

National Institute Department of of Food and

# National Institute of Food and Agriculture (NIFA) Federal **Assistance Policy Guide: Section I: NIFA Policy Guide Overview and Purpose** pp. 11-23

# **NIFA Office of Grants and Financial Management**

April 21, 2021

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

#### I. NIFA Policy Guide Overview and Purpose

NIFA's Federal Assistance Policy Guide (NIFA Policy Guide) provides information about the NIFA grant and financial assistance process, its associated authorities, and NIFA's responsibilities. NIFA is a Federal agency within the U.S. Department of Agriculture (USDA) and is part of USDA's Research, Education, and Economics (REE) mission area. NIFA administers Federal funding to address agricultural issues that impact people's daily lives and the nation's future. NIFA is USDA's primary extramural research agency, funding institutions and public, private, and non-profit organizations. Our grants enable researchers to address problems critical to our nation's farmers and ranchers, consumers, and communities.

NIFA provides leadership and funding for programs that advance agriculture-related sciences. NIFA's investments support initiatives that ensure the long-term viability of agriculture and apply an integrated approach to ensure that groundbreaking discoveries in agriculture-related sciences and technologies reach the people who can put them into practice. NIFA's mission is to advance knowledge for agriculture, the environment, human health and well-being, and communities by supporting research, education, and extension programs in the land-grant institution system and other partner organizations. NIFA does not perform actual research, education, or extension. National program leadership and funding are two key mechanisms NIFA uses to advance knowledge. NIFA provides financial assistance in the form of capacity grants to land-grant universities and competitive grants for research, education, extension, and outreach to land-grant universities, other institutions of higher education, individuals, non-profit organizations, private entities, and consortiums.

Since the Food, Conservation, and Energy Act of 2008 (the 2008 Farm Bill) authorized its creation, NIFA has taken significant strides toward enhancing the impact of agriculture, natural resources, and human sciences. NIFA collaborates with leading scientists, policymakers, experts, and educators in organizations throughout the world to find innovative solutions to the most pressing local and global problems. Scientific progress, made through discovery and application

- Advances the competitiveness of American agriculture,
- Bolsters the U.S. economy,
- Enhances the safety of the nation's food supply,
- Improves the nutrition and well-being of American citizens,
- Sustains natural resources and the environment, and
- Builds energy independence.

In partnership with other Federal science agencies, NIFA also serves as a vital contributor to science policy decision making.

#### A. Scope ALL AWARDS

The NIFA Policy Guide is the central source of NIFA's administrative guidance for recipients of NIFA grants and partners in cooperative agreements. Other policy guidance documents are linked throughout the Policy Guide, when applicable.

Certain conventions are followed throughout this document. The provisions in this policy guide which are applicable to grants are also applicable to cooperative agreements unless otherwise specified. The term "grantee" is generally used to refer to recipients of grants and awardees of cooperative agreements and means the same non-Federal entity (NFE) used in the Uniform Guidance; however, the terms "recipient" or "awardee" also are used interchangeably. "NIFA" may be used in this document to refer to the entire organization or to its component offices.

## B. Supersession and Applicability ALL AWARDS

#### 1. Supersession

The NIFA Policy Guide supersedes all prior administrative guidance documents. This Policy Guide does not replace the terms and conditions of the award or any of the applicable regulations in Title 7 of the Code of Federal Regulations or other titles and legislation. The NIFA Policy Guide does not supersede the Administrative Guidance for Multistate Extension Activities and Integrated Research and Extension Activities (75 F.R. 48921, Aug. 12, 2010).

The following manuals are superseded:

- Administrative Manual for the McIntire-Stennis Cooperative Forestry Program (March 2000)
- Administrative Manual for Evans-Allen Cooperative Agricultural Research (March 2000)
- Administrative Manual for Continuing Animal Health and Disease Research Program (September 1992)
- Administrative Manual for the Hatch (Experiment Station) Act as Amended (March 2000)
- Expanded Food and Nutrition Education Program Policies (October 1983)
- Administrative Handbook for Cooperative Extension Work, Chapter III (May 1994)
- NIFA Policy Guide (All previous versions)

The NIFA Policy Guide should be referenced in conjunction with any available program guidance documents. When applicable, program guidance documents are linked throughout the Policy Guide.

#### 2. Applicability and Order of Precedence

Recipients of NIFA grants are not directly subject to all of the requirements of the NIFA Policy Guide. The general policies and procedures included in the NIFA Policy Guide apply to all NIFA awards, unless there are statutory, regulatory, or award-specific requirements to the contrary as indicated throughout the Policy Guide and specified in individual RFAs, the Notice of Award, and/or award terms and conditions. The Policy Guide also articulates various provisions and their applicability (i.e., whether it applies to all awards (ALL AWARDS), Competitive (COMPETITIVE AWARDS), or Capacity Awards (CAPACITY AWARDS). If the general requirements do not apply to a particular program or type of financial assistance, it is noted.

The function of this NIFA Policy Guide is to assist in the interpretation of statutory and regulatory requirements. The Policy Guide does not replace the regulatory and statutory language and is intended to be compliant with governing statutes and the requirements of 2 CFR parts 200, 400, 415, and 416 and 7 CFR parts 3419 and 3430. However, in the case of a conflict, the statutes and regulations govern. If there is a perceived conflict between or among these three categories of requirements—statutory and regulatory requirements, the NIFA Policy Guide, and award terms and conditions—or if the grantee has other questions concerning award terms and conditions, the grantee should request written clarification from the Authorized Departmental Officer (ADO).¹ Once a recipient accepts an award, the contents of the Notice of Award are binding on the recipient and NIFA unless and until modified by a Notice of Award signed by the ADO.

### C. Sources of Requirements in Policy Guide ALL AWARDS

This Policy Guide is based on:

- Generally applicable public laws and Executive orders, OMB circulars, the Uniform Guidance regulation, and Federal regulations;
- NIFA-specific policies and procedures applicable to capacity and non-capacity grants and cooperative agreements;
- USDA and NIFA regulations;
- USDA and NIFA program authorizing and appropriations legislation; and
- Federal appropriations law.

The Notice of Award and Award Terms and Conditions contain applicable authorizing legislative citations as well as applicable Federal regulations.

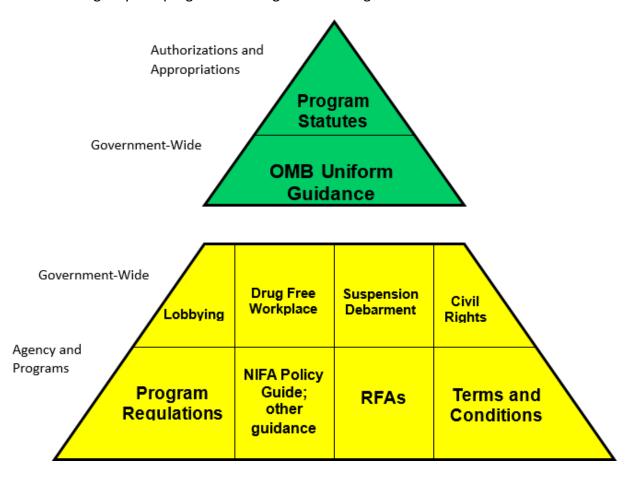
#### D. Effect ALL AWARDS

The NIFA Policy Guide supplements, but does not replace, governing statutory and regulatory requirements. The requirements of the NIFA Policy Guide apply in addition to governing statutory and regulatory requirements and award-specific

<sup>&</sup>lt;sup>1</sup> The Authorized Departmental Officer (ADO) is the individual, acting within the scope of delegated authority, who is responsible for executing and administering awards on behalf of the U.S. Department of Agriculture.

terms and conditions. Requirements not specified in the NIFA Policy Guide will generally be provided in the Notice of Award, but such notice is not required for the award to be subject to the requirements of applicable statutes and regulations. The award provisions will indicate the applicable general award terms and conditions and the NIFA agency-specific terms and conditions. NIFA's terms and conditions are located on the NIFA website. Note that an individual award also may contain award-specific terms and conditions. Certain NIFA programs may also have program-specific terms and conditions. When questions or conflicts arise, the Notice of Award and Award and award Terms and Conditions have precedence.

Where there are conflicting requirements in statutes and regulations, there is a generally recognized hierarchy, illustrated below. Program statutes and appropriations law are at the top and trump all requirements as no changes can be made to statutory requirements without Congressional authorization. Below that are the layers of requirements, but these are not hierarchical. They include government-wide regulations, such as those issued by OMB, as well as agency and programmatic regulations and guidance.



#### E. Roles and Responsibilities ALL AWARDS

The following articulates the roles and responsibilities associated with NIFA-issued Federal financial assistance.

#### 1. NIFA Roles and Responsibilities

NIFA is responsible to Congress and the U.S. taxpayer for carrying out its mission in a manner that results in the support of meritorious science (research, education, extension, and/or outreach) that is in compliance with applicable legislation and regulations. NIFA seeks to ensure integrity and accountability in the award and administration of grants by relying on a system of checks and balances, conducting routine monitoring and oversight of awards, and by establishing a set of expectations for grantee organizations consistent with the provisions in the Uniform Guidance.

NIFA is one of four USDA agencies that make up the REE mission area. The other agencies are the Agricultural Research Service (ARS), Economic Research Service (ERS), and the National Agricultural Statistics Service (NASS). REE agencies provide Federal leadership in creating and disseminating knowledge that spans the biological, physical, and social sciences related to agricultural research, economic analysis, statistics, extension, and higher education. Congress established NIFA through the Food, Conservation, and Energy Act of 2008. NIFA succeeded the former Cooperative State Research, Education, and Extension Service (CSREES), which had existed since 1994.

NIFA is organized into four Institutes (Institute of Food Production and Sustainability (IFPS); Institute of Bioenergy, Climate, and Environment (IBCE); Institute of Food Safety and Nutrition (IFSN); and Institute of Youth, Family, and Community (IYFC)), each with its own programmatic science portfolios. The scope of any one program or grant might encompass the mission of multiple Institutes. NIFA institutes and offices provide science leadership (i.e., develop programs and RFAs) for and oversee many of the capacity and competitive grants pre-award and post-award processes. Subunits of institutes are typically divisions. NIFA also has a Center for International Programs, which works with the four Institutes to advance U.S. agriculture through global engagement. The NIFA organization chart can be found on the NIFA website.

Various offices and individuals at NIFA are involved throughout the grant process, from funding opportunity development and recipient selection, to fund distribution and post-award management. In carrying out NIFA's primary mission of facilitating research, education, and extension, NIFA interacts on a continuing basis with academic and non-academic institutions, private industry, state and local governments, and other Federal agencies. The roles and responsibilities of NIFA offices and individuals as they relate to grant oversight and management are as follows:

- a. NIFA Institutes. Institutes address broad programmatic areas and may be divided into divisions based on related science or function. The institute is led by a Deputy Director and the divisions are led by a Division Director. The four NIFA institutes are largely organized by science emphasis areas and bring together professionals with expertise in various scientific disciplines. NIFA institutes function as multi-disciplinary, outcome-based teams that address stakeholder needs and enhance the overall performance of programs.
  - i. Institute Deputy Director: The Deputy Director provides leadership for the administration of programs and the day-to-day operational management of each institute. The Deputy Director is also responsible for compliance with policies, regulations, and legislative authorities in the administration of all programs assigned to the institute. Institute Deputy Directors collectively provide leadership for the agency's science priorities, budget, programs, policies, and processes.
  - ii. Division Director: The Division Director supervises the management of programs and staff within the division and provides the oversight for the science emphasis areas associated with the divisions. Program Division offices are responsible for scientific, technical, and programmatic review; recommendations for award; and the evaluation of proposals and programs.
  - iii. National Program Leader: National Program Leaders (NPLs) are senior scientific staff members who:
    - Network and collaborate with partners and stakeholders to identify the mission-relevant problems, opportunities, and issues that require Federal attention and support;
    - Conceive, formulate, and direct programs and activities to respond to existing or emerging problems, opportunities, and issues through the development and application of science-based knowledge;
    - Administer and manage programs and activities to develop and apply science and knowledge; and
    - Evaluate and assess the quality, outcomes, and impacts of these programs.

The NPL identified in the award letter monitors the scientific, educational, and outreach aspects of an award. NPLs are the agency's programmatic contacts on RFAs and are responsible for the day-to-day management of a portfolio of grants, projects, and programs.

iv. Center for International Programs. NIFA supports global engagement that advances U.S. agricultural goals. The Center for International Programs (CIP) works with NIFA's four institutes to develop program opportunities for international collaboration or activity in agricultural research, education, and

- extension to apply the best science to solve problems, increase our global competitiveness, and promote U.S. scientific leadership in food and agriculture.
- b. Planning, Accountability, and Reporting Staff. As a program unit within NIFA, the Planning, Accountability, and Reporting Staff (PARS) provides leadership in planning, evaluation, accountability, and reporting. NIFA uses these activities to support program leadership, management, resource allocation, and program success. Activities include: strategic planning, portfolio assessments, program evaluation consulting, REEport Grant Reporting System, State Plan of Work and Annual Report, Multistate Research Fund, Capacity Grant approval coordination, data query and report generation, data systems requirements consulting, EPSCoR co-leadership, intellectual property reporting compliance, institutional/program review coordination, and performance sections of the Agency budget. For more PARS information, visit the NIFA website.
- c. Office of Grants and Financial Management. The Office of Grants and Financial Management (OGFM) is responsible for business and financial processes, audit coordination and resolution, compliance reviews, and administrative assistance across the continuum of awards from pre-award through closeout. OGFM ensures that all assistance awards are consistent with applicable policies, regulations, directives and fund certifications. OGFM responsibilities include:
  - Ensure proper publication of Requests for Applications (RFA) and compliance with statutes, regulations and policies
  - Evaluate grant applications for administrative content and compliance with statutes, regulations, and guidelines;
  - Negotiate grants and indirect cost rates;
  - Provide consultation and technical assistance to applicants and grantees, including interpretation of grants administration policies and provisions;
  - Administration and oversight of active grants, including grant modifications, site visits, and desk reviews;
  - Coordinate audits with oversight offices such as the Office of Inspector General and the Government Accountability Office;
  - Obligate and de-obligate funds; and
  - Manage the Automated Standard Application for Payments (ASAP); and closing out grants.
- d. Budget Office. The Budget Office is responsible for the formulation, execution, and review of the Agency's annual budget. As such, the Budget Office is accountable for NIFA's role in each of the three interrelated phases of the Federal budget process:
  - Formulation of the Agency's budget, from submission of the President's Budget Proposal through Congressional development and passage of appropriations;

- Execution of the Agency's budget by allotting and allocating to the various NIFA Federal assistance programs in accordance with appropriations and authorizing legislation; and
- iii. Review of the financial performance reports to determine the effective and efficient use of Federal appropriations in support of NIFA's Federal assistance programs.

The Budget Office works closely with the USDA Office of Budget and Program Analysis (OBPA) and OMB throughout the budget cycle. The Budget Office ensures that budget authorities for NIFA-administered programs are properly established in USDA's Financial Management Modernization Initiative (FMMI) financial management module. The Budget Office also works closely with the OGFM's Financial Management Division (FMD). FMD records and reconciles all agency transactions and prepares various accounting reports for NIFA's Federal assistance programs. This close relationship is key to the effective and efficient management of Federal financial resources in support of NIFA's Federal assistance programs in the food and agricultural sciences.

2. Land-Grant Institutions – Cooperative Extension and Research The First and Second Morrill Acts established the 1862 and 1890 land-grant universities, respectively. The Equity in Educational Land-Grant Status Act of 1994 established the 1994 land-grant universities, while the Food, Conservation, and Energy Act of 2008 established the Hispanic-Serving Agricultural Colleges and Universities (HSACUs). Many NIFA grant programs, capacity and competitive, support the agricultural extension and experiment station work of the land-grant universities.

#### a. Cooperative Extension

All capacity funds allotted for cooperative extension must be used in accordance with the purpose of the authorizing legislation and the terms and conditions of the award. All institutions receiving funds to support cooperative extension work must maintain a definite and distinct administrative division for management and conduct of all cooperative extension work in agriculture and home economics. Institutions must have a Director of cooperative extension.

## b. Hatch/Experiment Station

All capacity funds allotted to support state agricultural experiment stations must be used in accordance with the purpose of the authorizing legislation and the terms and conditions of the award. Each agricultural experiment station must have a Director and Treasurer. The Treasurer, or the equivalent thereto, is responsible for accounting for all allotted funds (7 U.S.C. 361e)<sup>2</sup>.

<sup>2</sup> This language comes from the statute. Institutions are not required to have a Treasurer so long as there is an equivalent position to account for grant funds. Generally, NIFA terms this position the "custodian of funds."

#### c. Section 1444 and 1445

All capacity funds allotted to support 1890 land-grant universities must be used in accordance with the purpose of the authorizing legislation and the terms and conditions of the award. Each 1890 land-grant university must have an Extension Administrator and Agricultural Research Director as well as a custodian of funds.

3. Recipient Roles and Responsibilities During the Grant Period
The grantee or recipient is the entity receiving financial assistance directly from NIFA
to carry out a project or program. The Project Director/Principal Investigator (PD/PI),
Authorized Representative (AR), National Program Leader (NPL), Authorized
Departmental Officer (ADO), and Awards Management Division (AMD) Grant
Specialist are key members of the grant team, coordinating and carrying out the
scientific and administrative aspects of the grant. Applicants and grantees may
communicate with the NPL and other NIFA staff; however, NIFA conducts official
business with only the designated PD/PI(s) and ARs, not subrecipients. The NIFA
Certifying Official is another key official in the administration of a Federal grant. The
NIFA Certifying Official, who is located in the Financial Management Division (FMD),
is responsible for certifying Federal funds for individual grants in ASAP.

The Notice of Award is the official award document and will identify the contact information for a NIFA administrative and programmatic contact for that award.

Below is a list of roles and responsibilities of grantee participants. This list is not all inclusive, but covers major roles across all grants as well as key roles under major grant programs.

#### a. Authorized Representative (AR) ALL AWARDS

The AR, a government-wide term, is the designated representative of the grantee organization in matters related to the award and administration of its NIFA grants. The AR:

- Submits proposals on behalf of the institution;
- Receives and accepts awards;
- Commits the awardee's time and other resources to the project;
- Commits the awardee to comply with the terms and conditions of the award instrument;
- Submits post-award actions; and
- Otherwise acts on behalf of the awardee institution.

The AR has an overall responsibility to ensure grant funds are expended for allowable purposes in accordance with Federal authorizing statutes, program regulations, government-wide laws and regulations, required certifications and assurances, and the approved plan of work.

In Grants.gov, the AR's signature is documented as part of the electronic submission process and is authenticated through the Grants.gov registration process. In signing a grant application, the AR certifies that the applicant institution will comply with all applicable assurances and certifications referenced in the request for applications. By accepting a NIFA award, the applicant institution is subject to the provisions noted on the award, which includes being accountable both for the appropriate use of funds awarded and for the performance of the grant-supported project or activities proposed in the application.

Although NIFA requires that the grantee institution designate an AR, NIFA does not specify the institution location or full set of responsibilities for this official. A single individual may have this authority or multiple individuals may share some or all of this authority. The AR is a role of authority, it is not a specific position within an institution. For instance, an Extension Director or Administrator may also act as the AR because he/she has the authority to submit proposals and receive awards on behalf of the institution. Authorized Organization Representative is the previous name of the AR and, for NIFA purposes, the terms are interchangeable. The term AR is used in the NIFA Policy Guide because of its use on the SF-424 and the Notice of Award and is not intended to create a new position or role.

#### b. Project Director COMPETITIVE AWARDS

Project Director (PD) is the single person designated by the awardee in the application and approved by the ADO who is responsible for the direction and management of the project. The PD is also known as the Principal Investigator (PI) for research activities (7 CFR 3430). NIFA uses the term PD to refer to this individual for all types of projects (research, extension, and education). The organization applying for a NIFA grant, or the applicant organization, may designate multiple individuals as PDs who share the authority and responsibility for leading and directing the project, intellectually and logistically. Each PD is responsible and accountable to the organization receiving a NIFA grant, or the grantee organization, or, as appropriate, to a collaborating organization, for the proper conduct of the project or program, including the submission of all required reports. NIFA will recognize all the PD/PIs and co-PD/PIs listed on an application on the resulting award as applicable (e.g., any individual listed as a "co-investigator" is not identified on the award). The presence of more than one identified PD/PI on an application does not diminish the responsibility or the accountability of any individual PD/PI. The PD/PI listed in Box 14 of the Notice of Award will be considered, for NIFA purposes, the contact PD/PI and is responsible for communicating information to other PD/PIs.

NIFA encourages PD/PIs to maintain contact with the NIFA NPL or NIFA program staff with respect to the programmatic aspects of the project and with OGFM about the business and administrative aspects of the award. The NIFA staff contacts list is available online.

# c. 1890 Extension Administrator and Agricultural Research Director **CAPACITY AWARDS**

The 1890 Extension Administrator and Agricultural Research Director are responsible for: extension or research activities; funds at the 1890 land-grant college or university; and compliance with the applicable rules and regulations. They assume responsibilities imposed by the NIFA capacity award and should report directly to the university governing board (President, Provost, etc.). The Administrator/Director authorizes distribution and expenditure of award funds and ensures expenditures are consistent with the approved plan of work. The governing body of the institution may designate the 1890 Extension Administrator and Agricultural Research Director to serve as the AR for the award and NIFA strongly encourages 1890 institutions to do so with their applicable 1890 NIFA capacity awards.

- d. Custodian of Funds (Legal Custodian) CAPACITY AWARDS
  All recipients of NIFA capacity awards must designate a Custodian of Funds. The
  governing body of the institution appoints a Custodian of Funds to receive and
  account for all NIFA grant funds (Smith-Lever, Section 1444, Section 1445,
  McIntire-Stennis, EFNEP, RREA, etc.) allocated to the institution. For Hatch Act
  grants, this person is the Treasurer or equivalent, as references in Section 2.b.
  above. The Custodian of Funds certifies and submits the annual and final SF-425
  financial reports. NIFA strongly encourages the Comptroller of the University to
  certify SF-425, however, it is not required. Under 2 CFR 200.303, internal
  controls and separation of duties are required elements in administration of
  grant awards and institutional controls/separation of duties may vary. The
  Custodian of Funds must be someone other than the person who authorizes
  and/or approves expenditures.
- e. Cooperative Extension Director **CAPACITY AWARDS**Under the Smith-Lever Act, each 1862 land-grant institution must designate one administrator to have overall control and authority over the allocation and use of Federal Cooperative Extension Service (CES) funds within their institution. (In some states, the same person will have ultimate authority of Agriculture Experiment Station (AES) funds and CES funds). The individual charged with control and authority for Federal CES Funds is designated to USDA as "The Cooperative Extension Director" (CES Director), but may hold a working title consistent with the institutions administrative title system. The designated CES Director may assign other representatives or roles to assist with administering Federal CES funds within their organization, however the CES Director remains

the exclusive chief administrative officer authorized to receive and allocate Federal CES funds and to certify compliance with all corresponding CES responsibilities.

f. Insular Area Extension Administrator and Experiment Station Director CAPACITY AWARDS

The Insular Area Extension Director and Agricultural Research Director are responsible for extension or research activities, funds at the insular area land-grant college or university, and compliance with the applicable rules and regulations. They assume responsibilities imposed by the NIFA capacity award and should report directly to the university governing board (President, Provost, etc.). The Directors authorize distributions and expenditures of award funds and ensure expenditures are consistent with the approved plan of work. The governing body of the institution may designate the Administrator or Director to also serve as the AR for the award. NIFA strongly encourages institutions to designate the Extension Director Agricultural Research/Experiment Station Director as the AR for the applicable NIFA insular area capacity awards.

- g. Agriculture Experiment Station Director **CAPACITY AWARDS**The Directors of Agricultural Experiment Stations (AES Directors) are the chief administrative officers for AES at the 1862 land-grant institutions. In certain integrated states, the AES Director and CES Director hold a single, consolidated position (AES/CES Director). Per the Hatch Act, Federal law assigns to the AES Directors ultimate control and authority over the allocation and use of AES funds within the institution. AES Directors may designate other representatives or roles to assist with administering grant monies within the organization, however the AES Directors remain the exclusive chief administrative officers authorized to receive and allocate Federal AES grant funds and to certify compliance with all corresponding AES responsibilities.
- h. Administrative Technical Representative (AT-R) CAPACITY AWARDS The Administrative Technical Representative (AT-R) is the official responsible for forestry research under the McIntire-Stennis Act at the certified institution eligible to participate in the McIntire-Stennis Cooperative Forestry Research Program. The AT-R is appointed by the highest executive officer of the participating institution and is not a Federal employee. The responsibilities of the AT-R within the administrative framework that prevails at his/her institution, include:
  - Determine the research to be conducted by the institution using McIntire-Stennis funds and matching funds;
  - Manage McIntire-Stennis funds and matching funds for carrying out the purposes of the Act;
  - Ensure timely submission of required reports; and

• Comply with the rules and regulations applicable to the conduct of the McIntire-Stennis Cooperative Forestry Research Program.

#### i. EFNEP Coordinator CAPACITY AWARDS

Each land-grant university has an Expanded Food and Nutrition Education Program (EFNEP) coordinator who provides leadership and oversight for that university's EFNEP program. Responsibilities include hiring, training, monitoring, and developing staff; enforcing EFNEP program policies; responding to messages/requests from the NIFA; completing reporting requirements; providing oversight over data management; and keeping university administration and stakeholders informed about the program and its impacts.

At many universities, EFNEP Coordinators provide overall direction of programming and work with other state/territory, regional, and/or local personnel to provide training, supervision, and evaluation of paraprofessional staff. In situations where others are responsible for paraprofessional supervision and evaluation, we strongly encourage that mechanisms are in place for EFNEP Coordinators to provide input and to ensure that program requirements and expectations are understood and met.