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## **Allocation Rationale**

In its consideration of fair, transparent, and objective approaches to solicitation of shortage area nominations, NIFA evaluated three strategies. The first option considered no imposed limits on the number of nominations submitted. The second option was to allow each state the same number of nominations. The third (eventually selected) was to differentially cap the number of nominations per state based on relevant criteria.

### **OPTION 1: Provide no limits to the number of nominations per state.**

This option provides each state and insular area equal opportunity to nominate as many situations as desired. However, funding for the VMLRP is limited relative to anticipated demand, so allowing potentially high and disproportionate submission rates of nominations could unnecessarily burden nominators and reviewers with large, unwieldy numbers of nominations and dilute highest need situations with lower need situations. Moreover, NIFA believes that the distribution of opportunity under this program (i.e., distribution of mapped shortage situations resulting from the nomination solicitation and review process) should roughly reflect the national distribution of demand for food supply veterinary service. Without a cap, correlation between the mapped pattern and density of certified shortage situations and the actual pattern and density of need is unlikely. This in turn could undermine confidence in the program with Congress, the public, and other stakeholders.

### **OPTION 2: Allocating the same number of nominations to all states and insular areas.**

This option suffers from some of the same disadvantages as no limits but has the benefit of limiting administrative burden on both nominators and reviewers. However, there would be no correlation between the mapped pattern of certified shortage situations and the actual pattern of need. For example, Guam and Rhode Island would be allowed to submit the same number of nominations as Texas and Nebraska, despite the large difference in the sizes of their respective animal agriculture industries and rural land areas requiring veterinary service coverage.

### **OPTION 3 (selected): Cap the number of nominations based on major parameters correlating with veterinary service demand.**

This option controls administrative burden to the states and NIFA and leads to a mapped pattern of certified nominations that approximates the actual shortage distribution. In addition, this option limits dilution of highest need areas with lower need areas. The disadvantage of this option is the lack of a validated, direct measure of veterinary shortage. Therefore, parameters approximating the need for veterinarians had to be identified.

The two variables used to estimate the need for veterinary services, “Livestock and Livestock Total Sales (\$)” and “Land Area” (acres), most strongly correlated with state-level food supply veterinary service need and were selected in consultation with the National Agricultural Statistics Service ([NASS](#)). The “Livestock and Livestock Products Total Sales (\$)” variable broadly predicts veterinary service need in a state because this is a normalized (to cash value) estimate of the extent of (live) animal agriculture in the state. The state “land area” variable predicts

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veterinary service need because there are positive correlations between state land area, percent of state area classified as rural, and the percent of land devoted to actual or potential livestock production. Additionally, land area is directly correlated with the number of veterinarians needed to provide services in a state because of the practical limitations of a standard mobile veterinary practice.

Although these variables are not perfect predictors of veterinary service demand, NIFA believes they account for a significant proportion of the most relevant factors influencing veterinary service need and risk. To further ensure fairness and equitability, NIFA ensures that every state and insular area is eligible for at least one nomination and that all states receive an apportionment of nominations relative to their geographic size and size of agricultural animal industries.