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Mr. Steve L. Johnson, Assistant Administrator
Office of Prevention, Pesticides, and Toxic Substances
(7101M)
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460

Dear Steve:

The American Association of Pesticide Safety Educators (AAPSE) has been cooperating with EPA and USDA in trying to resolve the funding situation for Pesticide Safety Education Programs (PSEPs) in FY 2003 and beyond. In a June 11, 2003 meeting of budget and program officers from EPA and USDA, as well as myself representing AAPSE, EPA stated the agency would reassess the elimination of FY 2003 funding in July; this allowed USDA and states to bill and collect for their previous and current expenditures. AAPSE is fully aware the past billing situation created the appearance of an excess of funds within USDA.

The current status, as AAPSE understands it, is as follows. According to the July 1 balance sheets provided to AAPSE by USDA, it is very clear that only about 21% (\$394,463) of the 2002 amount obligated remains unspent by the states. The remaining balance will support state programs only through the end of September 2003. All of the previous years' funds have been spent -- and billed for -- by the states, with a few exceptions. The outstanding balances from those years are as follows.

1998	\$15,499	(<1%)
1999	\$30,767	(2%)
2000	\$32,553	(2%)
2001	\$64,344	(4%)

In summary, with the exception of a very small number of states, territories, or commonwealths, the state PSEP Coordinators and their institutions have expended and billed for their FY 1998 - 2002 allocation (total unspent balance is \$537,795). However, EPA balance sheets still reflect higher balances due to the billing schedule limitations set within USDA fiscal policy. To show good faith to EPA that the remaining funds will be spent by September 30, 2003, AAPSE has received verbal and written assurances from the state PSEP Coordinators (both AAPSE members and non-members) and their budget officers that essentially no money from the EPA FY 2002 pass-through funds will remain at the end of this fiscal year.

AAPSE now calls upon EPA to release the FY 2003 funds to the state PSEPs, and to immediately contact the state, territorial, and commonwealth CES Directors to inform them of restoration of the funding.

Extension Directors are in the process of making their own tough budget decisions, and we need to ensure this matter is cleared up before any further damage to state PSEPs occurs. Without the knowledge that these funds have been restored and that future funding will follow, many state programs are at serious risk and detrimental impacts will occur. It is critical that action take place immediately, as more than one month has passed since EPA apprized USDA about the elimination of FY 2003 funds.

Clearly, the funding process and accountability must be improved to ensure this situation does not recur in the future. As stated during the June 11 meeting, Kevin Keaney has indicated interest in setting up a task force to address the issues for FY 2004 and beyond, including developing a new mechanism of funding as well as creating funding stability. We urge EPA to appoint the task force, provide it with a charge, and establish a reasonable time frame within which to accomplish its work, which will result in a comprehensive and workable solution.

In the immediate future, AAPSE will continue to work with Mr. Keaney to evaluate alternate funding mechanisms for discussion at the 2003 National Pesticide Applicator Certification and Training Workshop, scheduled in August 2003. However, we caution that adequate time must be allowed to evaluate multiple options, develop protocol, hold discussions with stakeholders, and, finally, implement the changes.

AAPSE reminds EPA that the arrangement to pass funds through USDA incurs no institutional overhead (indirect costs), which results in a real bargain for both state programs and EPA. If the USDA pass-through mechanism is eliminated, states will most likely face between 20% to 49% indirect costs charged for external grants. In such a case, failing an increase in the total PSEP allocation from EPA, state programs would likely be reduced by that amount. Preliminary feedback indicates that such a drastic cut would jeopardize the entire program in some states.

AAPSE is committed to continuing to work with EPA and USDA, as well as directly with the state CESSs, to improve and strengthen the funding and the process. We appreciate your consideration and efforts.

Sincerely,

Amy E. Brown, Ph.D.
President, AAPSE

cc: Jay Ellenberger, EPA
Jim Jones, EPA
Kevin Keaney, EPA
Marty Monell, EPA
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