

MEAT AND POULTRY PROCESSING EXPANSION PROGRAM

PROJECT NARRATIVE TEMPLATE

Thoroughly review the Meat and Poultry Processing Expansion Program (MPPEP) Request for Applications (RFA) before completing this document. The use of this template is optional; however, you must address all content within the RFA to ensure a complete application is filed. Documents must be submitted as a PDF and attached to the application package in Grants.gov (www.grants.gov).

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SECTION ONE: APPLICANT INFORMATION

MARKET SHARE

Please specify the species to be processed, the percent of market share held by the applicant entity, and whether or not the applicant entity is within the top four processors for the species.

Species	Percent of Market Share	Is the Applicant entity within the top four processors for the species (Yes/No)
Beef		
Pork		
Chicken		
Turkey		

IDENTIFYING INFORMATION

Must match box 8 of the SF-424 (available at <https://www.grants.gov/forms/sf-424-family.html>).

Applicant Organization Name:	
Phone Number:	
Email:	
Facility Address:	
Mailing Address:	
Establishment's Number as applicable:	

FSIS Number:	
Business Permit:	
License Number:	
State Identifier:	

AUTHORIZED ORGANIZATION REPRESENTATIVE (AOR)

List the person who will be the main contact for any correspondence and who is responsible for signing any documentation in the event a grant is awarded. This information must match box 21 of the SF-424 (available at <https://www.grants.gov/forms/sf-424-family.html>).

Name:	
Title:	
Phone Number:	
Email:	
Mailing Address:	

PROJECT TITLE

Provide a descriptive project title in 15 words or less in the space below. Must match box 15 of the SF-424 (available at <https://www.grants.gov/forms/sf-424-family.html>).

Enter project title

FUNDING REQUEST

Insert the total amount (in U.S. dollars) of federal funds requested. This must match the total amount requested on Line 18a. Estimated Federal Funding of the SF-424 (available at <https://www.grants.gov/forms/sf-424-family.html>).

Total MPPEP Funds Requested (up to \$25,000,000.00 or 20 percent of the project cost, whichever is less): Enter total MPPEP funds requested amount \$

Total Other Funds: Enter total other funds amount \$

Total Project Cost: Enter total project cost \$

PERIOD OF PERFORMANCE

Maximum project performance period is 48 months.

Start Date:

End Date

EXECUTIVE SUMMARY

Include a project summary of 500 words or fewer detailing project goals and objectives.

SECTION TWO: PROJECT INFORMATION

MANAGEMENT PLAN

Describe your management plan — including listing applicant personnel and external project partners — who will be leading, coordinating, and carrying out activities under this project.

WORK PLAN

Develop a task timeline using the headings below. List and describe each individual task to be performed including the timeframe for implementation; required resources; milestone(s) for assessing progress and success; and who is responsible for completing the activity, including collaborative arrangements or subcontractors. The task descriptions must be sufficiently detailed to give a clear understanding of the general flow of work necessary to complete the project.

No.	Task Description	Anticipated Start Date	Anticipated Completion Date	Resources Required to Complete Task	Milestone(s) for Assessing Progress and Success	Identify Who Will Complete the Task
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						

BUDGET

Describe by expense category the amount of federal funds requested and other funds.

Expense Category	MPPEP Funds Requested	Other Funds	Total Funds
Personnel			
Fringe Benefits			
Equipment			
Construction			
Supplies			
Contractual			
Other			
Total Budget			

PERSONNEL

List the organization's employees whose time and effort can be specifically identified and easily and accurately traced to project activities.

No.	Name/Title	Level of Effort	
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
	Personnel Subtotal		

PERSONNEL JUSTIFICATION

For each individual listed in the above table, describe the activities to be completed by them, including when activities are expected to occur. If necessary, add more personnel by copying and pasting the existing listing.

FRINGE BENEFITS

Provide the fringe benefit rates for each of the project's salaried employees described in the Personnel section that will be paid with MPPEP funds.

No.	Name/Title	Fringe Benefit Rate	Funds Requested
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
Fringe Benefits Subtotals			

EQUIPMENT

Describe any necessary equipment directly related to the activities of the project to be purchased under the grant. Equipment means tangible personal property having a useful life of more than one year and a per unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-federal entity for financial statement purposes, or \$5,000.

No.	Item Description	Rental or Purchase	Acquire When?	Funds Requested
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
	Equipment Subtotal (Funds Requested)			

EQUIPMENT JUSTIFICATION

For each piece of equipment listed in the table above, describe the need and how this equipment will be used to achieve the objectives and outcomes of the project. If necessary, add more equipment by copying and pasting the existing listing.

CONSTRUCTION

Describe costs including administrative and legal expenses, structures, relocation expenses and payments, architectural and engineering fees, project inspection fees, site work, demolition and removal, construction, and miscellaneous expenses related to modernizing or expanding an existing facility.

No.	Description	Justification	Acquire When?	Funds Requested
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
	Construction Subtotal			

CONSTRUCTION JUSTIFICATION

Describe the need for construction costs. For projects involving construction, include any design and construction documents. If you are selected for funding, the agency will follow the construction planning and performing development regulation at 7 CFR 4280.125 (available at the following link <https://go.usa.gov/xzcMn>).

SUPPLIES

List the materials, supplies, and fabricated parts costing less than \$5,000 per unit and describe how they will support the purpose and goal of the proposal.

No.			# of		
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
Supplies Subtotal					

SUPPLIES JUSTIFICATION

Describe the purpose of each supply listed in the table above purchased and how it is necessary for the completion of the project's objectives and outcomes. If necessary, add more supplies by copying and pasting the existing listing.

CONTRACTUAL AND CONSULTANT COSTS

Contractual and consultant costs are the expenses associated with purchasing goods or procuring services performed by an individual or organization other than the applicant in the form of a procurement relationship. If there is more than one contractor or consultant, each must be described separately. (Repeat this section for each contract or consultant.)

ITEMIZED LIST OF CONTRACTORS AND CONSULTANTS

Provide a list of contractors or consultants, detailing out the name, hourly or flat rate, and overall cost of the services performed.

No.	Name/Organization	Hourly Rate/Flat Rate	Funds Requested
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
Contractual and Consultant Subtotal			

CONTRACTUAL JUSTIFICATION

Provide for each of the real or anticipated contractors listed above a description of the project activities they will accomplish to meet the objectives and outcomes of the project. Each section must also include a justification for why contractual or consultant services are to be used to meet the anticipated outcomes and objectives. Include timelines for each activity.

OTHER EXPENSES

Include any expenses not covered in any of the previous budget categories. Be sure to break down costs into cost or unit. Expenses in this section include meetings and conferences, communications, advertisements, publication costs, and data collection.

Item Description	Per-Unit			
Other Subtotal				

OTHER JUSTIFICATION

Describe the purpose of each item listed in the table above, and how it is necessary for the completion of the project's objectives and outcomes.

CONFORMING WITH YOUR PROCUREMENT STANDARDS

☐ By checking the box to the left, I confirm that my organization followed the same policies and procedures used for procurements from non-federal sources, which reflect applicable state and local laws and regulations and conform to the federal laws and standards identified in 2 CFR Part 200.317 through.326 (available at this link: <https://go.usa.gov/xzceC>), as applicable. If the contractors or consultants are not already selected, my organization will follow the same requirements.

SAFETY CONDITIONS

Describe factors relevant for the safety of staff, customers, and other stakeholders. Consider worker safety plan, food safety plan, and inspection requirements and status.

SECTION THREE: LAND OWNERSHIP AND ACCESS

LAND OWNERSHIP

Describe how you own and control or have access to the land where the project is located.

RESOLUTION OF SUPPORT FOR PROJECTS ON TRIBAL LAND

A resolution of support is required for projects on Tribal land. If the applicant is not the Tribe or an entity owned or operated by the Tribe, the resolution must come from the governing body of the Tribe with jurisdiction over the land.

SECTION FOUR: PERFORMANCE METRICS

PROPOSED METRICS

State what metrics you plan to achieve for increasing capacity. Please make sure that you establish baseline numbers or estimate realistic target numbers for the metrics you propose, since you will report on these metrics after project completion.

EXAMPLES:

Increased slaughter or processing capacity by a certain number of dollars, varieties of meat or poultry processed, volume (in pounds), percentage change, or a combination of volume and average price as a result of efficiency and capacity improvements

Metric

How did you derive the estimated numbers? (For instance, documented background or baseline information, and so on.)

Metric

How did you derive the estimated numbers? (For instance, documented background or baseline information, and so on.)

METRIC REPORTING

State how you intend to report on your proposed metrics after project completion.

Metric

How and when do you intend to evaluate? (For instance, surveys, third-party assessments, and so on.)

Anticipated key factors predicted to contribute to – and restrict – outcome (Include action steps for addressing identified restricting factors):

Metric

How and when do you intend to evaluate? (For instance, surveys, third-party assessments, and so on.)

Anticipated key factors predicted to contribute to – and restrict – outcome (Include action steps for addressing identified restricting factors):

SECTION FIVE: PROPOSAL EVALUATION CRITERIA

FINANCIAL VIABILITY, TECHNICAL FEASIBILITY AND READINESS (40 POINTS)

Clearly articulate your proposed project and how it will achieve financial viability, technical feasibility, and readiness by completing the sections below. Applicants can describe their project workplan, budget, and other documentation that supports the feasibility study associated with their proposed project. Also include market analysis describing relevant market concerns, value added to products produced in the facility, and the cost and availability of inputs to be used. Higher points will be awarded to applicants including related documentation. To achieve the highest possible points in this category, applicants must thoroughly address and support with documentation every section below.

A. INCOME AND EXPENSE PROJECTIONS

Please include your project projections for income and expense for at least three years after the project's completion.

B. ANTICIPATED DEBT SERVICE RATIO AS A PERCENTAGE OF GROSS ANTICIPATED INCOME

Please include and provide an explanation of the debt service ratio as a percentage of gross anticipated income.

C. DATA TO DEMONSTRATE PRODUCT DEMAND AND RELIABILITY OF SUPPLY FOR FINANCIAL FEASIBILITY

Please include a summary on product demand and reliability of supply as noted in the feasibility study. Also include a discussion of competing facilities.

D. DATA TO INFORM APPLICANT’S ABILITY TO ACHIEVE OPERATIONAL SUSTAINABILITY

Please include a narrative on how the project will achieve operational sustainability.

E. IDENTIFICATION OF MAJOR RISKS

Examples of major risks include product recall, labor risks, access to operating capital risk, and other legal risks. Please detail appropriate risk mitigation strategies.

F. PROPOSED PROJECTS IN STATE OR TRIBAL JURISDICTIONS

Please describe any actions that have been – or will need to be – completed in order to execute the proposed project within a state or Tribal jurisdiction.

G. STRATEGIES FOR MANAGING WATER QUALITY, OFFAL, AND SOLID WASTE

Please include whether the applicant has the appropriate zoning permits and whether water supply and other utility connections are in place or underway.

H. PROJECT MATURITY

Please note any milestones that have already been completed, such as acquisition of real estate, applicable permits, or outreach to local, state, Tribal, and federal partners.

I. CONFIRMED OR PRELIMINARY FINANCING

Include in this section confirmed and preliminary financing committed to the project:

1. Indicate whether the applicant has commitments for securing cash flow and operating capital to pay workers and ensure ongoing, non-employee-related operating capital access
2. How the funding requested in this application will contribute to – or complete – the project capital stack

J. APPLICANT'S RELATIONSHIPS WITH FOOD SCIENCE AND MEAT SCIENCE PROFESSIONALS

Please note whether the applicant has existing relationships with food and meat science professionals. Also indicate whether the applicant has already contacted its relevant inspection agency – for example, USDA's Food Safety and Inspection Service (FSIS – available at this link: <https://fsis.usda.gov>) or state meat and poultry inspection program.

K. HAZARD ANALYSIS AND CRITICAL CONTROL POINTS

Please include a summary of the Hazard Analysis and Critical Control Points (HACCP) plan (available at this link: <https://www.fsis.usda.gov>) for discussion of HACCP plan development status.

L. GENERAL ECONOMIC CONDITIONS RELEVANT TO PROJECT

Please describe any general economic considerations with respect to the proposed project and its implementation.

M. ADJOINING FEEDLOT

Please add additional information on whether or not you are planning an adjoining feedlot.

N. FURTHER EXPANSTION

Please detail whether you have plans for further expansion.

O. ADDITIONAL FINANCIAL VIABILITY INFORMATION

Please include any additional supporting information related to the project's financial viability.

MARKET IMPACT AND OPPORTUNITIES (20 POINTS)

Applicants must describe commitments from producers, end users, and potential buyers. Additionally, proposals will be scored based on the degree that they demonstrate their project will drive economic activity in the area and incorporate project design that utilizes ownership models that support worker, producer, or consumer needs. Higher points will be awarded to applications that document support price transparency, producer profitability, and value-added production as well as commitments from producers, or consumers, end users, and potential buyers. Applicants must address the following criteria:

ANIMAL OR INPUT PROCUREMENT

Applicants must describe how they are planning to procure animals and provide more opportunities for producers relative to the existing processing opportunities in their area from which they are procuring animals as well as to relevant improvements in market access. Please outline your plan or mechanisms for animal or input procurement, including the frequency of procurement.

1. **Facilities that purchase livestock or poultry:** please include additional information about estimated purchase types and volumes (cash, formula, forward contract, negotiated grid, and so on).
2. **Facilities that own livestock or poultry:** please include a general description of any production contract terms for the livestock or poultry.
3. **Facilities that provide fee-for-service processing:** please outline in your narrative the services provided, along with estimated prices and anticipated volumes
4. **Facilities that only provide further processing without slaughter:** please include a plan for sourcing inputs from independently-owned processors, and note the percentage of inputs that will be sourced from such processors.

INVOLVED PRODUCERS

Discuss the current or anticipated number of producers involved in the project, as appropriate.

No.	Producer	Actual or Anticipated involvement
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		

OPERATIONAL CAPACITY COMMITMENTS AND TIMELINE

Discuss potential for confirmed commitments relative to initial opening operational capacity (expressed as a percentage) and the projected timeline for reaching full maximum operating capacity.

END-USER COMMITMENTS

Discuss current or prospective end-user commitments, including potential or identified markets (domestic or international), and the potential amount of output to be sold.

SOURCING COMMITMENTS

To the extent applicable, discuss current or prospective commitments for the sourcing of inputs for further processing from independent processors and if known, the volume of potential commitments relative to operational capacity (expressed as a percentage).

REGIONAL IMPACT

Please note the anticipated geographic region from which the applicant will source input and market products or services.

CONTINGENCY PLANS

Please describe any contingency plans for loss of inputs or markets.

PROFIT-SHARING

Please note whether the operation is a cooperative business model or otherwise shares profits or ownership with consumers, producers, or workers.

MARKET CONCERNS

Describe any other market concerns to be addressed or opportunities achieved should the project be selected for funding.

MARKET SHARE

Please indicate whether or not the applicant is among the top four processors in the nation in beef, pork, chicken, or turkey.

COMMUNITY IMPACT AND SUPPORT (15 POINTS)

In order to receive any points for this section, applicants must also provide a letter of support from state, local, or Tribal leadership where the proposed startup or expansion activities will take place.

As a reminder, a resolution of support from the governing body of the Tribe with jurisdiction of the land where the proposed project is to take place is required for projects on Tribal lands, from the governing body of the Tribe with jurisdiction over that land, if the applicant is not the Tribe or an entity owned or operated by that Tribe. Please see the “Land Ownership and Access” Section on page 14 of this template for additional information.

LETTER OF SUPPORT

The applicant must submit at least one letter of support from state, local, or Tribal leadership, or zero points will be awarded under this criterion. Examples of qualifying leaders include state and local government officials and Tribal government officials.

Additional letters of support from relevant local and regional stakeholders are welcome. Examples include economic development organizations, associations of agricultural producers, labor unions, institutions of higher education, and state, local, and Tribal governments.

1. Identify the stakeholder producing the letter and their connection to the project activities,
2. Describe the sustained community impact that will be supported by the proposed startup or expansion activities to be carried out under the grant
3. Provide additional information relative to the project’s impact on the community’s long-term needs and goals.

COMMUNITY IMPACT

Applicants must describe the community impact and support of their proposed project as well as explain any strategies – planned or in process – to get and maintain community support. Discussion can include direct or indirect commitments of support from producers (and other processors serving as suppliers for projects that involve further processing), end users, potential buyers, community leaders, and other stakeholders. Other information to include: details of direct or indirect commitments (financial or otherwise) provided by other federal, Tribal, state, or local governments, along with any commitments or contributions from other third parties.

LABOR/WORKFORCE/PERSONNEL (25 POINTS)

The Biden-Harris administration is committed to principles that support worker empowerment and commitments to well-paying jobs, the free and fair choice to join a union, greater job security, safe and healthy workplaces, essential benefits like health insurance and retirement plans, and protections from workplace harassment and other forms of discrimination for workers across the country. Applicants must describe key personnel involved with the facility, construction personnel engaged with the facility, and operations personnel to be hired or currently employed by the project applicant.

KEY PERSONNEL (UP TO 5 POINTS)

Applications will be scored on the basis of how key personnel will contribute to the likelihood of project success. Include information about your leadership's qualifications, training, and experience. Experience of key personnel will be assessed in relation to the scale of the plant and the type of the operation. Higher points will be awarded to applicants that thoroughly describe in narrative and provide resumes and other documentation to support the following criteria:

1. Roles and relevant qualifications of owners, staff, contractors, consultants, or new hires performing tasks included in the workplan
2. Project leaders – identified by name – who will be responsible for managing and completing the proposed tasks in the work plan
3. Commitment, qualifications, role, and availability of any consultants or other professionals who will be hired for the project.

CONSTRUCTION LABOR (IF APPLICABLE, UP TO 10 POINTS)

Applicants will be scored based on the construction labor standards upheld by contractors and subcontractors. Higher points will be awarded to applicants that thoroughly describe in narrative and, if available, provide documentation to support the criteria below. Please note that projects not involving construction will not be penalized for not addressing this section.

1. Whether – and if so, how – the construction project will incorporate labor standards referenced herein, including whether workers (including employees of contractors and subcontractors) will be paid wages at or above the prevailing rate.
2. Whether the project construction firm will be under a project labor agreement, either with the construction company or the applicant.
3. What safety training, professional certifications, in-house training or licensure will be provided and required of construction workers (including contractors and subcontractors).
4. Whether a locally-based construction workforce will be used.
5. For projects that propose to build on Tribal lands, whether the applicant, its contractors, or subcontractors will follow Tribal laws (for example, Tribal employment rights ordinances).

OPERATIONAL WORKFORCE (UP TO 10 POINTS)

Applicants will be scored on the basis of the labor standards the applicant plans to maintain as well as wages, benefits, and other opportunities offered to workers. Applicants will also be scored on their strategy for workforce recruitment, training, and retention. Higher points will be awarded to applicants whose narrative addresses how the strategy contributes to the overall viability of the project. Higher points will be awarded to applicants with a staffing plan that includes analysis of the local job market and that thoroughly address and – if available – provide documentation to support the following criteria:

1. Plans for compensation, benefits, and employee ownership opportunities that will be offered to workers.
2. Whether the project operates – or will operate – under a collective bargaining agreement.
3. Whether the project operates – or will operate – under a worker safety agreement.
4. Strategy for workforce recruitment, training, and retention.
5. Availability of professional certification, credentials, and other training or opportunities for career advancement.
6. What safety training, professional certifications, in-house training or licensure will be provided to – or required of – workers (including contractors and subcontractors)

DISCRETIONARY POINTS (15 POINTS)

During review by Rural Development, discretionary points can be assigned by the Rural Business-Cooperative Service Administrator for projects that maximize diversity among awards on the basis of geography (including those located in underserved communities), operation size, species, ownership, and business model.

SECTION IV: AFFIRMATION AND CERTIFICATION

I affirm and certify the following:

- a. The applicant certifies that it engages or proposes to engage in meat and poultry processing that will expand capacity in the sector.
- b. The applicant certifies that if engaged – or proposing to engage – in further processing, the project increases demand for animals; increases opportunities for producers to access value-added markets; or improves the viability of an existing processing operation and that inputs are the products of primary processing.
- c. If a private entity, the applicant certifies it is independently owned and operated.
- d. The applicant certifies that it is domestically-owned and the facility is physically located and operated within the U.S. or its territories.
- e. The applicant identified whether or not there is a known relationship or association with a Rural Development employee. If there is a known relationship, the applicant identified each Rural Development employee with whom there is a known relationship.
- f. The applicant is a legal entity in good standing and operating in accordance with the laws of the state(s) or Tribe(s) where the applicant has a place of business.
- g. The applicant has not been found – and will not be found – to be unfit to obtain a grant of federal, state, or Tribal equivalent inspection because of convictions in a federal or state court. Nor has the applicant been convicted of a felony or multiple misdemeanors involving the acquisition, handling, or distribution of adulterated or misbranded meat or poultry products or fraud in connection with transactions in food.
- h. The applicant is not the subject of a pending administrative, civil, or criminal enforcement action.
- i. The applicant is – or plans to be – operating under a current grant of federal or equivalent state or Tribal inspection. In addition, if inspection services have been suspended in the past five years, the applicant must disclose the reasons for the suspension and indicate how the action was resolved.
- j. The applicant certifies that any equipment required for the project is available or can be procured and delivered within the proposed project development schedule, and will be installed in conformance with manufacturer's specifications and design requirements.
- k. The project will be constructed in accordance with applicable laws, regulations, agreements, permits, codes, and standards.
- l. The applicant is not one of the top four processors in the nation of beef, pork, chicken, or turkey processing.
- m. The applicant has secured other funding needed to complete the project as proposed in the application.
- n. The applicant acknowledges that:
 1. Rural Development will check the Do Not Pay System to verify the applicant entity:
 - Has an active entity registration in the System for Award Management (SAM, available at this link: <https://www.sam.gov>)
 - Has not been debarred or suspended
 - Is not listed on the Credit Alert Verification Reporting System
 - Is not listed on the Treasury Offset Program;
 - Does not appear on the Social Security Death Records list
 2. The applicant is responsible for resolving any issues reported in the Do Not Pay System. If issues are not resolved by the time Rural Development makes program awards, funds will be awarded to other eligible applicants.
- o. My organization has reviewed and understands the regulatory requirements for obtaining a Federal Grant of Inspection under the Federal Meat Inspection Act (FMIA) or the

Poultry Products Inspection Act (PPIA); for obtaining a grant to operate as a state-inspected facility compliant with the FMIA or PPIA under the Cooperative Interstate Shipment (CIS) program (available at this link: <https://go.usa.gov/xzcSF>), or for participating in a Tribal or state meat and poultry inspection program with standards at least equal to federal inspection at the time of application.

- p. I understand I will need to return federal funds awarded if my organization does not obtain a Federal Grants of Inspection or does not become eligible for inspection under the Cooperative interstate shipping program (as described in Section 2.4 of the RFA and available at this link: <https://www.rd.usda.gov>).
- q. I certify the applicant or owner(s) are not presently suspended, debarred, proposed for debarment, declared ineligible, voluntarily excluded from participation in this transaction by any federal or state department or agency. Nor are the applicant or owner(s) presently involved in any bankruptcy proceedings.
- r. I understand that USDA-RBCS will rely on the accuracy of the submittals and certifications made with this application. Any misrepresentation or inaccurate information may result in a determination of ineligibility and forfeiture of grant funds. I further understand I may be required to submit backup documentation proving the accuracy of my answers.
- s. I understand that signing this document does not constitute an approved grant by USDA-RBCS.

☐ I, the undersigned, declare that I have reviewed the application and accompanying documentation, and to the best of my knowledge and information, it is true, correct, and complete. I hereby agree with all program requirements as specified above.

Anyone who makes false, fictitious, or fraudulent statements or entries is subject to a \$10,000 fine, imprisonment for not more than 5 years, or both, as prescribed by 18 U.S.C 1001 (available at this link: <https://go.usa.gov/xzch2>).

Signature:

Date:

Use the MPPEP Application Checklist (available at this link: <https://www.rd.usda.gov>) to ensure all documents of a complete application are filed.

EQUAL OPPORTUNITY STATEMENT

USDA is an equal opportunity provider, employer, and lender.