

Council on Food, Agricultural and Resource Economics

Crop Science Society of America

Entomological Society of America

Soil Science Society of America