



June XX, 2015

The National Association of Development Organizations (NADO) appreciates the opportunity to submit comments on the U.S. Department of Agriculture's Rural Development (USDA-RD) Interim Rule on Strategic Economic and Community Development (Docket Number RIN 0570-AA94). We welcome the opportunity to comment on this Interim Rule based on Section 6025 of the Agricultural Act of 2014 (P.L. 113-79).

Founded in 1967, NADO promotes regional solutions, partnerships, and strategies that enhance the long-term economic competitiveness and quality of life across America's local communities. The association's core membership serves the nation's 520 regional planning and development organizations – known locally as councils of governments, economic development districts, local development districts, and regional councils – who provide valuable professional and technical assistance to over 2,500 counties and 15,000 small towns and cities.

Regional development organizations (RDOs) have a demonstrated record of implementing and operating many USDA Rural Development grant, loan, and technical assistance programs in rural communities across the United States. We, along with our membership, appreciate that the Interim Rule allows USDA Rural Development to finally allocate investments to projects driven by regional priorities highlighted through multi-jurisdictional plans and partnerships.

We are also pleased that this new rule incentivizes and broadly supports regional planning approaches that have demonstrated a path of cooperation and collaboration among business leaders, governmental entities, nonprofits, and educational institutions in rural areas.

Additionally, this new rule will make it easier for rural communities to access resources to invest in long-term economic and community development efforts by giving priority to applications for Rural Development programs that include regional partnerships and strategies facilitated by the national network of RDOs.

### **Specific Comments**

#### **Definitions (Section 1980.1005)**

NADO appreciates that a plan is defined in the rule as a comprehensive economic or community development strategy that outlines a regions strengths, weaknesses, opportunities, and potential threats. We also want to thank USDA for highlighting the U.S. Economic Development Administration (EDA) and it's locally driven planning process through the national network of Economic Development Districts (EDDs).

We strongly encourage the department to not only define a plan as "a comprehensive economic development or community development strategy" that is multi-jurisdictional in scope, but also include other federally recognized plans such as the Sustainable Communities Plans, recognized by the U.S. Department of Housing and Urban Development; and Stronger Economies Together Plans, recognized by the U.S. Department of Agriculture. Many RDOs also develop and prepare Regional Comprehensive Plans as required by state statutes.

Additionally, we appreciate the department's definition of a multi-jurisdictional plan to be understood not as a single issue plan, but as an all-inclusive document taking into account many factors that make an economy and region stronger.

**Applications (Section 1980.1015)**

We believe it should be clearly explained that the individual USDA-RD project does not need to be specifically listed in a plan to be eligible for priority points under this section, rather projects that are consistent with the goals, policies, and objectives of the multi-jurisdictional plan are deemed as eligible activities.

**Scoring (Section 1980.1020)**

NADO strongly supports the agency's process for scoring applications that are seeking priority consideration. In particular, the focus on existing regional plans and how well they address regional collaboration. We also appreciate the inclusion of consideration of other funding sources including philanthropic investments and other federal agency awards when allocating points. However, we believe scoring should be broadened to allow for state and local agency investments, not just other federal investments.

We would also suggest that the department consider a higher maximum point allowance for this Interim Rule given the amount of time and effort it takes to truly build a multi-jurisdictional plan that meets the definitions and application requirements under this section.

Again, we appreciate the opportunity to comment on the U.S. Department of Agriculture's Rural Development (USDA-RD) Interim Rule on Strategic Economic and Community Development (Docket Number RIN 0570-AA94). NADO looks forward to our continued partnership with USDA Rural Development as this new rule goes into effect and in helping all regions throughout our nation become sources of economic growth.

Sincerely,



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