

YCA Round 4 Solicitation - Response to Public Comment Period - 09/21/2026

Topic	Sub-Topic(s)	CNRA Response
Competitive Grant Process	Scoring Criteria - Request to expand Proposal Design & Project Impact with more evaluative criteria, including evidence supporting their proposal; request for clarification on the role of project partners; request to clarify how organizational capacity will be reviewed and how it may affect smaller nonprofits	Based on questions and feedback received related to the Scoring Criteria, particularly as it relates to proposal design, project impact, and organizational capacity, updates have been made in the following areas: 1. Organizational Capacity has been removed as a competitive criteria. While organizational capacity is critical in order to responsibly and effectively manage State/public funds, CNRA will screen Organizational Capacity prior to finalizing awards as needed. Organizational Capacity has been added as an additional factor under "Other Funding Considerations." Although this has been removed as a competitive criteria, potential applicants should read the guidelines carefully, in particular the Grant Administration section, to ensure they have the organizational and fiscal capacity to carry out the grant and its requirements. If there is any concern in this area, CNRA strongly encourages the use of a Fiscal Sponsor. 2. With the removal of Organizational Capacity, the categories of Proposal Design, Project Impact, and Project Readiness have been reorganized. Proposal Design and Project Readiness have been combined into one scoring category, and Project Impact is now its own. Minor content updates have been made as a result of this reorganization. Please read these sections carefully. 3. The Concept Proposal Form questions have been updated to reflect the reorganization as well as respond to other feedback: - For Project Readiness, Question 16 has been added, which asks applicants to list all known project partners and how they are involved. - For Project Impact, Question 20 in the Full Proposal now includes language related to "relevant data and supporting evidence to explain the design and proposed plan for implementation, including but not limited to evidence-based research, community input, quantitative and/or qualitative evaluation metrics, and previous successful implementation of similar programs."
Concept & Full Proposal Forms	Page Limits & Content - Request for clarification on page limits; Feedback about previous application questions being burdensome and redundant.	CNRA evaluated previous rounds and made significant updates to the Round 4 Draft Guidelines to streamline the solicitation process, most notably by reducing the application phases from three to two, creating a brief Concept Proposal application, and removing some inadvertent redundancy. We are optimistic that applicants will find our new process easy to complete. To ensure applicants provide only the most critical information needed and thus reduce the applicant's burden, the Concept Proposal and Full Proposal Forms will be a fillable PDF with space limitations based on the applicable question. The Proposal Forms represent the entirety of the application and the information required - additional supporting documentation will not be needed nor requested. To ensure applicants have adequate space to directly respond to questions, additional pages will be allowed as follows: - For the Concept Proposal, one additional page as needed is allowed to be uploaded with the form. - For the Full Proposal, three additional pages as needed will be allowed. Additional pages that exceed the max and/or supporting documentation not requested will not be reviewed or considered.

Eligible Activities	Cultural Resource Activities - Request to allow Music & Storytelling as eligible activities	The final guidelines have been updated to include music and storytelling activities as eligible cultural resource activities, if they are part of a cultural festival or other event in which the purpose is to provide educational experiences related to cultural and historical practices. Paid admission to commercial venues is prohibited.
	Educational Programming - Request to include school-based delivery as eligible setting	The final guidelines do not highlight or call out any particular setting or delivery method related to educational programming. There are no limitations or exclusions set in the guidelines regarding where or how the educational programming is delivered. School districts are eligible to apply for funding for school-based programs, including classroom-based curriculum that includes a field trip or field work component.
	Cultural Resource Activities - Request to include Traditional Ecological Knowledge, cultural burning, and Indigenous foodways	The final guidelines have been updated to clarify that TEK tribal land stewardship practices are eligible as either cultural or natural resource activities.
	Field trip locations - Request for clarification if county-owned land is eligible; request for clarification regarding land or property that is not owned by organization.	There are no restrictions regarding land ownership, other than ensuring that all necessary permits and agreements related to access and use are in place between the parties prior to grant approval.
	Natural Resource Activities - Request to clarify eligibility regarding school-based gardening program and gardening activities; request to include urban agriculture sites and urban farms; request to include agroecology activities.	The final guidelines have been updated to clarify what types of land stewardship activities are eligible. Urban agriculture sites, agroecology, regenerative agriculture, sustainable farming, and other land stewardship practices are eligible natural resource activities. Additionally, school-based and community-based gardening programs that include an educational programming component related to agriculture, sustainable farming, and other land stewardship activities are eligible for funding. General or stand-alone gardening activities that are not part of a field trip to a stewarded land or do not include a meaningful educational component are not eligible.
Eligible Applicants	Funding Priorities- request to prioritize community-based nonprofits led by people of color	Due to the nature and intention of the funding, no particular type of applicant will be prioritized. All eligible applicants will have an equal opportunity to apply, and the funding priorities will focus on the youth being served and the content of the program.
	Organizational Capacity - request for specialized Technical Assistance for smaller nonprofits and request to reduce minimum award amount	CNRA will provide multiple opportunities for Technical Assistance during the solicitation period. In addition to two traditional workshops, the YCA team will offer five Office Hours sessions to provide more focused and intentional guidance to potential applicants. To support smaller nonprofits' efforts, the final guidelines have been updated to reflect a reduction in the minimum application amount, from \$50,000 to \$30,000.
	Nonprofit Qualifications - Request to clarify how fiscal sponsors may be used and if subgranting/passthroughs are possible	The final guidelines have been updated to further clarify that fiscal sponsors are allowed, however fiscal passthroughs and sub-granting are not. A definition for Fiscal Sponsor has been added to make clear that a nonprofit that does meet the eligibility requirements and/or does not have the fiscal capacity to implement the grant may use a Fiscal Sponsor. An ineligible nonprofit partner can then be responsible for implementation of the project, but Fiscal Sponsors are the grantee of record and are responsible for all grant administration requirements. A Fiscal Sponsor cannot subgrant the award or act simply as a financial passthrough.

Eligible Costs	Direct Cost & Indirect Cost Allowances - Request to expand direct costs to include operational and overhead expenses necessary for the program; request to clarify staff rates	CNRA understands that there are many costs associated with running a program and implementing a state-funded grant. We try to be as inclusive as possible when capturing eligible costs while following strict State regulations related to the distribution of public funding. CNRA is unable to modify or expand the definitions of direct costs and indirect costs as outlined in the YCA guidelines. Direct costs are defined as the necessary costs to carry out the specific grant-funded project, including materials, supplies, equipment, consultants and subcontractors, and implementation labor. Staff labor rates may include employer-paid benefits but cannot include an additional indirect rate attached. Direct costs do not include general administrative and overhead costs. Indirect costs are defined as the administrative costs associated with the operation of the organization. These include all costs shared by multiple operational and programmatic functions of the organization, including utility bills, rent, general supplies, and overhead costs associated with Information Technology, Human Resources, Accounting, and Executive Administration. Staff labor from these shared functions can be apportioned to the indirect rate as part of a Cost Allocation Plan or other methodology. If a grantee believes that an expenditure that has been identified by CNRA as an indirect cost should be a direct cost, CNRA will review the documentation and identify potential solutions, when possible. In an effort to support the organizations that apply for YCA funding, the final guidelines have been updated to reflect an increase in the Indirect Cost percentage allowed for the program. It has been increased to 20% from 15%.
Eligible Youth Population	Disadvantaged Community Tool Questions: - What if we have multiple program sites or multiple youth service areas? - What if our organization is not located in a DAC but the youth participants are? - Do both Disadvantaged and Severely Disadvantaged Communities shown in the tool meet the eligibility requirements? -MHI and HHMI terminology - Concern that entering a single address, rather than certifying that 80% of youth meet DAC requirement, narrows the eligibility field.	The funding source for the YCA grant program mandates that CNRA serve youth from low-income and disadvantaged communities. The eligibility screening criteria and tools used for the program therefore must include Disadvantaged Community elements. CNRA understands that this requirement may exclude some potential applicants or present technical challenges when using the screening resources provided. We have made every effort to streamline this requirement and many of the changes we have made for Round 4 are intended to be expansive, not limiting. For example, by removing the requirement to certify that 80% of youth served are located in a DAC, there should be significantly less administrative burden to individually track each youth, which presents both logistical hurdles and privacy concerns. Our goal is to make this eligibility screening as simple as possible for both applicants and CNRA by focusing on entering a location or locations that best represent the DAC status of the youth. Based on the questions and feedback received, we have updated the DAC language and requirements in the final guidelines to bring further clarity in service to this goal, as follows: 1. In reviewing the available tools for determining if a specific address is located in a DAC, we found that the Statewide Programs Community FactFinder is a more user-friendly platform for applicants. We have removed the requirement to use the Climate Bond Disadvantaged Community Tool and replaced it with the FactFinder tool. This should remove confusion around the definition for Disadvantaged Community, the difference between Disadvantaged and Severely Disadvantaged, and the difference in terminology used (Median Household Income, or MHI, and Household Median Income, or HHMI). 2. We have further clarified the language in the DAC section to state that the applicants must use an address or addresses that demonstrates their proposal primarily serves youth from a DAC, and should select the address or addresses that best represent the communities in which youth participants reside and/or a location common to the majority of youth to be served. We do not require that applicants identify or record every potential youth participant's address. The address or addresses chosen must be a good faith effort by the applicant to demonstrate that youth participants are from a low-income and disadvantaged community as defined in the guidelines. 3. We have refined the instructions on how a location should be selected to account for organizations that may be located in a different area than the youth they serve, and to account for organizations with multiple program sites or youth service areas. Applicants will be responsible for explaining why and how the addresses were determined.

Funding Priorities	Underserved Youth Population - Request for clarification on definition of "parkland" as it relates to Park-Poor Communities	The final guidelines have been updated to clarify that "parkland", which is a term used within the definition of a Park-Poor Community, comes from the underlying data source utilized by the Statewide Parks Program Community FactFinder, which is the California Protected Areas Database (CPAD). CPAD "is a GIS dataset depicting lands that are owned in fee and protected for open space purposes ...CPAD depicts the wide diversity of parks and open spaces in California, ranging from our largest National Forests and Parks to neighborhood pocket parks." Note that applicants are not required to research and/or utilize CPAD for the purposes of identifying a Park-Poor youth population. Entering the address or addresses into the Community FactFinder tool will indicate if the location has been designated as Park-Poor.
	Underserved Youth Population - Request for clarification regarding foster youth language	The final guidelines have been updated to clarify how foster youth is defined and to ensure it captures all youth who have experienced the foster care system. The updated language is now "current and former youth in foster care."
	Youth Leadership Opportunities - Request for clarification/additional guidance for frequency	The final guidelines have been updated to reflect that youth leadership opportunities should be frequent and ongoing and cannot be one-time experiences.
	Request to prioritize tribal co-design	CNRA places critical importance on tribal outreach and requires collaboration with the tribe if a proposal will affect a tribal community, however prioritizing tribal co-design as a competitive criteria is outside the objectives of the program.
	Underserved Youth Population - Observation that language around "communities struggling with widespread substance use and addiction" may be vague/does not include definition. Concern that this could capture legal substances and that applicants can respond in various ways.	The application includes specific questions related to how an Underserved Youth Population is identified based on the definition in the guidelines. This includes a prompt to include any tools used to determine that the youth population meets the definition and any relevant data/evidence to support the submission. Applicants will be relied upon to provide evidence of their experience and expertise as it relates to the youth they serve. For all eligible youth populations, including those that live in communities struggling with widespread substance use and addiction, CNRA will evaluate the response and supporting data and it will be scored competitively based on the scoring criteria outlined in the guidelines.
	Underserved Youth Population - Request to add youth experiencing homelessness	The final guidelines have been updated to include youth experiencing housing insecurity or homelessness as part of the Underserved Youth Population definition.
	Underserved Youth Populations - Request to include youth affected by federal immigration enforcement policies	CNRA is unable to incorporate this request into our state-funded grant program.
	Other Funding Considerations - Request to remove "geographic distribution" as an additional factor when considering final awards	In all competitive grant programs, CNRA leadership may consider additional factors for funding outside the explicit competitive scoring criteria outlined in the guidelines to ensure the grant award process is unbiased, equitable, and reasonable. To ensure equity in funding between rural and urban areas, as well as between North, Central, and South regions of the vast state of California, CNRA must factor in geographic location prior to finalizing grant awards. Geographic consideration ensures that less resourced and less populous regions have an opportunity to receive needed grant funding in the event there is a large imbalance.
	Underserved Youth Populations - Request to include youth from farmworker families	Farmworkers as a category will not be added to the definition of underserved youth population, however there are other ways in which farmworker youth may qualify, including being from a Park-Poor community, experiencing housing insecurity, or meeting one of the other youth populations specified.
	Substance Use Prevention and Early Intervention Practices - Request to expand definition for tribal communities	CNRA recognizes that the original definition heavily relied on modern, Westernized language and terminology. The final guidelines have been updated to reflect that Indigenous healing practices are also acceptable.
	Substance Use Prevention and Early Intervention Practices - Opposition to including substance use prevention curricula for a program designed to provide natural and cultural resource access	The YCA program is funded by the Youth, Education, Prevention, Early Intervention, and Treatment Account (YEPEITA), which receives its revenue from the Adult Use of Cannabis tax. The objective of YEPEITA funding is to fund youth programs that implement substance use prevention practices and CNRA is legally required to incorporate these efforts into the program. Including Substance Use Prevention and Early Intervention Practices into a proposal is prioritized via the scoring rubric, but it is not required. Applicants who do not have the ability or desire to incorporate this funding priority are still eligible to apply.

Grant Administration	Payment Request Procedures - Request to allow documentation in Google Sheets	CNRA continues to evaluate and identify areas of improvement in our Payment Request procedures and is currently reviewing how to correct the Excel-Google Sheet crossover issues. Please reach out directly to your Grant Administrator for support.
	Insurance Requirements - Concern about smaller organizations' ability to meet insurance requirements	We recognize that smaller organizations may have limited fiscal capacity to procure required liability coverage as outlined in the guidelines, however due to State regulations and the nature of the YCA program, in which organizations are directly working with youth, CNRA cannot remove these requirements. The cost of insurance procurement is an eligible expense and can be included in the Cost Estimate for any organization that does not currently meet the requirements. Additionally, a Fiscal Sponsor may be used instead.
	Project Reporting Requirements - Request to allow qualitative data, such as participant testimonials, photos	If an applicant is selected for an award, subsequent quarterly reporting will require quantitative data, such as # of activities, # of youth served, etc., as well as request qualitative data such as participant testimonials, public communications, photos, and impact statements.
Program Objectives/Funding Priorities	Request to include additional language related to the objectives and priorities for the program, including: - culturally responsive programming - intergenerational learning - multilingual access - youth-led cultural activities - healthy choices - cultural identity - belonging and agency - prioritizing youth co-design & governance	The purpose of YCA funding is to provide youth access to natural and cultural resources, with a focus on low-income and disadvantaged youth. It is not possible to explicitly require, prioritize, or highlight additional programming or resources that are outside the purview of the program. However, CNRA encourages designing proposals that provide co-benefits and immersive experiences that provide youth with multiple opportunities to learn, grow, and develop.
Tribal Outreach	Tribal Outreach - Request to clarify tribal outreach contacts; request to clarify who this applies to; request to clarify what "outreach" is defined as; Request for clarification regarding the timing of tribal outreach between concept and full proposal submission.	Tribal outreach is required for any proposal that may affect a tribal community, whether that is a non-tribal applicant or a tribal applicant whose proposal may impact another California Native American Tribe. The final guidelines have been updated to: - Clarify that tribal outreach must be conducted with official tribal representatives. Outreach to individual tribal members or persons working for and/or with a tribe is not sufficient. - Clarify that "notification" is not sufficient, applicant must do due diligence. - Clarify that the required tribal outreach should occur if/when an applicant is invited to submit a Full Proposal. Tribal outreach prior to the Concept Proposal is encouraged but not required and is not a question in the Concept Proposal Form.