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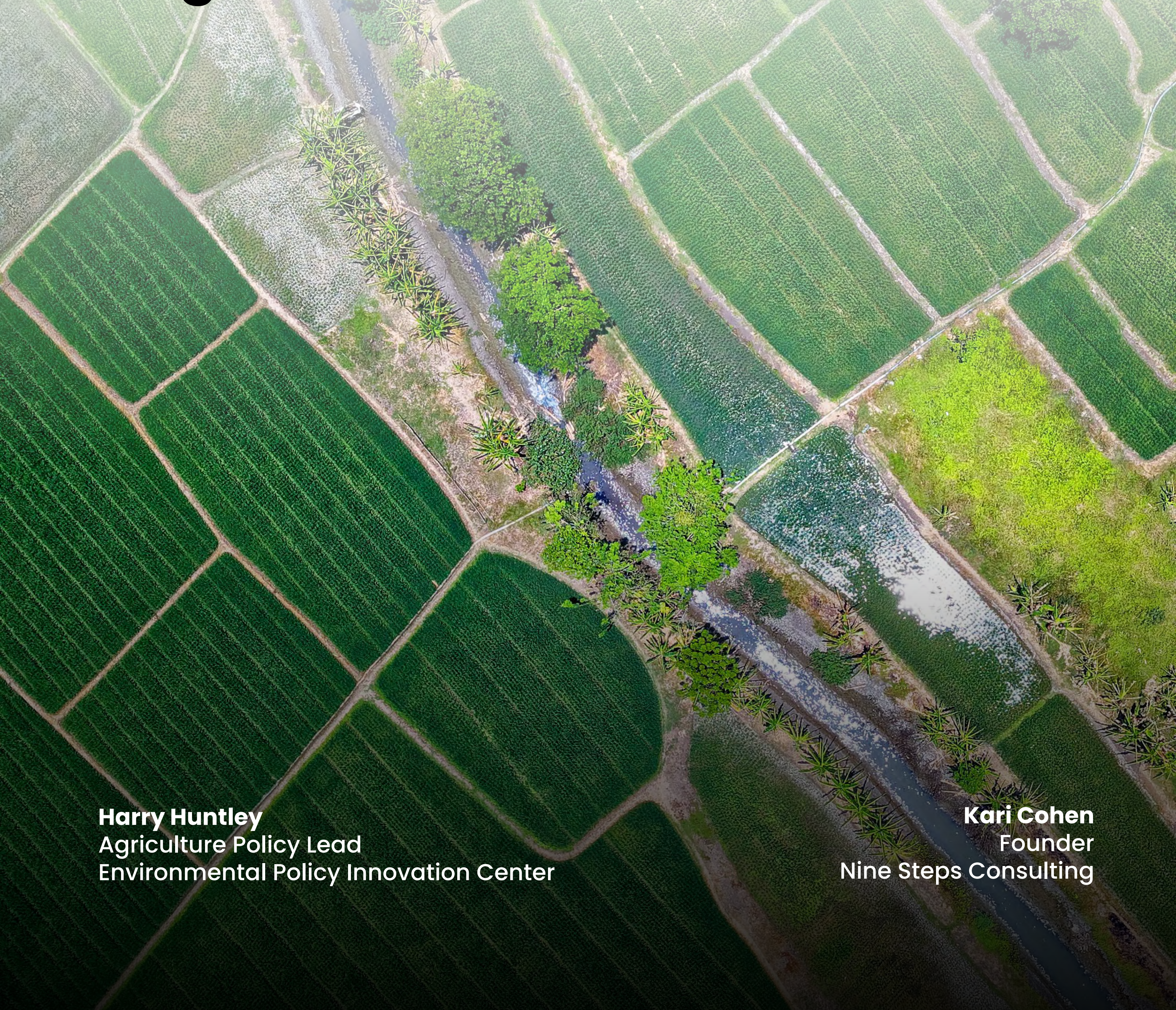
"A Good Program in Theory": Opportunities for Administrative Improvements to USDA's Regional Conservation Partnership Program



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Acknowledgement

This report benefitted from interviews with and survey answers from dozens of recipients of USDA Regional Conservation Partnership Program grants. We thank them and dedicated NRCS staff for their time devoted to improving this important program.

The Environmental Policy Innovation Center (EPIC) is a national nonprofit with the mission of building policies that deliver spectacular improvement in the speed and scale of conservation.

EPIC's agriculture program uses cutting-edge technologies and novel policy solutions to 1) develop new sources of demand for conservation outcomes, 2) ensure conservation dollars are spent as cost-effectively and quickly as possible, and 3) incentivize the creation of new solutions to the most pressing resource concerns.

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Executive Summary

The Regional Conservation Partnership Program (RCPP) is a unique, partner-led, region-focused US Department of Agriculture conservation program. Under the authorities of the 2018 Farm Bill, RCPP operates through two components: RCPP Classic and "Alternative Funding Arrangements," which allow partners to directly engage with producers using innovative methods. The 2022 Inflation Reduction Act supercharged the program with an additional $4.95 billion.

However, slow policy rollouts, inconsistent guidance, high turnover among NRCS coordinators, and challenges with innovative projects have raised concerns about the agency's ability to efficiently allocate and implement this funding. In response, NRCS established an internal improvement initiative in 2023. That initiative has made some progress, but significant challenges remain in realizing RCPP's potential to deliver impactful, performance-based conservation.

This report offers actionable recommendations to address structural gaps, improve program efficiency, and align RCPP with its conservation and innovation mandate.

The report is informed by the authors' own experiences with the program, support to and interviews of partners, and a survey covering more than 40 projects. The survey, consisting of 14 substantive questions and six questions for project and partner identification, was conducted in October and November, 2024. Respondents represented a diverse range of partner and project types.

Important findings from the survey include:

- Most partners reported taking over eight months to develop their programmatic partnership agreement, and at least a quarter reported more than 16 months between receiving their award and signing their first supplemental agreement.
- As a result, most partners operate at their own cost for 8-16 months during which none of their staff time was eligible for reimbursement.
- Despite all projects surveyed being at least a year old, a third of respondents still had not actually received any funds, though reimbursement timelines seem to be improving.
- Since beginning the application process, partners have worked with an average of 2.15 state RCPP coordinators.
- Proposal development was seen as the most efficient process, while easement transactions were rated least efficient.
- Roughly half of respondents noted changes since the RCPP improvement initiative began, often citing better-trained staff, though structural changes were less apparent.
- A majority would reapply, citing the importance of the funding for conservation, and only six respondents definitely would not reapply.

Reducing these problems does not require statutory changes.

Four broad categories of administrative changes would improve the program: accelerate contracting, delegate to local authority, simplify financial transactions, and support flexibility and innovation. Aligning application questions with PPA requirements and conducting a full-day workshop between local NRCS staff and partners after award are two simple yet impactful solutions. Delegating more authority to state staff, reducing PPA rigidity, and streamlining communication can make the program more adaptable. Adopting a user-friendly payment portal and enabling self-certification of adjusted gross income and conservation compliance (swampbuster and sodbuster) could eliminate two frequently-mentioned headaches. Clear guidance from headquarters that flexibility is encouraged for innovative projects, fund reallocation, and practice standards would better allow partners to meet the goals NRCS agreed were worthy when the projects were awarded.

Beyond these improvements, some statutory changes are likely advisable.

Introduction

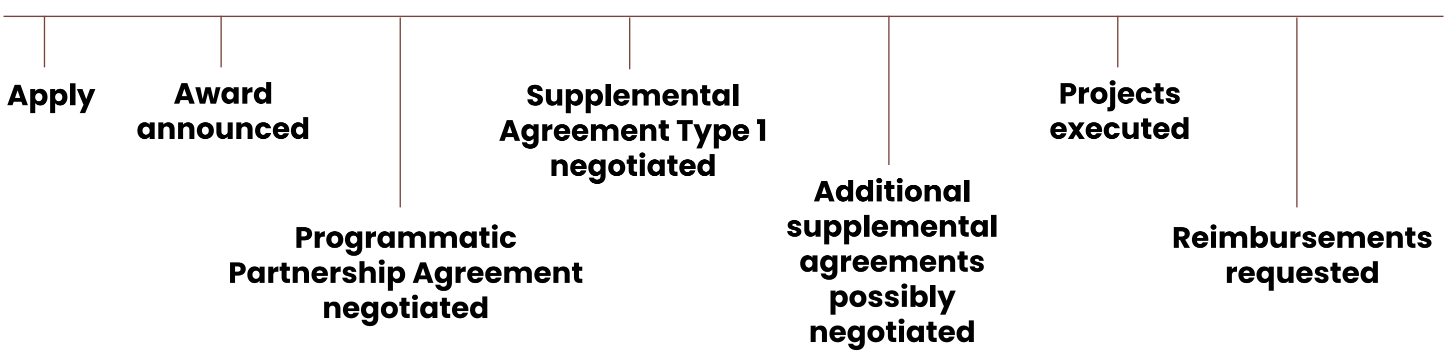
Program Description

The Regional Conservation Partnership Program (RCPP) is one of the US Department of Agriculture's (USDA) "big five" conservation programs administered by the Natural Resources Conservation Service (NRCS). It's defined by its unique partner-led and region-focused approach to on-farm conservation. The program's potential effectiveness is primarily rooted in its ability to bring together a diverse array of partners, including private companies, non-profit organizations, state and local governments, and agricultural and environmental groups, to implement conservation supported by Farm Bill funding and partner contributions.

The program was first authorized by the 2014 Farm Bill in part to replace myriad geography-based conservation carve-outs with a more comprehensive program to target Farm Bill funding to address local or regional natural resource concerns alongside partners. The first version of RCPP authorized was effectively a way to dedicate funding from NRCS's other Farm Bill programs—EQIP, CSPACEP, and watershed/PL-566 program authorities–to specific landscapes.

The 2018 Farm Bill radically changed RCPP, turning it into a standalone program with its own appropriations, contractual authorities, new agreement authorities and an expanded Alternative Funding Arrangements (AFAs) component.

RCPP currently operates through two components: RCPP Classic and AFAs. RCPP Classic involves implementing conservation projects through NRCS contracts and easements with producers and landowners, with partners responsible for identifying the project area and resource concern(s). Under a Classic project, partners may also help identify participating producers and landowners and even help provide technical assistance. In contrast, Alternative Funding Arrangement projects empower lead partners to work more directly with agricultural producers on implementation of conservation practices and easements, enabling the use of innovative conservation approaches and methodologies not typically available under RCPP Classic.



Timeline not to scale

The first thing all RCPP awardees must do is negotiate and sign a programmatic partnership agreement (PPA) with NRCS. The PPA is a bespoke RCPP creation, based on new authorities included in the 2018 Farm Bill. PPAs do not obligate any funding to partners or projects, but instead serve as an umbrella agreement that lays out how NRCS and the lead partner intend to implement the project. Following execution of a PPA, lead partners will then negotiate and execute at least one Supplemental Agreement (SA) with NRCS. SAs are used by the agency to obligate technical and financial assistance funding to partners. There are different types of SAs to serve different project needs, but the type most commonly used by partners is known as a Type I SA, which obligates technical assistance funding to partners.

Advocates and researchers who support USDA using more performance-based approaches to conservation payments have paid particular attention to RCPP because of its general programmatic flexibilities but also its clear statutory mandate to scale innovation. The 2018 Farm Bill encourages partners to carry out RCPP “projects that use innovative approaches…such as the provision of performance-based payments to producers and support for an environmental market”. The statute also directs USDA to prioritize projects that “provide innovation in conservation methods and delivery, including outcome-based performance measures and methods”. However, performance-based projects have faced unique challenges, in addition to those that have slowed other kinds of AFA projects

While RCPP is governed by the 2018 Farm Bill statute and subsequent 2021 program rule, much of the program’s granular policy is found in annual Notice of Funding Opportunity (NoFO) releases. These funding announcements outline the availability of program funds, proposal processes, and specific program requirements and guidance. Changes between NoFOs can signal modifications to RCPP’s goals and objectives, and in program policy. The NoFO can also provide helpful guidance that partners use in contracting and once they begin to implement their projects.

Report Needs and Aims

In August 2022, the Inflation Reduction Act (IRA) authorized an additional $4.95 billion for RCPP, starting with $250 million in 2023 and rising to $2.4 billion in 2026 (representing an 800% increase in funding above the Farm Bill baseline). NRCS must prioritize climate change mitigation projects using IRA funding, and there is no limit on the number of Alternative FUnding Arrangement projects that can be awarded using IRA funding. NRCS accelerated the awarding of IRA funding in both 2024 and 2025, to the point that, as of publication of this report, only the $2.4 billion appropriated for 2026 remains unawarded.

Since passage of the 2018 Farm Bill, the slow rollout and uneven implementation of new program policies, guidance, documents and IT tools, as well as high turnover in the cadre of NRCS State RCPP Coordinators, has led to concerns on the part of stakeholders regarding NRCS’s ability to successfully award, obligate and expend the IRA windfall. In spring 2023, NRCS leaders established internal RCPP improvement teams charged with soliciting partner and stakeholder feedback and recommending program enhancements and improvements. The first Notice of Funding Opportunity (NoFO) to include some of these program improvements was released in May 2023. The improvement teams’ work has continued since then and the agency has previewed further improvements that may come in future application periods.

Despite the establishment of the internal RCPP improvement team, there is still a significant need for additional problem solving capacity to ensure the program can live up to its mandate to provide a substantial positive impact on conservation. This report aims to fill this gap by providing NRCS with actionable recommendations based on stakeholder feedback, desk research, and expertise. The report identifies challenges related to the program's current structure and offers solutions to make it more effective and aligned with its conservation goals, including by more seamlessly incorporating performance-based conservation.

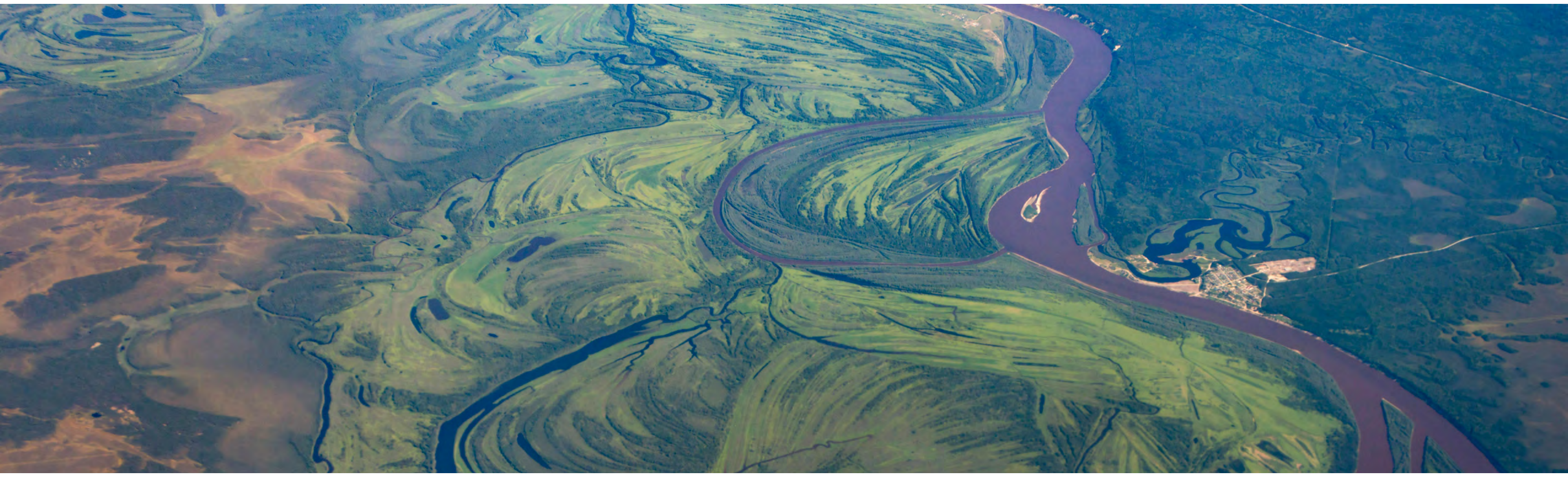
Methods

A survey was conducted, which is believed to have reached all RCPP awardees in 2020, 2021, and 2022. The survey was distributed to the same list that NRCS used for its internal survey of RCPP challenges. Where contact information could be found (approximately 70%), the survey was also sent to 2023 awardees. The survey consisted of 14 substantive questions and six questions for project and partner identification. It was conducted in October and November 2024. Respondents represented a diverse range of partner and project types. Projects awarded in 2024 were not included, because they had only just been announced. In total, it was distributed to 286 email addresses.

The authors previously produced a comprehensive evaluation of the 2023 RCPP NoFO to identify areas where the agency has made strides in its current administrative improvement effort and where further action is needed. Also, interviews were conducted with the six awardees who have signed agreements to complete projects using performance-based payments, which resulted in a published set of case studies. Distribution of those case studies led to significant interest from RCPP awardees, who were willing to discuss their challenges with the program.

Prior to beginning research for this report, the authors had significant expertise with the program. Kari Cohen spent 21 years working for NRCS, the last four of which he supervised a team responsible for all RCPP policy, guidance, training, award recommendations, program oversight, and communications. Harry Huntley has managed a $2.7 million RCPP project–one of the first to use performance-based payments–and has consulted extensively with legislative decision-makers on statutory improvements to the program.

In addition to interviews and the survey, the authors provided hands-on technical assistance to a select number of RCPP awardees to gain an understanding of the nuanced challenges that arise at different stages of RCPP project implementation. This hands-on involvement enriches the quality of our recommendations, making them timely, relevant, and deeply informed by current challenges.



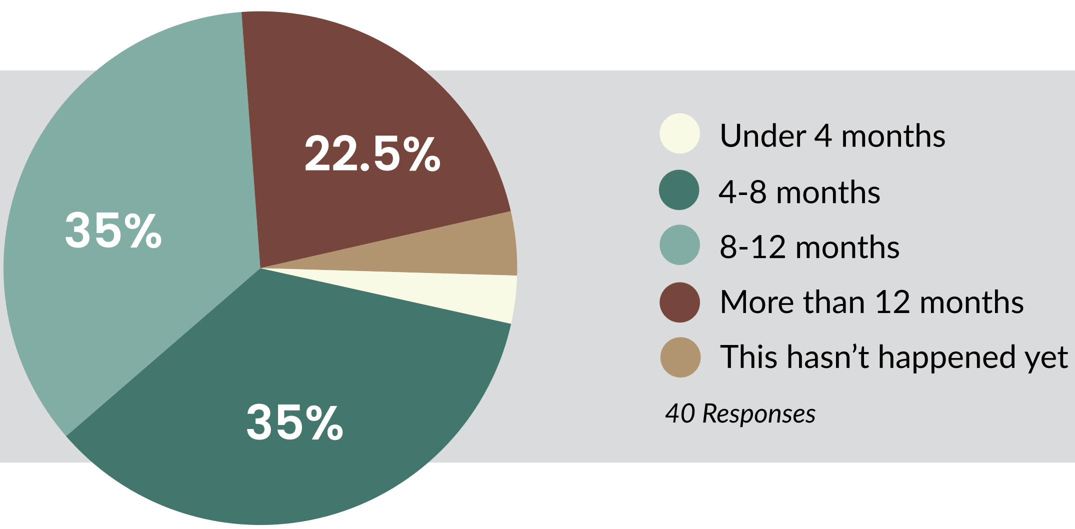
Survey Results

EPIC received 41 survey responses, representing 38 organizations, but one is removed from statistics because it was awarded in 2018 and extended. Organizations that had received multiple RCPPs were asked to either submit multiple responses if their projects were very different (e.g. one an Alternative Funding Arrangement and one a Classic) or to pick one of their projects that they felt was representative, if that was possible. The respondents seem to be a reasonably representative sample of partners: large and small, farmer-focused and environment-focused, NGOs and governments, and geographically diverse. Approximately 80% had Classics, and 20% had AFAs. Project start date was evenly distributed across the four years considered.

Programmatic Partnership Negotiation

The programmatic partnership agreement (PPA) is the general plan that USDA and the partner agree to that describes the work that is going to be done. Once partners receive notice that their application has been accepted, they begin negotiating this.

Approximately how long did it take your organization and USDA to go from award announcement to signature of your Programmatic Partnership Agreement (PPA)?

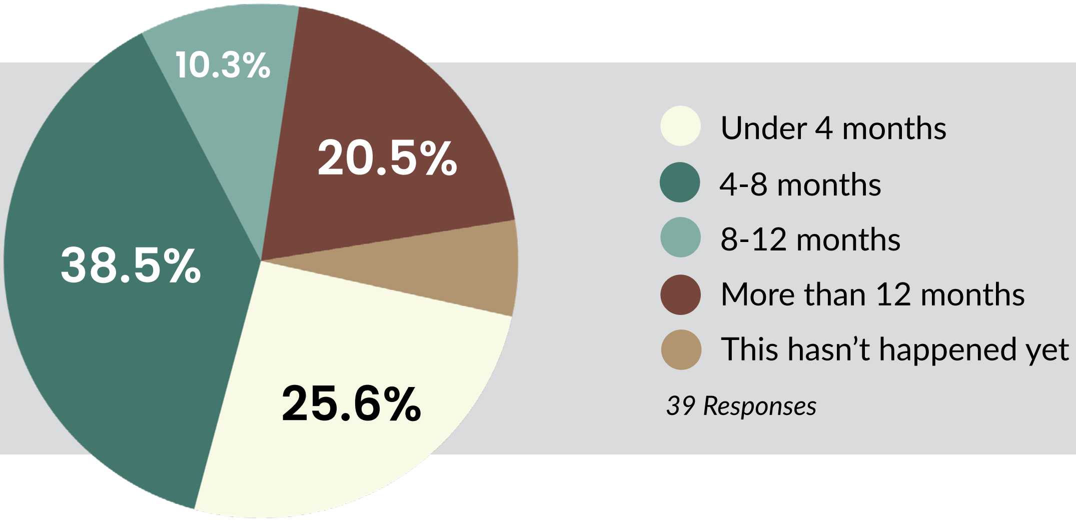


A clear but slight majority of awardees reported that developing their PPA took more than eight months, with just one project accomplishing this in less than four months.

Supplemental Agreement Negotiation

Once partners have a plan (PPA) that is signed by the lead partner and USDA, they then need to negotiate an approved budget and set of actions they will carry out under the plan (SA1).

Approximately how long did it take your organization and USDA to go from signature to signature of the Programmatic Partnership Agreement (PPA) to signature of Supplemental Agreement type 1?



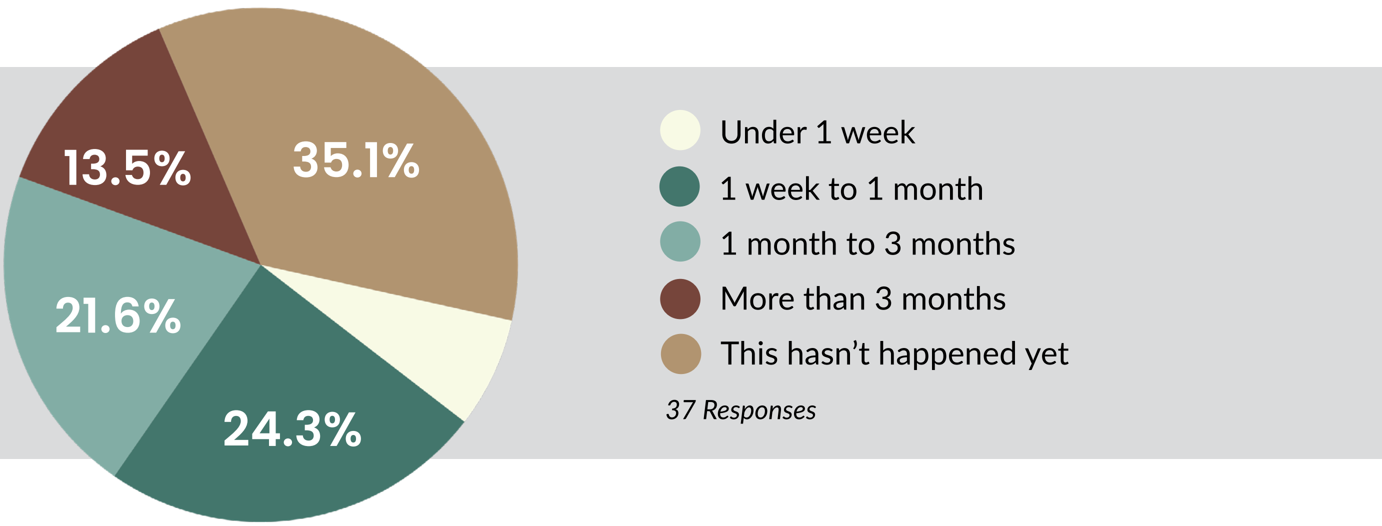
Approximately a third of partners reported that it took more than an additional eight months to complete their first supplemental agreement, but a quarter were able to get this completed in less than four months. Of the 23 who reported taking more than eight months to complete their PPA, twelve also took more than eight months to complete their supplemental agreement type 1.

These organizations worked for at least 16 months on completing USDA paperwork without any of the staff time being eligible for reimbursement.

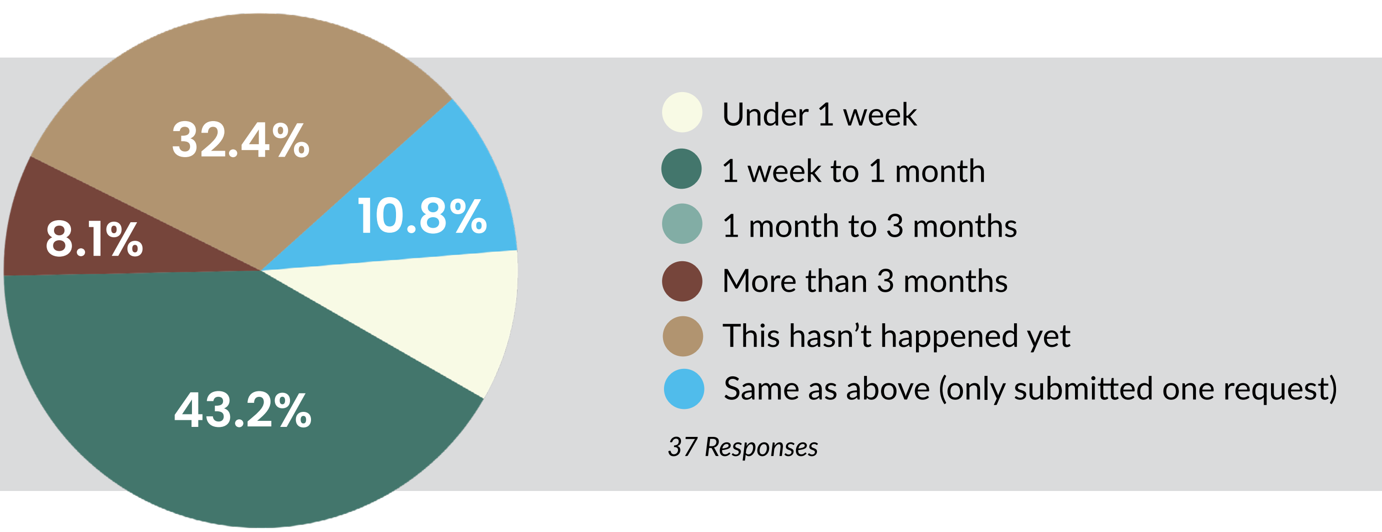
Reimbursement for Expenses Incurred

RCPP, like most USDA programs, operates on a reimbursable basis. After partnerships have their PPA and SA Type 1 approved, they can start incurring staff costs for working with producers. After these staffing costs are incurred, partners can be reimbursed for expenses by submitting a reimbursement request through the RCPP portal. For AFA projects, the process works similarly to be reimbursed for payments to producers.

Approximately how long did it take your organization and USDA to go from submission of your first ever payment to funds in your bank account?



Approximately how long did it take your organization and USDA to go from submission of your most recent payment request to funds in your bank account?

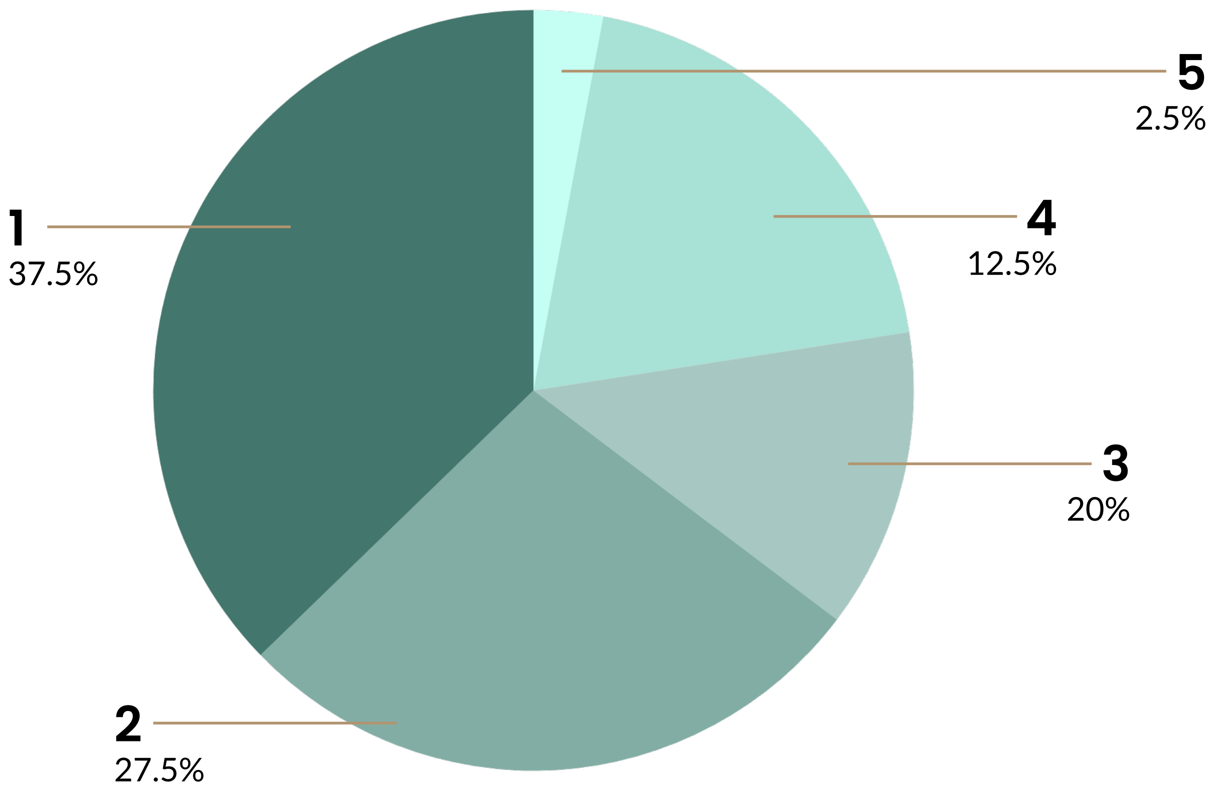


A third of awardees have still never seen any funding come to them–even though all projects were awarded at least a year before taking the survey. Some of these have not completed all agreements, while some have completed agreements but have not yet completed a reimbursement. 10% have only completed one reimbursement. The time it takes for reimbursements to occur seems to be decreasing between the first and most recent submissions, with the number taking a month or less going from 11 to 18 and the number taking over three months going from 5 to 3.

State Coordinator Turnover

Each state has a designated RCPP coordinator, who is partners' main point of contact. Partners may start working with these coordinators well before applying, as they develop a project concept. The coordinators then walk partners through all processes and answer questions along the way

How many RCPP coordinators have you worked with in your Lead State since you first communicated with NRCS about your proposal?

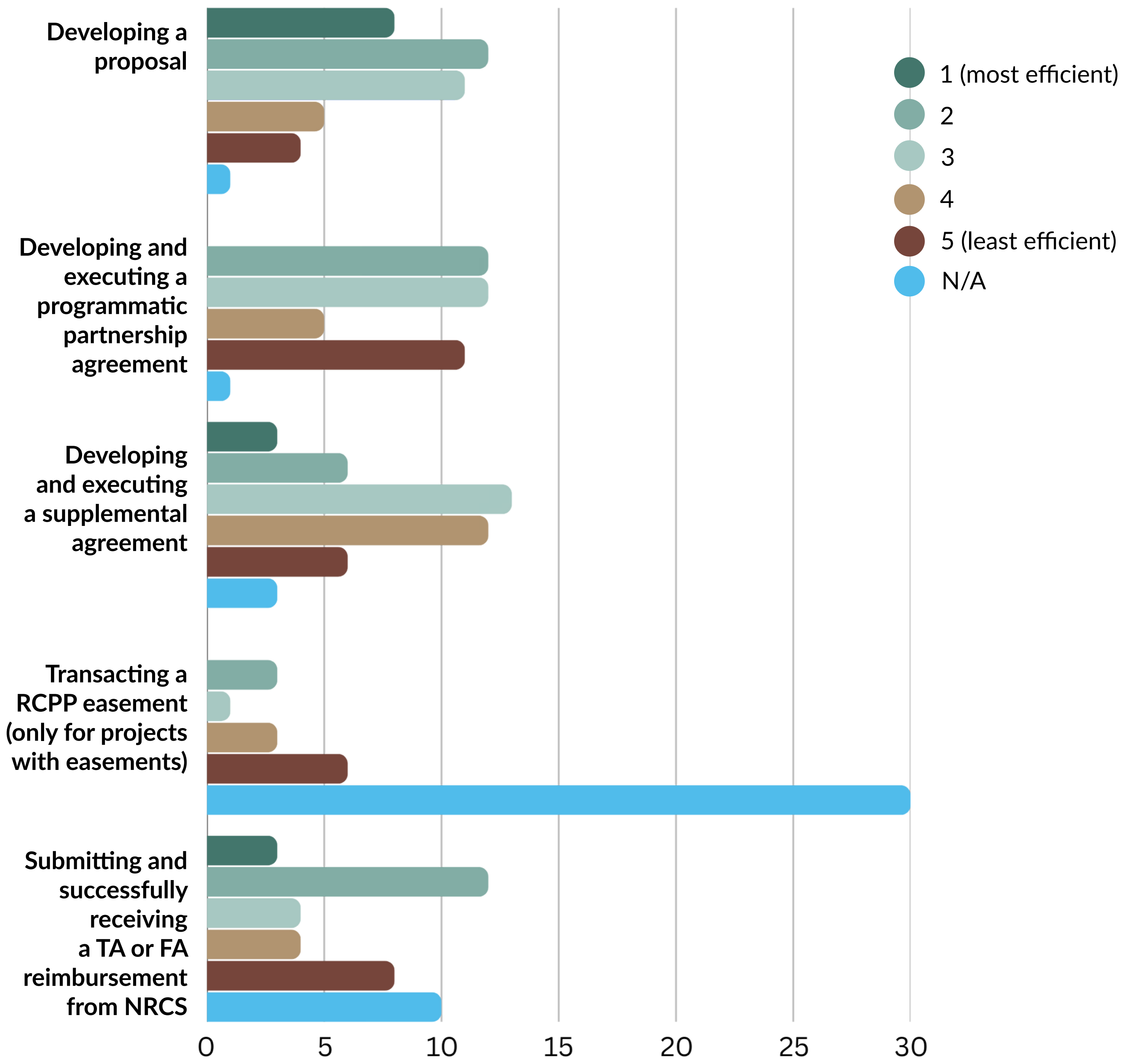


The average awardee reported working with 2.15 state RCPP coordinators, with about a third having worked with one, a third with two, and a third with three or more. Projects awarded in 2020 had a somewhat higher average of 2.64, while those awarded in 2023 had an average of 1.67.

Efficiency of Processes

From developing a proposal to getting paid for completed work, RCPP projects go through a many distinct processes before projects are in the ground and partners are compensated for getting them there.

Rank the following RCPP processes from most efficient to least

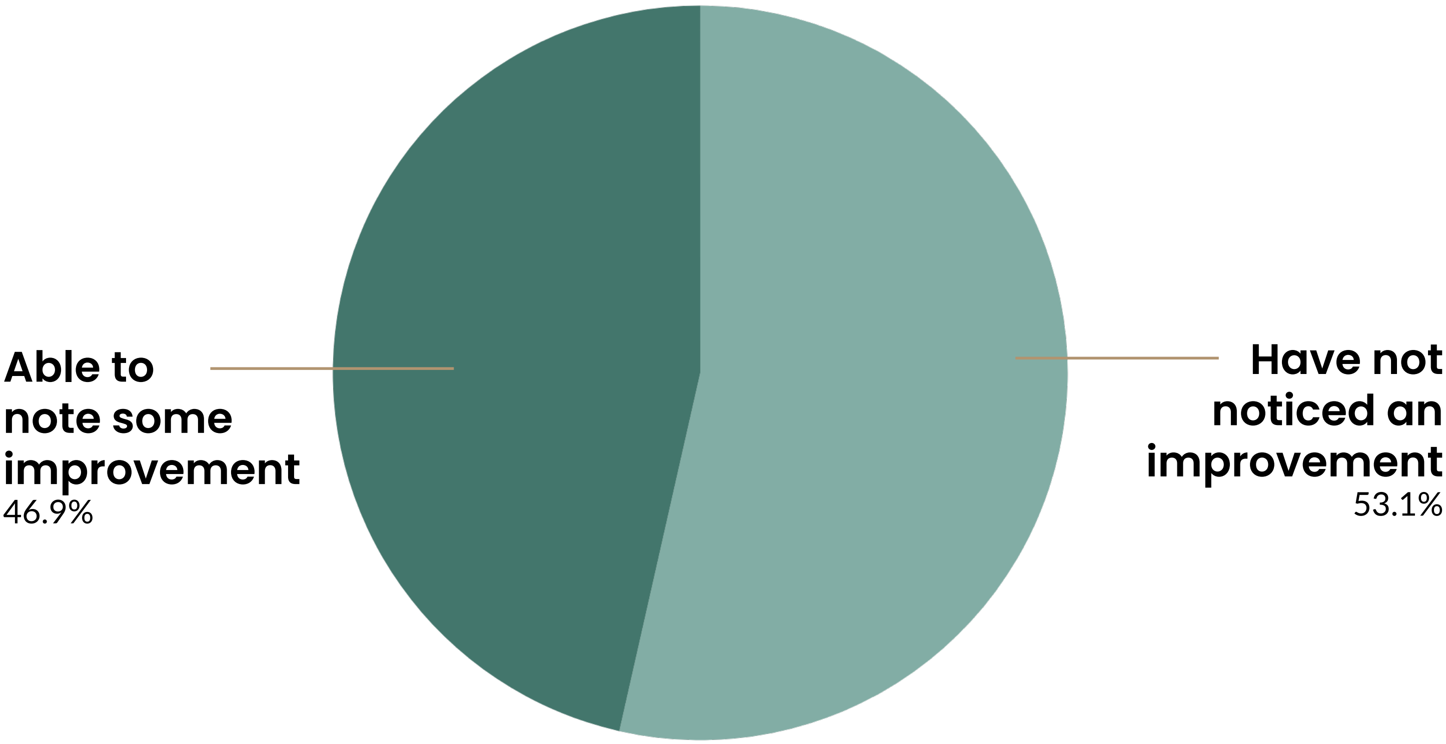


Participants in the survey generally found developing a proposal to be the most efficient process surveyed. On average, they viewed the development of the PPA and SAs as being similarly efficient to each other. Receiving a reimbursement was rated as slightly more efficient than development of agreements, but the distribution is bimodal, which is consistent with some awardees receiving reimbursement in less than a month and others struggling to get them at all. The small number of partners (11) who transacted an easement generally saw it as the least efficient part of the process.

Improvement Initiative

In spring 2023, NRCS leaders established internal RCPP improvement teams charged with soliciting partner and stakeholder feedback and recommending program enhancements and improvements. The first Notice of Funding Opportunity to include some of these program improvements was released in May 2023.

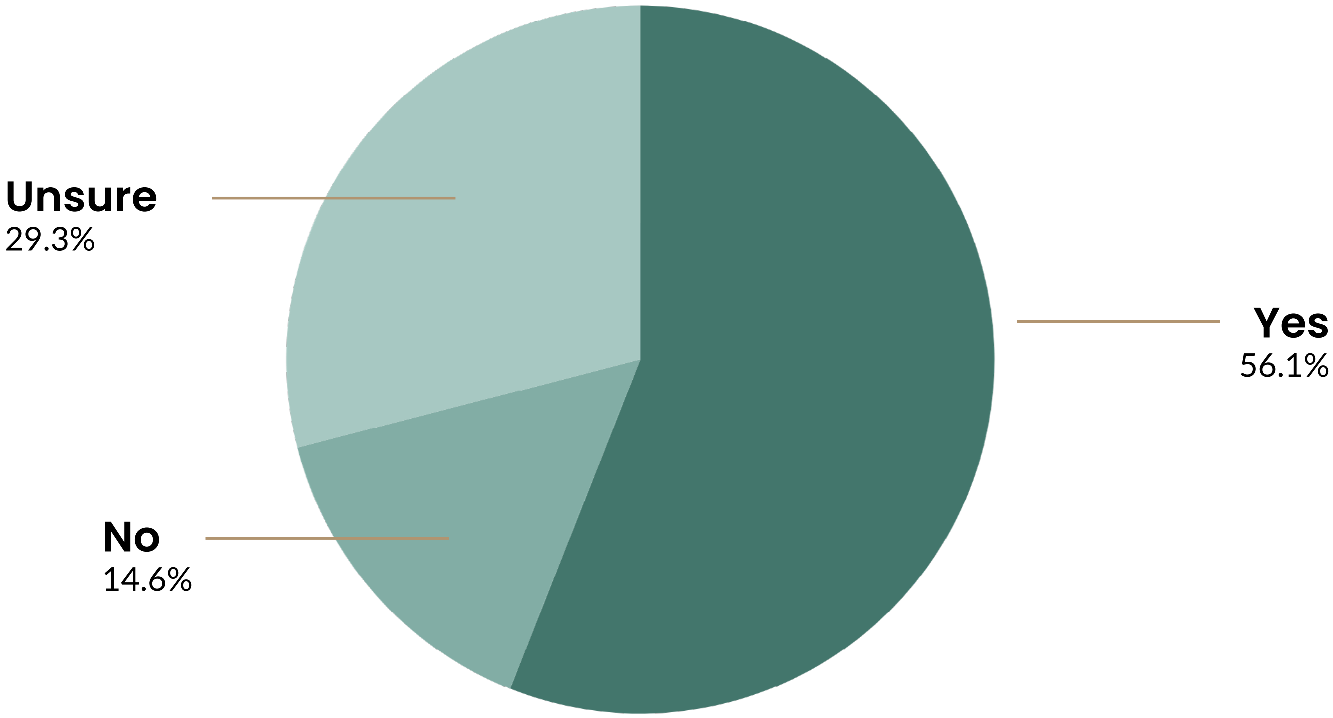
Since RCPP started its "RCPP Improvement Initiative" in spring of 2023, what tangible changes can you point to that have improved your RCPP experience?



Of the 32 partners who answered the question, approximately half were able to note a change they had seen since RCPP began its improvement initiative. The total number does not include answers like "That pretty much coincides with the start of our project". Of those who noted changes, some of the most common were about staff being more helpful due to training. But many of those who saw improvements in staff knowledge and those who had not noticed any improvements felt that there had not been "structural" changes to the program.

Repeat Applicants

Generally, whether an applicant would apply to a program again can be seen as one measure of its success.



A majority of partners would apply to RCPP again. Only six respondents outright said that they would not apply again. Generally, those who would apply again talked about how much of a difference the funds make in getting conservation on the landscape. Some who would apply again felt that it would be much easier now that they understood the program better. Those who were unsure or would not apply again pointed to the difficulty of contracting and the small amount of funding that can support the partner.

Recommended Improvements

Accelerate contracting

RCPP's complex agreement structure and review process often delays the start of projects, leaving partners struggling to align their budgets, manage project partners and resources, and engage producers and landowners. As noted in the survey results above, a non-trivial number of lead partners are unable to start their projects a year or more after the announcement of their award. Lead partners commonly spend more than sixteen months negotiating agreements, using staff time that is not reimbursable by NRCS, which can be a significant burden for awardees. While lead partners are excited and energetic on the day of award announcement, typically having already months since applying, they will likely have to wait another year or two to actually break ground because of PPA and SA negotiations, which hurts the program's reputation.

The current process is riddled with inefficiencies and adherence to an overly risk-averse agency culture. Contracting delays discourage participation from key groups who are particularly sensitive to administrative burdens and prolonged waiting periods, including urban and small-scale farmers, as well as the partners who serve them. While the survey did not request information regarding the size of organizations' budgets, it appears that smaller organizations were less likely to report a willingness to apply for RCPP again than more well-resourced organizations. Significant but simple reforms are needed to reduce bureaucratic barriers to ensure that projects can start within a reasonable timeframe after USDA announces awards

The solutions can begin with the proposal process. Some partners prior to 2023 reported feeling that proposal questions were redundant, while another noted improvements to the proposal as a noticeable benefit of the improvement initiative. Aligning proposal questions more closely with the information required to develop the PPA would ensure more appropriate projects apply and would streamline the process of going from award announcement to PPA. Additionally, the NoFO and RCPP website should provide explicit guidance of what will be required of partners when it comes to negotiating and executing RCPP agreements, helping frame partner expectations and reducing the potential for a mismatch after projects have been awarded.

Once projects are awarded, availability and consistent use of agreement templates and sample agreements by all NRCS state offices could play a helpful role in reducing delays. RCPP PPAs and SAs include bespoke terms and concepts that are unfamiliar to many partners. Partners expressed frustration with inconsistent guidance depending on which state was negotiating RCPP agreements—one state might provide helpful templates and even help fill out agreement exhibits, while another state leaves partners to complete it themselves before having to be approved (or not approved) by NRCS. Some partners expressed frustration with the inconsistency of templates provided, which they saw as failing to match the instructions provided to them by their state RCPP coordinators. A searchable repository of standardized templates would ensure partners have equitable access to helpful resources. These templates should cover all major components of the contracting process, including SAs (and ultimately payment requests), to minimize back-and-forth communications and expedite approvals.

NRCS staff should develop a network of experienced partners to serve as volunteer mentors to newly awarded lead partners, helping partners access advice and guidance from other partners who have successfully completed their agreement negotiations.

To address the challenge of prolonged negotiations and document reviews, NRCS should adopt a collaborative workshop approach to finalize PPAs more quickly. Often, partners and state RCPP staff meet once a week or once every two weeks for an hour during the negotiating period, which is not enough time to meaningfully make quick progress. Hosting two half-day or one day-long PPA workshop soon after the award announcement in which a partner and agency staff can sit together to draft agreement documents would eliminate much of the time lost to iterative reviews and delays. These workshops would foster direct communication, quickly resolve questions, and ensure both sides leave with a clear understanding of next steps. This approach would not only accelerate the process but also strengthen the working relationship between partners and agency staff.

To the extent that the back-and-forth negotiating remains, it could be beneficial to implement a centralized tracking system for documentation and approvals, such as exists for wetland mitigation bank approvals. Such a system would provide real-time visibility into the status of agreements, allowing partners and NRCS staff to monitor progress and identify sticking points. For instance, one interviewee described waiting a month for a state coordinator to review a document with national headquarters only to find out that it had never been shared with the national headquarters staff. In other examples, transparent tracking systems have added accountability and improved turnaround times by ensuring that tasks do not stall indefinitely on an individual's desk. Even if the system is not public to partners, it could be useful for NRCS to implement internally to spot bottlenecks in the process.

Two of the simplest, most impactful solutions would be to align application questions with the PPA requirements and then have a full-day workshop between local NRCS staff and a partner to draft most of the PPA soon after award.

By implementing these solutions, NRCS could dramatically reduce the time and effort required to move from project award to implementation. The changes throughout this section would not only ensure that conservation work begins promptly but also improve partner satisfaction, ultimately achieving the program's goals with greater efficiency and impact. Accelerating contracting is not merely a procedural improvement—it is essential for the success of the program.

Delegate to local authority

All RCPP projects are managed by NRCS state offices. But many survey respondents expressed frustration that the agreement negotiation and execution process required heavy oversight from RCPP staff at NRCS's national headquarters. A substantial amount of time during the negotiation period is dedicated to national headquarters' reviews of every RCPP agreement (PPA and SA) that is drafted and executed at the state level. One way to accelerate both contracting and other processes is to delegate more decision-making authority to local levels–State Conservationists and state RCPP coordinators–rather than national headquarters.

Such frequent reviews were understandable in the early years following passage of the 2018 Farm Bill, which created not just a completely transformed RCPP but also new agreement types at NRCS, PPAs and SAs. As time has passed, however, and states have gained experience with negotiating and executing PPAs and SAs, maintaining full reviews of every RCPP agreement has turned into a key obstacle to timely execution of agreements.

With a federated agency, such as NRCS, National Headquarters staff are designed to develop program policies and procedures and then to provide training and guidance so that state and local staff can implement those policies and procedures. Following up with oversight then checks the work carried out at lower levels. Headquarters staff could spend more time developing more comprehensive and finely tuned guidance (such as standardized template documents) and more training and oversight, if they did not have to review every agreement negotiated at the state level. The agency will never remove all risk from RCPP, but shifting risk down to partners and state staff, while providing additional training, guidance and oversight to minimize that risk, would lead to a more efficient and partner-friendly program.

One major challenge the agency has faced is a startling amount of turnover among state RCPP Coordinators. One way to empower states while still helping inexperienced coordinators would be to make agreement reviews voluntary. States with experienced staff that feel confident could negotiate and execute agreements on their own, while states with new or inexperienced coordinators could request more national headquarters involvement.

With so much hand-holding from the national level, NRCS state staff do not feel empowered to manage projects with partners. Survey respondents highlighted what they saw as inefficiencies in communication between state and national NRCS offices. State coordinators are reluctant to make decisions or interpretations without checking with national headquarters staff, slowing negotiations and frustrating partners who are often on the receiving end of a decision from someone with whom they never have a chance to talk or negotiate. Offering reservable “office hours” appointments with national headquarters staff that partners could attend with state staff would help make it seem less like the “black box” at national headquarters is making key decisions. Further streamlining communication channels and providing state coordinators with greater autonomy to resolve issues would improve response times and program effectiveness. This could include encouraging more informal phone calls between state staff and partners (as opposed to scheduling a meeting in a week) to facilitate faster, more transparent communication.

As NRCS regularly acknowledges, state office staff are uniquely positioned to understand the specific needs of their communities and the operational realities of projects in their states. However, their ability to manage and administer RCPP is limited in the current headquarters-dominated environment. Delegating more authority to local actors, improving guidance, and enhancing communication processes are essential steps for making the program more responsive and effective. By empowering district conservationists and state coordinators with the training, tools, and autonomy they need, NRCS can foster a more decentralized and efficient approach to program administration that better serves partners and their communities.

Simplify financial transactions

The administrative complexity of RCPP’s financial processes was one of the most commonly mentioned issues by partners, who anecdotally report spending excessive amounts of time navigating the current system. This issue is particularly acute in the payment request process, through which partners request reimbursement from NRCS for completed project activities. Survey respondents pointed to challenges with the RCPP Portal and redundant requirements for submitting reimbursement requests. One partner described a single payment request taking over 20 staff hours due to excessive data entry requirements. Partners note that this not only wastes valuable time and staff costs but is particularly bad for the morale of conservation practitioners who expect and prefer to spend time working with farmers and ranchers and in the field.

One of the key opportunities for improvement is the NRCS portal used for financial transactions. By redesigning the portal to streamline and consolidate information fields, NRCS would help users avoid repetitive entry of identical data across funding periods. An improved portal should present data in a logical and user-friendly manner, eliminating confusion caused by rows of unorganized numbers and deliverables. Simplifying the interface and adopting automation tools to prepopulate recurring fields would significantly reduce the administrative burden on program participants.

NRCS allowing advance payments to partners is another frequently requested change by survey respondents. However, this functionality is not likely without legislative encouragement, at least partially because partner payments are being made using manual processes. This manual process is labor-intensive, requiring state coordinators to manually complete payment checklist forms before submission to the business center for review and processing. Automating this process—by connecting some version of the portal to USDA's financial system--would be essential to enable features like advance payments while ensuring efficiency and accuracy.

How to simplify financial transactions:

1. Adopt user-centered design for the portal
2. Reduce PPA rigidity
3. Clarify administrative expense rules
4. Allow self-certification of compliance

Ultimately, the common thread in these recommendations is the fiscally-prudent need to simplify and streamline the program's financial transactions. By adopting a user-focused design for the payment portal, reducing PPA rigidity, clarifying compliance expectations, and allowing self-certification, NRCS can create a system that better supports its partners. These changes would free up resources for innovation and impact, ensuring that the program delivers on its mission with greater efficiency and effectiveness.

Support flexibility and innovation

RCPP's adaptability remains one of its greatest assets, and NRCS has an opportunity to enhance this flexibility as the program becomes more efficient in its core operations. In particular, Alternative Funding Arrangement projects are a key avenue for fostering innovation, allowing partners to introduce in-office innovations (e.g. how payments are made) that, over time, can inform updates to the NoFO and processes. By explicitly recognizing these innovations, NRCS can expand options available to partners. For instance, as performance-based payment models grow in popularity—particularly in emerging environmental markets like biodiversity—NRCS will need to adapt its guidance to support these projects effectively.

Performance-based payments provide financial assistance to producers based on a dollar figure per provision of a unit of environmental outcomes, such as $100 per ton of carbon sequestered or $30 per pound of nitrogen prevented from entering waterways. This can allow USDA to target the most cost-effective projects. And by creating a single unit (e.g., dollar per pound of nitrogen) that can be compared against different proposals, it becomes clearer to decision-makers which projects should be funded. Additionally, when operating correctly, that structure reduces administrative burdens and allows farmers the flexibility to create new, better ways of generating those outcomes. While NRCS researchers and decision-makers have discussed the benefits for performance-based payments for decades, RCPP is currently the only conservation program with a statutory basis to use them on private lands.

Performance-based payments could be better supported by returning to awarding priority points for innovative projects in the application process. Beyond that, there is more that could be done to adjust existing processes to accommodate this emerging way of paying for conservation results. While some survey participants wanted the NoFO to clarify that projects can exceed five years with Secretarial approval, the most recent NoFO now states "RCPP projects typically last 5 years. Applicants may request a PPA length that is longer or shorter than 5 years but must submit a justification for the proposed length." Among other benefits, this flexibility is often necessary to pay for outcomes generated from structural practices. It should also emphasize that payments exceeding cost-share rates are permissible if tied to established environmental markets. Furthermore, NRCS's current approach of requiring equal annual payments for performance-based payments to producers implementing structural conservation practices should be reconsidered to align with the reduction in risk of outcomes not being generated; in other words, about half of the payment should be made when the structural practice is successfully constructed.

The common need to adjust elements of project implementation while a RCPP project is ongoing is a recurring concern and source of frustration for partners. At least for existing projects, shifting funds between categories, such as from technical assistance (TA) to financial assistance (FA) or between TA-I and TA-E, requires formal PPA amendments. This process is both time-consuming and rigid, limiting the agency's ability to adaptively manage projects and the dynamic needs of partners' projects. Introducing mechanisms for internal adjustments that do not require formal PPA amendments would streamline operations and reduce partner friction. For example, allowing up to 10% of funds to be moved from TA to easement acquisition with just a letter to the agency—as is common in other federal grant programs--would give partners the flexibility to address emerging priorities without unnecessary administrative delays.

While recent NoFO updates have begun addressing these challenges—such as breaking down the barriers between TA-E and TA-I—more can be done to cover the real costs of implementing RCPP without strict categorization. Future NoFOs could explicitly permit TA funding to cover activities like easement due diligence, including appraisals, surveys, and hazardous material searches. Although NRCS has historically resisted using TA funds for due diligence in programs like ACEP-ALE, RCPP's unique structure includes TA funding as an integral component of each project. This adjustment would not only address practical cost concerns but also serve as a positive incentive for the easement community, which has voiced ongoing challenges with the program.

Some partners felt strongly that NRCS limits flexibility related to conservation practices and practice standards, while others were adamant that NRCS state staff do a great job of being flexible with conservation practice standards to accomplish the partners' project goals. Differing survey responses show substantial variation among NRCS state offices and staff when it comes to willingness to flex conservation practice standards and specifications to meet partner requests. Simple communication from NHQ to state conservationists of encouragement to stretch practices for RCPP partners or of case studies in which this has been successfully done could increase otherwise-hesitant staff's willingness to be flexible with practice design.

By addressing these challenges, NRCS can build on RCPP's inherent strength, creating a more flexible, innovative, and partner-friendly program. The result would be a system better equipped to meet the evolving needs of conservation projects while fostering greater collaboration and trust among partners.

Possible Statutory Changes

The scope of this report is limited to administrative changes, especially those NRCS could implement through NoFOs or agency guidance. But some of the identified issues must, and others could be further, addressed with changes to the underlying statute of RCPP. In December 2024, Congress extended the 2018 Farm Bill through September 2025, and it continues to be unclear when a new Farm Bill that would make substantive changes to RCPP might pass.

In 2024, both the House and Senate Agriculture Committees released bill drafts that seek to make some improvements to the program. Both create time limits on how long NRCS can take to develop PPAs and to reimburse partners for eligible expenses. The Senate and House drafts both also create an allowance for some portion of the funds to be used on administrative expenses. And both bills bring the "certified entity" concept from USDA's Agricultural Conservation Easement Program to RCPP, allowing easement holding entities that have gone through a certification process to take advantage of streamlined easement processing and closure procedures.

The House bill makes relatively few changes to RCPP compared to the Senate bill. The most impactful is to revert the mechanics and administration of RCPP Classic projects back to the way the program operated under the 2014 Farm Bill. This would require the agency to overhaul most of the program again, which would likely lead to more delays.

Many of the Senate's changes are in the AFA section, while almost none of the House's are. It creates some new definitions and authorities to encourage NRCS to be more comfortable with performance-based payments. Looking to the program more broadly, the Senate bill provides some funding to be used on improving IT tools like the portal, particularly to automate payments.

Both include even more changes, but these are some of the most impactful. Most of these changes would help address the concerns that partners expressed about RCPP. While the administrative changes described are urgently needed, these and other legislative changes could be complementary.

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