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August 9, 2011

Ralph Otto  
Deputy Director  
National Institute of Food and Agriculture  
c/o Matthew Lockhart  
Senior Policy Specialist  
Policy and Oversight Division  
U.S. Department of Agriculture  
800 9<sup>th</sup> Street, SW, Room 3107  
Washington, DC 20024

RE: Comments for USDA/NIFA Regulatory Information Number (RIN) 0524-AA39

Dear Mr. Otto:

On behalf of the Hispanic Association of Colleges and Universities (HACU), I am pleased to submit comments on the proposed rulemaking for the Hispanic-Serving Agricultural Colleges and Universities (HSACU) Certification Process. I wish to thank you for your continued support of Hispanic-Serving Institutions (HSIs) and for your help in advancing the development of HSACUs.

HACU has a membership of more than 400 institutions representing the nation's 307 Hispanic-Serving Institutions and nearly 200 other two- and four-year colleges and universities committed to Hispanic higher education, including more than 40 international members.

We strongly support the regulations as proposed and wish to make a few comments that we feel would make the process stronger.

First, given the changing demographics of Hispanics and of HSIs throughout the country and in order to give as much access as possible to students in as many locations as possible, we strongly recommend including institutions from Arizona and Colorado on the list of HSACUs. These two states are home to a number of HSIs that offer degree programs in agriculture-related fields.

Second, we propose that when determining the colleges and universities that qualify, the United States Department of Agriculture (USDA) use current HSI data to determine the number of Hispanic students who received degrees in agriculture-related fields. For example, we would recommend using FY2011 HSI numbers for the FY2012 cycle.

Third, recertification of HSACUs on an annual basis will create an undue burden on HSACUs. We recommend that the recertification process be changed to every five years rather than every year. We also recommend that the process remain open every year to allow colleges and universities that have recently qualified for HSI status to apply for HSACU status.

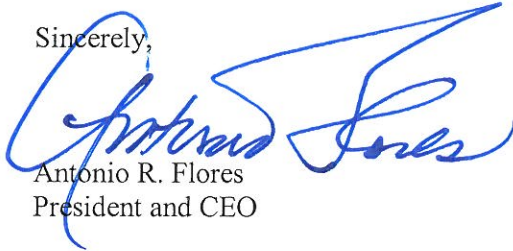
Finally, we think the NIFA should pay special attention to the number of HSACUs receiving certification. Given the limited resources available for colleges and universities, constraining the number of designated

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schools would optimize funding opportunities for HSACUs. As appropriations for HSACUs may increase, the number of certified HSACUs could also be expanded accordingly.

Thank you for the opportunity to provide input on the HSACU certification process. We look forward to our continued collaboration on behalf of HSIs and the students they serve.

Sincerely,

A handwritten signature in blue ink, appearing to read "Antonio R. Flores". The signature is fluid and cursive, with a large initial "A" and "F".

Antonio R. Flores  
President and CEO

cc: HACU Governing Board Members