

Regional Conservation Partnership Program (RCPP)
Alternative Funding Arrangements (AFA)

Frequently Asked Questions

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General

1. What is the major difference between RCPP Classic and RCPP Alternative Funding Arrangements (AFA)?

The purpose of AFAs is to fund innovative and partner-led projects that implement conservation activities and achieve conservation benefits that might not be possible or would be more difficult under RCPP Classic. There are three key differences—

- i. All producers/landowners sign contracts with the lead or other partner and are reimbursed by the lead partner or other partner.*
- ii. With the exception of inherently governmental activities performed by NRCS, all technical assistance should be delivered by the lead partner or through an entity subcontracted by the lead partner.*
- iii. AFA awards are reserved for projects that cannot be carried out, or not as effectively carried out, under RCPP Classic.*

2. Does an AFA need to be linked to a RCPP Classic proposal/project?

No, an RCPP AFA proposal should be a separate project/proposal that does not depend on the work of a previous RCPP proposal/project.

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3. How is the NRCS lead state selected for multiple projects, and is this selected by the partner?

The lead partner must identify the lead State as part of the proposal. This should be the state in which the largest percentage of the work will be performed.

4. Are the primary resource concerns/conservation benefits different for AFAs?

No, these are the same resource concerns used in RCPP Classic. As a reminder, Critical Conservation Area (CCA) projects must address one of the priority resource concerns listed for that specific CCA (see page 8 of the Notice of Funding Opportunity (NFO)).

5. Is there a consolidated list of State RCPP coordinators?

Yes, a list of State coordinators is available on the [RCPP How to Apply](#) website. If you have trouble reaching a State Coordinator, please contact the national RCPP team at RCPP@usda.gov.

6. What does NRCS mean when it states it will be substantially involved in AFA projects but expects partners to deliver a majority of the technical assistance?

The funding announcement includes a paragraph explaining why NRCS is not providing grants through this competition. “Substantial involvement” is a term of art for Federal awards and in the case of RCPP, NRCS has interpreted that our need to carry out inherently governmental functions (e.g., AGI, HEL/WC and NEPA compliance) constitutes “substantial involvement.”

Beyond those inherently governmental items, NRCS is giving priority to projects for which the lead partner (either alone or with other entities) is able to deliver the technical assistance for the project.

7. Do you anticipate a similar funding amount for AFA next year?

NRCS anticipates releasing AFA funding announcements in future years with funding amounts to be determined.

8. Are applications more competitive if the lead partner has a history of working with NRCS?

An understanding of NRCS programs and processes is undoubtedly helpful in developing an RCPP AFA proposal, but there is no priority given to entities with a history of partnering with NRCS. As part of their proposal, however, partners must demonstrate the ability and capacity to manage and implement a RCPP AFA project, which shifts technical assistance and conservation implementation responsibilities to the lead partner.

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9. It appears eAuth online services are unavailable, are there any known issues with the system?

The online services for eAuth are available, but office closures due to the COVID-19 crisis may slow response times require establishment of workarounds for processes that would normally be carried out in person. If you experience issues securing eAuth credentials, please notify RCPP@usda.gov.

10. Will NRCS provide feedback on all proposals that are not selected?

Yes.

Payments & Contracts

11. Can the lead partner request an advance payment rather than reimbursement?

Yes, however the partner may only request an advance for work that will be completed within a limited period of time after receiving the advance, and advances must be liquidated at the close of that period. In addition, there will be a cap on the total NRCS funding may be advanced at any one time. NRCS will not provide a second advance until the prior one has been liquidated.

12. Are there any maximum or minimum funding limits governing contracts between lead partners and producers?

NRCS does not anticipate issuing funding limits for contracts between the lead partner and producers or landowners.

Are there some examples of a “pay for performance” conservation approach?

NRCS currently has no authority to make Farm Bill program payments for environmental performance. NRCS provides financial assistance to producers for implementing a conservation practice or enhancement, but not for the environmental performance of the practice or enhancement.

Examples of a pay for performance approach:

- 1) a producer is paid for the tons of carbon he/she sequestered through improved forest management,*
- 2) a producer is paid for the pounds of nitrogen or phosphorous runoff avoided through implementation of nutrient management activities.*

A lead partner proposing a pay for performance approach must in its proposal describe the approach in enough detail to allow reviewers and NRCS an understanding of how producers would be compensated and for what actions, and how NRCS can be assured that meaningful conservation benefits would be delivered.

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Contribution and Match

13. When must a partner contribution occur?

Partner contributions are credible when they are included in an active RCPP programmatic partnership agreement and delivered after the announcement of project selections and prior to the expiration of the partnership agreement.

14. NRCS states that it may discount Federal contributions, what does this mean?

The RCPP statute indicates NRCS may give a higher priority to applications that significantly leverage non-Federal resources. Accordingly, other factors being equal, ranking and evaluation may do so. However, NRCS retains discretion and is most interested in whether non-USDA Federal contributions are truly adding value to a project.

15. Is match required for AFA projects?

For RCPP Classic, NRCS promulgated explicit matching funds requirements for RCPP easements and watershed/public works activities. These matching funds requirements are not a part of the AFA provision. However, AFA partners are encouraged to include matching funds as a part of any easements or watershed activities. Matching funds will be considered as part of the RCPP project evaluation process.

The partner contribution expectation for AFA projects, which is distinct from the matching funds concept described in the preceding paragraph, is the same as for RCPP Classic—NRCS's goal is that each project provide meaningful, value-added partner contributions that at least equal NRCS funding.

16. Would a landowner's donated value on an easement count as match?

Unlike for RCPP Classic easements, AFA easements include no explicit cap on landowner donation. The extent to which any matching funds for AFA easements is split between partner cash and landowner donation will be taken into consideration as part of the AFA proposal evaluation process.

17. Can landowner in-kind and other contributions be used as project contribution?

Yes. The AFA funding announcement states that verifiable producer and landowner expenses may be counted as partner contribution. In an AFA easement context, verification could take the form of the percentage of easement value permanently donated by a landowner to the qualified entity holding the easement.

In a land management context, verification could take the form of producer receipts for third-party services or necessary equipment rentals. The AFA funding announcement

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precludes non-verifiable costs (including producer-provided labor, risk or forgone income) from counting as partner contributions.

Financial Assistance (FA) & Technical Assistance (TA)

18. Why did NRCS develop the specific breakdown of 7% enhancement TA, 5% NRCS TA, and 18% implementation TA?

This breakdown ensures that at least 70 percent of RCPP funding is used for on-the-ground conservation implementation activities. The further breakdown of TA funding was designed to add transparency to TA allocations and usage by partners and NRCS.

19. Can funds help pay for equipment, such as precision agricultural equipment to help implement NRCS's 590 nutrient management practice standard?

Applicants can request purchase of portable, non-fixed equipment as part of proposal, to the extent that 1) the equipment is necessary to advance an innovative conservation approach or technology, 2) the equipment's benefits accrue principally to eligible producers and lands, and 3) the equipment is required to maximize the conservation benefits of the project.

Partners proposing to purchase portable equipment as part of their project must include detailed information in their RCPP Portal proposal.

20. Is training an allowable TA activity, for example training for practitioners and/or TSPs on things like site selection/ implementation to ensure that practices are properly installed?

No. RCPP funding cannot be used to pay for training. However, partner contributions can fund training activities if they are required to ensure the success of the project.

Partner/Land Eligibility

21. Do project partners need to be certified technical service providers (TSPs)?

No. However, partners are encouraged to use TSPs for technical assistance and conservation implementation activities carried out under RCPP projects. In their proposal, lead partners must provide evidence of the capacity and capability of any partner or third party providing technical assistance for an RCPP project.

22. Could an entirely new entity that is designed specifically to execute this project be eligible to apply as a lead partner?

Yes, but that entity would need to demonstrate how it has the expertise and resources to effectively oversee an RCPP AFA. This entity would also need qualify under one of the

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categories for eligible RCPP lead partners (see page 9 of the FY 2020 AFA funding announcement).

23. Would a producer be eligible for financial assistance if they lease land from a local unit of government?

Yes, if the producer has control of the land for the length of the contract and meet producer and land eligibility requirements (e.g., have established farm and tract records with the Farm Service Agency, demonstrated compliance with HEL and Wetland Compliance provisions, etc.).

NEPA/NHPA/ESA

24. Who is responsible for complying with NEPA/NHPA/ESA?

Ultimately, NRCS must sign off on NEPA/NHPA/ESA compliance for all RCPP AFA conservation activities. However, the lead partner is expected to provide all required information necessary to support NRCS's determinations.

25. Can a proposal include costs for a third-party to satisfy NHPA requirements?

NEPA, NHPA and other environmental costs may be included in a proposed budget to the extent that they can be accomplished within the funding limits for Implementation and Enhancement TA categories without adversely affecting potential implementation (i.e., a project budget that proposes Implementation TA be used to carry out extensive NHPA activities but does not account for the Implementation TA needed for project planning, design, installation and checkout is unlikely to be successful). Projects with extensive environmental or cultural resource needs may need to account for some or all those costs as partner contributions in order to be competitive.

Easements

26. When does NRCS expect to have the minimum deed requirements complete?

NRCS anticipates having the minimum deed requirements for AFA easements available for partners in Summer 2020.

27. What qualifications are necessary to acquire an entity-held easement without a U.S. right of enforcement?

There are no specific qualifications for entities interested in pursuing AFA easements without a right of U.S. enforcement. NRCS will take into consideration entities' capacity and track record of enrolling, monitoring and enforcing easements.

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27. If an entity-held easement is a partner contribution (not paid for by any NRCS FA funds), does that easement still need to meet the NRCS minimum deed requirements?

When non-NRCS-funded easements are part of a RCPP project (i.e., they are funded by partner contributions), partners must provide NRCS assurances and NRCS must agree that such easements are generating conservation benefits and consistent with project goals, objectives and deliverables.

28. Can RCPP AFA easements be of varying lengths?

No. RCPP AFA easements must be perpetual or the maximum allowed under state law. A shorter easement would be considered a “land rental” activity for an RCPP project and should be identified as such in the RCPP proposal. While the AFA funding announcement makes clear a preference for short-term land rentals, long-term rentals may be considered on their merits.

Public Works and Watershed Projects

29. Can we design and build public irrigation facilities that become Federal Reclamation infrastructure? And design to U.S. Bureau of Reclamation standards rather than NRCS?

No. RCPP cannot fund a project that would most likely be considered supplementing another Federal agency’s appropriation.

30. Do AFA watershed/public works activities or structures need to follow PL-566 policies and processes?

Watershed/public works activities may be proposed in response to the AFA funding announcement. NRCS welcomes innovative approaches to watershed and public works activities. For any watershed/public works activities awarded as part of an AFA project, however, NRCS must ensure that the structure(s) comply with NEPA and associated Federal laws and regulations and is engineered and constructed to agency standards.

NRCS Standards and Compliance

31. Is it possible for partners to get trained by NRCS to use tools like CART in order to be sure we are working within practice standards?

No. Access to internal NRCS business tool such as CART are limited to NRCS and partner certain partner employees with appropriate permissions. Partners unfamiliar with NRCS programs, planning or technical standards are strongly encouraged to collaborate with others who have that familiarity to improve potential for project success.

32. Does all implementation work have to be done to NRCS standards (manure storage for example)?

No, land management activities that are not consistent with NRCS Conservation Practice Standards or other approved activities will have additional requirements to comply with

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the National Environmental Policy Act (NEPA). NRCS can complete streamlined NEPA reviews when producers implement conservation practice standards due to categorical exclusions provided for those practices. If partners are proposing land management activities that substantially deviate from NRCS conservation practices, an Environmental Analysis (EA) or Environmental Impact Statement (EIS) may be required and would be the responsibility of the lead partner.

If lead partners have questions about the applicability of NEPA, they should contact their State RCPP Coordinator early in the proposal process.