Dear Dr. Ramaswamy,

As you know, on September 9, the National Research Council (NRC) released its findings and recommendations regarding the National Institute of Food and Agriculture’s (NIFA) Agriculture and Food Research Initiative (AFRI) in the report entitled *Spurring Innovation in Food and Agriculture: A Review of the USDA Agriculture and Food Research Initiative Program*.

As the largest organization in the world serving the professional and scientific needs of entomologists, the Entomological Society of America (ESA), applauds the NRC committee’s efforts and also appreciates the progress that has already been made under your leadership during the past two years in areas related to many of the report’s recommendations. ESA would like to offer input related to selected recommendations from the report, outlined below.

**NRC RECOMMENDATION 1:** “The United States should strengthen its public investment in competitive agricultural R&D to ensure that it continues its role of a global leader in the innovations and technologies that are needed to promote health and well-being and to feed growing worldwide populations sustainably.”

ESA applauds the report’s Conclusion 1, which stresses that inadequate funding prevents AFRI from meeting the current and future challenges facing agriculture. In Spring of 2014, ESA submitted testimony to House and Senate appropriators urging lawmakers to provide robust increases to AFRI in fiscal year (FY) 2015, and the Society continues to educate Congress on the importance of investment in federal agricultural research programs such as AFRI. In addition, as a member of coalitions such as the AFRI Coalition, ESA also continues to be an active participant in the community of organizations advocating in support of the AFRI program. In order to meet the legislatively mandated research priorities and pressing agriculture-related societal challenges, it is critical that AFRI receive the $700 million funding level that has been authorized in the 2008 and 2014 Farm Bills.

**NRC RECOMMENDATION 2:** “NIFA should simplify the AFRI program structure by realigning it to more clearly address its specific mission and mandates as defined in authorizing legislation. Simplification of program structure to focus on the six foundation priority areas would improve efficiency, effectiveness, and transparency.”

While ESA does not think major changes to the AFRI program structure are necessary, ESA encourages AFRI to regularly review the structure of its portfolio to ensure that it continues to fund the best, most meritorious, competitive project proposals. Flexible funding mechanisms that allow scientists in the
field to identify emerging areas of need and propose work in those areas are an important component to USDA’s ability to address the most imminent and pressing issues in agriculture.

**NRC Recommendation 2-A:** “To realign AFRI’s portfolio with its legislative mandate, NIFA should review its priority for fundamental research. That should include an emphasis on proposals that will generate fundamental knowledge to support novel technologies, provide platforms for extension and education, and educate the next generation of food and agricultural scientists.”

ESA’s diverse membership of researchers and practitioners benefits from AFRI’s mix of foundational and applied science funding mechanisms. As you consider the report’s recommendations, ESA urges a balance between basic and applied research, extension, and training, recognizing that AFRI plays a critical role in supporting all of these tracks.

**NRC Recommendation 2-B:** “As part of its realignment, AFRI should be simplified by eliminating the challenge-area program, and areas of research within the foundational program should be primarily investigator driven.”

In its current structure, AFRI identifies and prioritizes a number of specific societal challenge areas. ESA acknowledges the value of selecting some areas of focus in order to adequately address specific societal challenges. However, ESA is concerned about overly prescriptive and narrowly defined Requests for Applications (RFAs) in these topic areas. Furthermore, ESA supports the development of a more stable and consistent portfolio, ensuring that challenge areas are not offered sporadically, and AFRI applicants have time to plan future goals and projects.

**NRC Recommendation 2-C:** “AFRI should carefully examine the causes of the decline in the numbers of applicants, awardees, and trainees and adjust its grant programs to ensure that future generations of young scientists are not lost inadvertently from food and agriculture R&D because of funding policies.”

The Society is particularly concerned with the recent decline in applicants and the negative implications this trend could have on the next generation of agriculture R&D. In light of the report’s conclusions, ESA urges AFRI to investigate all potential factors contributing to this trend. Further inquiry will allow AFRI to ascertain the cause(s) and mitigate the negative trend on a programmatic level.

**NRC Recommendation 2-D:** “AFRI should consider eliminating CAP grants as a grant category and committing more resources to other grant types.”

ESA sees the value in allowing AFRI the ability to invest in strategically planned, large-scale, complex projects in specific circumstances that could particularly enable innovative advancements in the field. However, strategic planning and careful consideration of funding programs and current budgets will be necessary to help AFRI support both basic and applied research through large-scale and smaller awards, while not overextending future budgets.

**NRC RECOMMENDATION 3:** “AFRI should develop a strategic plan that identifies priorities for its overall program goals for meeting them and a framework for assessing the program’s progress.”
ESA appreciates the recent release of a NIFA Strategic Plan for 2014-2018. The plan is well-aligned with other recent USDA plans and is particularly noteworthy in its identification of specific metrics, goals, and desirable outcomes. ESA encourages continued engagement with the community on the implementation of the Strategic Plan, as well as the flexibility to make adjustments to the Plan as needed. The importance of tracking progress, measuring outcomes and impacts, and demonstrating the public value of NIFA and AFRI activities will be key to ensuring the long-term success of the program.

**NRC Recommendation 3-B:** “NIFA should form an AFRI Scientific Advisory Council that consists of members who represent the food and agricultural research, education, and extension professional communities.”

As AFRI continues to grow, ESA believes it would be incredibly beneficial to appoint a Scientific Advisory Committee to oversee the direction of AFRI and USDA research overall. The Committee should be composed of scientific experts from the broad agricultural science community, and requirements for each position on the committee should not be as strictly prescribed as is the case for members of the current National Agricultural Research, Extension, Education, and Economics Advisory Board. ESA believes that this structure would foster a more ongoing and in-depth discussion with the scientific community about scientific prioritization and the future direction of AFRI.

Again, ESA appreciates this opportunity to respond to the report’s findings and recommendations and looks forward to continued collaboration with AFRI. With 7,000 members in academia, health agencies, private industry, and government, ESA relies heavily on funding and research from AFRI and appreciates our ongoing communication with you. Please do not hesitate to utilize ESA as a resource moving forward.

Sincerely,

Phil Mulder, PhD
President, Entomological Society of America