January 22, 2021

To: Leah Leach, Agreement Specialist, lleach@usaid.gov

U.S. Agency for International Development (USAID)

CC: Mark Gleason, APS President; Amy Hope, Scientific Societies.

Subject: Comment on Draft Notice of Funding Opportunity, Feed the Future Innovation Lab for Current and Emerging Threats to Crops.

Dear Ms. Leach,

The Public Policy Board of the American Phytopathological Society, (APS), is pleased to see the important role that pests and disease play in reducing food security and capacity for income generation and think that the proposed IL is a much-needed initiative. We are glad to submit the following comments on the draft notice of Funding Opportunity (NOFO) for the Feed the Future Innovation Lab for Current and Emerging Threats to Crops (FTF CETC).

Overall, the emphasis on smallholders is welcome, as is the balance recognized between the needs of producing crops for consumption and for generating income; some of the key challenges facing crop production in aid-receiving countries are in cash crops not staples (coffee rust, black twig borer, various banana diseases, wilt and phytophtora pod spot in cacao, for example).

Q1. Theory of change.
From the perspective of what is known about behavior change and technology adoption in agriculture, the theory of change as stated in Section A.IV.b. (ii) is outdated. It expresses an inadequate model for what is necessary for change. It describes the requirements for change almost exclusively in terms of information deficit (first if... then pair) or lack of understanding (second if... then pair). It has been a long time since the mainstream of work on the practice and theory of adoption/change abandoned the belief that resolving either of these problems is sufficient to for change. Thus, there is a basic problem with the premises about change as they are currently stated. Since the theory of change forms the basis for framing the type of research that is needed, the APS leadership is standing by to serve as one subject matter group willing to be helpful as relevant experts to revise the statement of the propositions.

Q2 Adequacy of the description of the program
The draft NOFO provides a clear, but rather broad, description of what USAID wants from the IL. The goals are ambitious and proposers may feel it daunting to bring forward plans that have a realistic chance of making meaningful progress on all or even
a majority of these. One issue is that the language of the NOFO moves between technical and methodological items (such as those listed in the bullet point list spanning p12-13) and very high level goals that express national or regional outcomes for broad socio-ecological categories. The potential budget is large, but the aspirational wording of the NOFO seems rather to reflect USAID's mission in toto rather than that of one IL. Is it really expected that the IL will tackle questions of, for example, income resilience from a starting point of disease and pest surveillance? The links between these things are sometimes quite direct (in the case of acute outbreaks of single pest or pathogen species) but often much more diffuse. A more realistic expression of what one IL can be expected to do in an already crowded and complex ecology of institutions and programs would benefit both proposers and, ultimately, USAID because it would be likely to result in more tightly-focused proposals with clear and realistic goals. This issue connects with Question 3.

Q3 How can USAID interact more effectively with local partners?
One issue that proposers will face is that the NOFO does not appear to contain a priority list of target countries or regions. Such a list can be pieced together from other USAID policy documents or the RFAs from other ILs, but should be spelled out as soon as possible. The reason for this is obvious. As already noted (and as is well known to USAID) in every region where it operates there is already a complex network of local, national and regional actors whose goals overlap with those of USAID (the question explicitly acknowledges the existence of these networks). However, in each region, indeed in each country, the detailed structure and function of these networks differs and so the precise needs for how the IL should operate to be most effective vary from place to place. For this reason we anticipate that the answer to Q3 will become clear through the current consultation process, but it would be greatly facilitated by a clear statement of USAID's the regional priorities. This will clearly inform the type of organizational structure that proposers suggest for the way the IL will fit its work into the institutional ecosystem and (as referenced above), likely lead to clearer, more effective proposals. Since the type of organization/institution with which the IL might be expected to partner will vary depending on region, proposers are also likely to need guidance on what types of organization are permitted to receive funding from USAID through the IL.

Many APS members contribute to the work of USAID or other development efforts and coming off the back of the International Year of Plant Health in 2020 we are encouraged to see further opportunities for work to reduce the global burden of plant disease. Thank you for your consideration of these comments.

Respectfully,
Rick Bennett, Ph.D.
Chair: APS Public Policy Board