

AAPSE Position Statement on Federal Funding Changes

August 30, 2006

EPA's goal is to improve its environmental health and safety outcomes from its certification efforts. EPA seeks to meet this goal by ensuring credible, high-quality pesticide programs that meet or exceed federal minimum standards in a fiscally efficient manner with appropriate accountability. AAPSE fully shares this view and is eager to work with EPA and its partner states to make the view a reality.

We understand how soliciting a few grants with identifiable outputs from a broader pool of applicants would appeal to EPA staff in a time of shrinking budgets. The question is whether such an approach will help EPA realize the previously stated goal and satisfy GPRA requirements. Based on our members' cumulative experience and involvement with this program over the past 30 years, we believe that the proposed change in EPA's funding model actually will be counterproductive and will have unintended negative consequences for both EPA and its partner states. We outline AAPSE's reasoning below.

1) Reduced Funding Efficiency

a) Loss of Matching Funds. Offering regional or national competitive grants is less efficient than the traditional funding model stipulated in FIFRA because such grants preclude the maximum usage of dollars for the actual work of certification and training of applicators. First, the substantial overhead associated with the grants reduces the actual amount of money available for the assigned work. Second, and more importantly, the traditional funding mechanism leveraged additional funds by requiring a 50-50 match. In essence, if EPA offers 1 million in competitive grants it will lose at a minimum an additional 1 M from Federal Smith-Lever /State Extension funds for certification efforts. Normally this in-kind match by land-grant universities was substantially higher than 50%.

b) Loss of Extension's Reach and Supplemental Efforts. By including the private sector within the pool of grant applicants, the proposed funding model also disregards Extension's unparalleled history and willingness to deliver the most service per federal dollar. For maximum efficiency, FIFRA directed EPA to use the extensive system of the Land Grant Universities and Extension System and to support that effort with 50% funding. Extension is the only organization with the capacity to reach growers, applicators, and workers in every corner of the country. In addition, Extension is unique in its history of including unfunded federal initiatives (e.g., Worker Protection Standard) in its pesticide safety education programming. To maximize the return on public dollars, it was and still is fiscally responsible for EPA to employ Extension's vast infrastructure and willingness to take on additional, unfunded initiatives.

2) Adverse Impacts on State Lead Agencies

Regional and national competitive grants fail to support the base program that every state lead agency must implement. This will increase the state certification burden even in those states to which EPA awards the grants.

Many state plans designate the land grant university as the training arm. If they withdraw, EPA state plans will be out of compliance.

3) Adverse effects on safe pesticide use

EPA's decision to forego base funding for each state's pesticide safety education program undermines the most critical and effective method for teaching adult learners safe and legal pesticide use. For the majority of prospective pesticide applicators, on-site prelicense training is far superior to self-learning through paper or on-line study materials. While many states may not have the ability to actively compete for grants, they have shown their programs to be very capable of conducting comprehensive initial certification training. On-site training is particularly important for applicators who struggle with new terminology, mathematical equations and complex concepts. The elimination of base funding will result in some states discontinuing on-site initial certification training and this will undoubtedly result in less competent and confident applicators.

4) Erosion of the Public Trust

EPA's own research on risk perception shows that the American public puts more trust in universities and Extension personnel than in any other source of information on controversial topics such as pesticide use. If EPA broadens the pool of candidates for receiving federal funds to develop pesticide safety education materials, it risks eroding the public's trust in the Agency's sincere desire to protect Americans from pesticide misuse. Turning away from FIFRA's intent and wisdom to entrust education to Extension directly contradicts EPA's vision of ensuring that pesticide programs are credible.

5) Limitations of Regional Projects

In general, state and even regional projects to develop pesticide safety education manuals have had limited success with respect to broad adoption unless the target category was a very specific, limited use (e.g., sewer root control) or had a very broad appeal (e.g., general core). Overwhelmingly, the high-use category areas and even core have been justifiably tailored to meet the concerns and conditions in states that vary widely in target sites, pests, climate, environmental concerns, and state legislative mandates.

6) Reduced, Rather than Increased, Interstate Cooperation

While the intent of open, regional, or national grants may be to encourage collaboration, it will likely promote self-interest and provide disincentives for the free flow of resources that have been the hallmark of Extension outreach programming. Unless they are large, grants will be unattractive to groups of cooperators. For example, a grant of \$75,000 minus 40% overhead divided among 4 cooperating states will provide insufficient funds to the individual cooperators to support their efforts. Other states who are left unfunded and are forced to reduce programming will be unwilling (and even unable) to share the resources necessary to make the project broadly applicable or to donate their review time. Many states may simply forego participating at all.

Summary

In summary, while we recognize the pressure on EPA to be more effective and efficient, AAPSE believes that abandoning the funding of state extension certification programs will prevent EPA from accomplishing its goals. In addition, it will have a detrimental effect on state lead agencies, state extension outreach, the support of the American public, and ultimately on EPA.