



August 7, 2015

Branch Chief, Regulations and Paperwork Management Branch
U.S. Department of Agriculture, STOP 0742
1400 Independence Avenue SW.,
Washington, DC 20250-0742

I am submitting 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) on behalf of myself as a citizen of the USA and as an employee of USDA Rural Housing Service responsible for managing an effected program. I appreciate the opportunity to comment on the Interim Rule and the new regional prioritization process that was included in the Agricultural Act of 2014 (P.L. 113-79).

Definitions (Section 1980.1005)

I 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 or state 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.

Applications (Section 1980.1015)

I believe it should be clearly explained that the individual USDA-RD project SHOULD BE specifically list in a plan to be eligible for priority points under this section. Projects that are consistent with the goals, policies, and objectives of the multi-jurisdictional plan are deemed as eligible activities.

The applications for participating in this set-aside and for priority scoring is unnecessarily complicated and time consuming for the customer and for Rural Development. Determination that the project is part of a multi-jurisdictional plan and the extent that it meets the plan should not require an 8 page application and multiple reviews. The funding program applications itself is only 2 pages long. This impediment is not helpful and requires additional bureaucratic delays. A simple qualification and scoring process should be introduced at the State Level with oversight from the National Program or CED local or national office staff. Alternatively, a special allocation of funds could be designated and accessed at the state level and pooled similar to regular funds if not utilized. Scoring could be provided by the State Office Program Staff without additional layers of review.

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