"Below are the written comments received in response to a November 19, 1999 Federal Register notice of CSREES intention to implement Section 406 of the Agricultural Research, Extension, and Education Reform Act of 1998. The act (AREERA) (7 U.S.C. 7626) authorized the Secretary of Agriculture to establish a research, education, and extension competitive grant program to provide funding for integrated, multifunctional agricultural research, extension, and education activities (Integrated Authority).

A public meeting was held December 2, 1999 which solicited input from persons who use or conduct research, education, or extension regarding the priorities to be addressed by this new program. Transcripts of this testimony are also available below."

COMMENTS

Name: David J. Sammons, Chair, International Agriculture Section, Board on Agriculture, National Association of State Universities and Land Grant Colleges (NASULGC) & Associate Dean of Agriculture - International Agriculture
Organization Representing: Purdue University**,** International Programs in Agriculture Office of the Associate Dean and Director, 1168 Agricultural Administration Building 26, West Lafayette, IN 47907-1168
Telephone: (765) 494-6876
Fax: (765) 494-9613

December 14, 1999

Dr. Charles Laughlin, Administrator
Cooperative State Research, Education, and Extension Service
U.S. Department of Agriculture
1400 Independence Ave., SW - Room 305-A
Washington, D.C. 20250

Dear Dr. Laughlin:

I write today in my capacity as Chair of the International Agriculture Section (IAS) of NASULGC to contribute to the public discussion concerning the new competitive grants program authorized in Section 406 of AREERA (7 U.S.C. 7626). The views outlined below represent those of the IAS membership across the nation. As you know, Section 406 authorizes the Secretary of Agriculture to establish a extension competitive grants program to provide funding for integrated, multi-functional agricultural research, extension, and education activities. We in the university community, whose responsibilities are principally in the international dimension, fully support an integrative approach to the agricultural sciences, and are pleased by the opportunity that this legislation provides for directed programs of this sort. In fact, our on-campus work in the international programs arena by its very nature is integrative and cross cutting of the Land-Grant University mission areas. Thus, what is proposed in Section 406 is fully congruent with the way we approach our responsibilities on campus. Moreover, in an era of rapid globalization of all that we do in the agricultural sciences, this integrative approach is especially appropriate in our view.

We suggest that the new program parameters affirm the international dimensions of the priority areas that are identified in the Section 406 legislation. We further suggest that special efforts be made to solicit proposals that recognize the international dimension of these priority areas. Clearly, the critical national problems of water quality, food safety, and pest management/pesticides are all issues that cross the lines on maps. Each of these important priority areas are global in nature, and just as the problems they identify are global by their very nature so too are their solutions. We believe that it is impossible, in good faith to the intent of Congress, to ignore the international dimensions of each of these priority areas.

It is our hope that solicitation of proposals through public announcement of this program explicitly recognize the importance and appropriateness of inclusion of an international perspective in the proposal writing process. Understandably, the focus of the program will be on domestic issues as determined by the priority areas identified in the legislation but, in a global environment, we believe that it is not realistic nor responsible to exclude an international content in the activities that will be funded. Certainly, those in our community within the Land-Grant System stand ready to answer questions or offer suggestions about how an international dimension might proactively be built into this competitive grants process. Please feel free to call on me or any of our membership as this process goes forward.

Thank you, again, for your continuing interest in and support of our international programs. I appreciate this opportunity to offer comments on behalf of my colleagues in response to the solicitation of stakeholder input announced in the Federal Register.

Sincerely,

/s/
David J. Sammons, Chair
International Agriculture Section, Board on Agriculture
National Association of State Universities and Land Grant Colleges (NASULGC)
Associate Dean of Agriculture - International Agriculture

cc: I.M. Gonzalez, J. Coulter, H. Larew, S. Glucksman, M. Neuville, P. McGrath, T. Fretz

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Name: Monte P. Johnson, Ph.D. & B. C. Pass, Ph.D.
Organization Representing: University of Kentucky, College of Agriculture, Cooperative Extension Service **,** Entomology, S-225 Ag. Science Bldg.-North, Lexington, Kentucky 40506-0091
Telephone: (606) 257-5955
FAX: (606) 323-1120

December 8, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, STOP 2240
1400 Independence Avenue, SW
Washington, D.C. 20250-2240

Dear Ms. Joya:

Enclosed you will find three copies of "Comments on Section 406 Related to the Pesticide Impact Assessment Program (PIAP)." We are submitting these comments because of our concern over the transfer from 3(d) formula funding to Integrated Programs competitive funding.

Thank you for acknowledging our concern. We hope these comments, along with the input of several of our colleagues, will have some bearing on final funding decisions.

Sincerely,

/s/
Monte P. Johnson, Ph.D.
Extension Specialist

/s/
B. C. Pass, Ph.D.
PIAP SLR

Enclosures

c: D. D. Kopp
O. N. Nesheim

Comments on Section 406 Rated to the Pesticide Impact Assessment Program (PL\P)
Dr. Monte P. Johnson, PIAP
Dr. B. C. Pass, PIAP SLR
University of Kentucky
December 6, 1999

The Pesticide Impact Assessment Program's (PIAP) primary responsibility has been to provide the most objective and accurate information available for defining and evaluating benefits and risks of pesticides used primarily in agricultural situations. Over the program's 23 years of existence, much has been accomplished both here in Kentucky as well as nationally basically because of the program's stability. The program was stable because formula funding allowed personnel and programs to be supported for multiple years. The following bullets list the important advantages to the PIAP in Kentucky up to this point:

- The PIAP State Liaison Representative (SLR) provides a single point of contact in Kentucky;

- Basing the SLR at the University of Kentucky provides unequaled access to those research and extension faculty with the highest level of expertise and knowledge on various important commodities grown in the state;

- The PIAP has been very successful in providing data on pesticide use and usage to USDA and EPA in order to address such issues as the Food Quality Protection Act. An example of a recent project is the multi-year Crop Profiles program;

- Pesticide use data collection can be greatly enhanced by, sometimes over years, establishing effective working relationships with commodity groups and other stakeholders, research and extension faculty, organizations such as the Kentucky Division of Pesticides and the Kentucky Agricultural Statistics Service. Continuity of these positive working relationships and the trust that goes with them is very important;

- Communication with other state and regional PIAP personnel is facilitated by stable funding; and,

- and, Personnel supported by PIAP are involved with other important, related programs such as Pesticide Applicator Training and Integrated Pest Management. This offers a unique perspective that allows sharing of information from all three programs.

Since the PIAP has been placed under Section 406, we strongly recommend that the Request For Proposals be developed as rapidly as possible and that it will allow for multiple year funding. The RFP should reflect the historical responsibilities of the PIA Program and should disrupt the current framework as little as possible.

In summary, the Pesticide Impact Assessment Program has been successful in gathering and reporting important pesticide use data and has been very active in outreach activities.

Name: Barry M. Brennan, PhD
Organization Representing: Cooperative Extension Service, University of Hawaii at Manoa, College of Tropical Agriculture and Human Resources, United States Department of Agriculture Cooperating, Department of Environmental Biochemistry, 1800 East-West Road, Henke Hall 329, Honolulu, HI 96822
Telephone: (808) 956-9208
Fax: (808) 956-9675

26 November 1999

Terri Joya
Competitive Research Grants and
Awards Management
USDA/CRSEES Stop 2240
1400 Independence Avenue SW
Washington, DC 20250-2240

RE: Integrated Research, Education and Extension Competitive Grants Program Priorities

Dear Ms. Joya:

Several 3d programs (Water Quality, Food Safety, Pesticide Impact Assessment) included in the new IREE Competitive Grants Program have a significant extension component. The Pesticide Applicator Training Program (another 3d program) has supplemented the link between these programs and farmers for nearly 25 years. Over 400,000 farmers and commercial pesticide applicators attend or obtain annual training via classroom instruction, short-courses, professional meetings, correspondence courses, or the Internet. In most states training is part of a certification program administered by the state department of agriculture. The link between certification and training enhances the state extension service's efforts to keep farmers informed about pesticides, food safety, water quality, and regulatory changes. For example, the following topics related to water quality, food safety and pesticide impact assessment are covered as part of PAT certification or recertification training:

Water Quality - Surface and ground water pollution prevention via proper selection of pesticide formulations, application techniques (particularly incorporation, chemigation, fumigation), back-flow prevention, wellhead protection, spray drift management, and disposal of rinsate, tank mix and containers.

Food Safety - Compliance with label directions to prevent excess or illegal pesticide residues, pest management ethics, understanding of application and pre-harvest intervals, and impact of the environment and cropping practices on pesticide degradation.

Pesticide Impact Assessment - Pesticide registration and reregistration programs, pesticide regulation and recordkeeping requirements, and regulatory consequences of pesticide misuse.

Most PAT coordinators also serve as the State Liaison Representative for the Pesticide Impact Assessment Program and as such provide advice to state and federal regulatory agencies. Several regional PIAP coordinators have expressed their concern that inclusion of PIAP in IREE will seriously damage the ability of USDA and the Land Grants to effectively respond to EPA regulatory proposals. Including an extension component as part of the PIAP RFP will help maintain the infrastructure needed to allow USDA and the Land Grants to respond to EPA regulatory proposals. If the extension component focuses on pesticide regulation, education and risk mitigation it can be linked to PAT programs. The PAT program has a strong, viable infrastructure in all 55 states and territories and is capable of delivering information and training to very diverse audiences. By promoting stronger links between PIAP and PAT, PIAP will retain some modicum of long-term stability. It will also benefit by being able to share existing PAT resources.

The inclusion of selected 3d programs within IREE should not negate the importance of their extension objectives. RFPs should allow up to three years of funding to promote long-range planning, provide program continuity, and support CSREES strategic planning and GPRA objectives. IREE needs to be more than just a source of short-term research funding.

In summary, RFPs should give high priority to (1) building on existing programs, (2) requiring an extension or outreach component, and (3) providing long-term funding to meet long-term goals.

Thank you very much for the opportunity to respond to CSREES's request for comments.

Sincerely yours,

/S/
Barry M. Brennan, PhD
Extension Specialist and Pesticide Coordinator

Cc: Michael Harrington, Acting Dean
Charlotte Nakamura, Acting Extension Director

Name: Scott McKinnie
Organization Representing: FEQL, Food and Environmental Quality Laboratory Advisory Board, 710 University Drive, Richland, WA 99352-1671

December 7, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, Stop 2240
1400 Independence Ave. SW
Washington, D.C. 20250-2240

Dear Ms. Joya,

Thank you for the opportunity to provide written comment on the priorities to be addressed in the Request for Proposals (RFP) for the Pesticide Impact Assessment Program (PIAP) through Section 406 of AREERA.

In order to place my comments in context, I first need to introduce myself and the Board I represent. I am the chair of a 1 7-member Advisory Board for Washington State University's Food and Environmental Quality Laboratory (FEQL). Board members are drawn from a variety of sectors within Washington State, including representatives from: the environmental sector, food processors, marketers, farm labor, four different state agencies involved in agricultural regulations, federal regional pesticide laboratories, privately owned pesticide analytical laboratories, physicians, chemical and fertilizer industry representatives, farm organizations, and consumers. Personnel associated with the FEQL include an analytical chemist, an environmental toxicologist, the Washington State JR-4 state liaison (and also statewide IPM coordinator), the PIAP state liaison representative and their associated staff. The objectives of the FEQL mission statement mirror the activities undertaken there on a daily basis:

(1) Conduct pesticide residue studies to protect the environment and maintain safe food production through re-registration and new registrations of biological technologies and agrichemicals vital to continued production of a diversity of crops in Washington;

(2) Find environmentally sound solutions to pest control problems, assess alternative methods of pest control, and aid implementation of best management practices;

(3) Provide environmental education and information regarding pest control and food quality to university personnel, government agencies, producers, environmental organizations, business and industry, and consumers.

Each of these three objectives is critical to FQPA implementation in Washington State. The new CAR and RAMP funds would be appropriate research funds for the FEQL faculty to pursue, and we encourage them to do so. We are greatly concerned however about maintaining the extension component of the PIAP information network previously organized under the 3(d) mandate.

Maintaining basic information collection and dissemination services in Washington State is critical in order for us to keep our state clientele informed of the progress *and requirements* of FQPA implementation. The system currently in place at FEQL's Pesticide Information Center (PIC) works both "top down," disseminating information to affected stakeholders and other interested parties, and "bottom up," responding to a variety of information requests from USDA. Requests from other stakeholders are handled as well.

Under the leadership of the PIAP state liaison, PIC has collected, organized, and made available a wealth of interrelated information key to FQPA implementation in Washington State:

- In order to write a crop profile or a transition strategy, it is necessary to first know which pesticides are registered on a given crop. **A pesticide registration database is maintained at the PIC office.**

- In order to quickly respond to data requests such as proposed use cancellations from OPMP, lists of appropriate state contacts must be maintained. **A database of these names is available in the PIC office.**

- When information comes out at the state or federal level on actual use cancellations, a network must be in place to quickly inform our clientele of the news. Again, under the direction of the PIAP state liaison representative, **PIC maintains a database and a program of notification** for 171 different grower or producer groups, university extension personnel, and state agency personnel, targeted by discipline (entomology, plant pathology, etc.) and crop/site of interest; these primary contacts in turn disseminate information to a host of affected parties.

- The PIAP representative's office also puts out a newsletter. **The monthly *Agrichemical and Environmental News* has proven to be a very effective way to reach our clientele.** The strong and growing subscriber base for this newsletter, built over time, relies on *AENews* for analysis of current pesticide and related environmental issues.

Washington State produces over 250 crops including forestry products. The diversity of agriculture, and its importance to our state's economy can not be overstated. Our growers are progressive and interested in stewardship of our natural resources while at the same time producing safe and economical food for consumption both within the United States and in foreign countries. In order to do this, they depend on up-to-date information on pesticide regulations. They also expect USDA to collect pesticide usage information that accurately reflects on-farm practices, and provide that information to EPA, in the manner of the crop profiles. In short, growers, industry, and regulators throughout Washington State have come to rely on the comprehensive and effective data collation and distribution that FEQL's PIC provides. To lose these services now, square in the middle of FQPA implementation, would be a great disservice to agriculture. We urge you to consider these facts when writing the RFP; we ask that you include in the RFP such basic services as newsletters, databases, and travel for presentation to grower meetings.

I would be happy to answer any questions you may have. Please feel free to contact me. Again, I thank you for the opportunity to submit comment.

Sincerely,

Scott McKinnie
Chair, FEQL Advisory Board

Name: Dr. James R. Clark
Organization Representing: American Association of State Colleges of Agriculture and Renewable Resources & College of Agriculture, Nursing, and Natural Resources, West Texas A&M University, WTAMU Box 60267, Canyon, TX 79016-0001
Telephone: (806) 651-2585
Fax: (806) 651-2669
E-Mail: jclark@mail.wtamu.edu
Alternate Address: Washington Liaison: American Association of State Colleges and Universities, 1307

New York Avenue, N.W, Fifth Floor, Washington, DC 20005-4701
Telephone: (202) 293-7070
Fax: (202) 296-5819
Web Address: WWW.AASCU.ORG

Testimony on Integrated Research, Education, and Extension Competitive Grants Program Section 406 - Agricultural Research, Extension, and Education Reform Act of 1998

Dr. James R. Clark, President
American Association of State Colleges of Agriculture and Renewable Resources
Dean, College of Agriculture, Nursing and Natural Sciences

The American Association of State Colleges of Agriculture and Renewable Resources (AASCARR) is an organization that represents 55 state colleges and public non-land-grant universities emphasizing education in agriculture and renewable resources. Many of the universities have programs in graduation education, research and public service.

AASCARR institutions:

- provide quality educational programs;
- contribute to the training of under-represented groups for careers in agriculture and renewable resources; and,
- partner with their communities by engaging in educational programming to implement new technology.

AASCARR is dedicated to promoting leadership in agricultural and renewable resource academic programs by:

- advocating members' collective interest, needs, and values to the agriculture industry, policy makers, and the public;
- providing a forum to disseminate information, address critical issues, solve problems, and share ideas;
- facilitating the development of innovative, forward-looking programs that ensure sustainability of food and agricultural systems; and
- developing priorities for globalization of academic research and outreach programs.

The AASCARR supports the establishment of the new integrated account under Section 406 of the Agriculture Appropriations Act of FY 2000. Creating an account *open to competition from all colleges and universities* enhances the funding opportunities for the highest quality and most relevant projects.

A well-educated work force is the requirement to secure a strong future for agriculture in the United States. This work force must be knowledgeable about the latest technological advances and research to preserve the availability of an inexpensive, yet high quality, source of food for the American consumer. Increasing opportunities for quality research, education, and extension projects and preserving the vital element of open competition for all colleges and universities are the foundation for a strong agrarian future. Recall that every major advance in American agriculture has been the result of the efforts of education and trained agriculturists. It is for these reasons that AASCARR respectively requests that you preserve the unique and competitive nature of the integrated account, as well as making the money available for educational projects.

AASCARR works closely with the Academic Programs Section (APS) of the National Association of State Universities and Land-Grant Colleges' (NASULGC) Board on Agriculture to promote:

- academic programs in agriculture and renewable resources;

- allied disciplines such as human sciences and family and consumer sciences; and,
- the Office of Higher Education of U.S. Department of Agriculture and its programs.

AASCARR's recommendations for implementation of Section 406 are:

- funds be open to competition from all colleges and universities including public non-land-grant universities; projects must demonstrate true functional integration of higher education, research, and extension;
- projects be limited to applied education, research, and extension projects;
- review panels include representation from all areas of education, research, and extension;
- project funds be administered centrally;
- use electronic means for proposal submissions; and
- develop a system that uses a pre-proposal process.

Name: Nancy H. Bull, Associate Dean, Outreach and Public Service and Cooperative Extension Service
Organization Representing: University of Connecticut, College of Agriculture and Natural Resources, Cooperative Extension System, 1376 Storrs Road, U-134, Storrs, Connecticut 06269-4134
Telephone: (860) 486-1987
Fax: (860) 486-0264
Web Address: www.cant.uconn.edu

December 6, 1999

Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, STOP 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

Dear Ms. Joya:

I am pleased to offer the following comments regarding the Integrated Research, Education, and Extension Competitive Grants Program, more specifically known as Section 406 of the Agriculture Research, Education and Extension Reform Act of 1998.

We are supportive of efforts to foster greater coordination and integration of research, extension and education programs within the Land Grant University System. At the University of Connecticut considerable benefits have been gained through the adoption of an integrated approach.

One of our programs most affected by Section 406 is the Water Quality program. Over the past few years, we have been fortunate to be able to effectively use Extension 3/d Water Quality funds to develop and implement a number of innovative and effective water quality programs across the State. In some cases, such as with the NEMO program (Nonpoint Education for Municipal Officials) our efforts have been recognized, supported and implemented at the national level as well.

In developing and conducting water quality programs, we have found the CSREES Extension Water Quality Strategic Plan, adopted in January 1998, to be a useful guide. The plan has enabled us to work with partners and other Extension organizations to provide the educational leadership that enables individuals, industry, and government to effect changes that protect the water resources for the public good. I am pleased to note that this plan was reaffirmed at the recent National Water Quality Coordinators Meeting in St. Louis at the end of October.

The availability of 3/d funds on a long term basis has enabled our faculty and staff to come to the table with funds in hand when developing partnerships, making us a legitimate player on the water quality scene in Connecticut. As a result, partnerships have been established with a wide variety of federal agencies including the National Park Service, Environmental Protection Agency, National Oceanic and Atmospheric Administration and Fish and Wildlife Service.

In addition, partnerships have been formed with a number of state and local public agencies and private organizations including the Quinnebaug-Shetucket National Heritage Corridor, the Nature Conservancy, Connecticut Department of Environmental Protection, land trusts and local municipalities.

In a number of instances, we have successfully integrated research and extension. However, I should note that has not always been the case, and we have found that the adoption of a "one size fits all" approach is not always the most effective and useful.

A case in point is our ability to be responsive to emerging issues, especially as related to Extension. Water quality education efforts have proven to been highly effective due to the availability of Water Quality Program Support funds. As a result, I ask that you take a close look at possible mechanisms that would provide an opportunity to provide long term program support funding, may it be for Extension or Extension-Research purposes. Operating with year-to-year funding for educational efforts is difficult in terms of quality programming and faculty retention.

Attached please find additional information for your consideration that has been prepared by the Northeast Region Extension Water Quality Coordinators, entitled NE Region Response to Section 406 RFP, November 29, 1999.

The development of an integrated program at the national level must consider all aspects of the research, extension and academic programs, whether it be for water quality, food safety, or pesticide impact assessments. In addition, there must be a provision for a variety of funding sources for application at the regional and state level, including program support funding which would enable CSREES to meet both national, regional and state needs.

Lastly, I would like to express a more immediate concern about the movement of existing 3d program funds for food safety, water quality, and pesticide impact assessment into the 406 account with no advance notice. For a long time, monies for these programs have been used for faculty salaries and operating expenses for those providing specialized leadership in these areas.

This will be a difficult transition year for these three programs and for the faculty who have provided leadership. I respectively ask that CSREES use every possible option available to help us through this transition year since there was no lead time to make fiscal and faculty adjustments.

Sincerely,

/s/
Nancy H. Bull
Associate Dean, Outreach and Public Service
Associate Director, Cooperative Extension System

cc: Dr. Charles Laughlin
Dr. Dan Godfrey, Chair, ECOP
Dr. Myron Johnsrud, NASULGC

Name: D. Merrill Ewert, Director and Associate Dean

Organization Representing: Cornell University, Cooperative Extension , Administration, 276 Roberts Hall, Ithaca, New York 14853-4203
Telephone: (607) 255-2237
Fax: (607) 255-2473
E-Mail: cedir@cce.cornell.edu

December 13, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES
STOP 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

Dear Ms. Joya:

As Director of Cornell Cooperative Extension, I want to comment on the implementation of the Integrated Research, Extension, and Education Competitive Grants Program known as Section 406 of the Agricultural Research, Extension, and Education Reform Act of 1998 (AREERA). While we understand and appreciate the intent of Section 406, the process through which it is being implemented raises several concerns.

First, the movement of existing 3(d) program funds for fiscal year 2000 is a major problem for highly successful water quality, food safety, and pesticide impact assessment programs that have delivered what they promised—and more. These funds link with other initiatives that contribute to the effectiveness of the very outcomes that they were designed to generate. At Cornell, the water quality funds (that would not be shifted to Section 406) increase the reach and effectiveness of USEPA funds allocated under Section 319 of the Clean Water Act. These 3(d) funds are used by many of our land-grant universities to support faculty salaries and operating expenses for those offering special leadership and continuity for these programs. Without ongoing core support in the areas of water quality, food safety, and pesticide impact assessment, it is likely that the land-grant universities will lose some of the very staff required to make these efforts successful. It will therefore be particularly important to be flexible as Section 406 is initiated.

Second, we are deeply concerned about the process through which Section 406 is implemented. It is essential that the time from when CSREES has access to these funds, and when they are available to the successful applicants in the competitive grants process, be held to four or five months. Sustaining a program such as this on year-to-year funding is difficult; not knowing whether or not you have been successful (and having access to these funds) until later in the fiscal year will make it much more difficult to maintain quality programs and retain faculty. In addition, I urge you to follow a merit review process as defined in the AREERA rather than the peer review process. The latter is well-known to be very time consuming. With the current change, there is an opportunity to streamline the decision making process and to assure the relevance as well as the quality of the proposals being considered.

Third, we believe that the funding allocation process should be managed by the CSREES rather than through the unit that administers the National Research Initiative (NRI). Cornell has been very successful in obtaining support through NRI. Section 406 funds are intended to promote applied research and extension on important issues, but to do so in a timely and efficient way. The NRI, however, is focused on more basic research and the process has a well-earned reputation for being cumbersome and time-consuming. A streamlined, action-research review process for Section 406 would serve both the state and federal partners—not to mention the citizens who are demanding greater efficiency from government. One well-managed review system (rather than administering these funds on a regional basis) would better accomplish the intentions of Section 406—to promote integration and to stimulate multi-state, multi-institutional, and interdisciplinary focus on the significant national, state, and local problems facing our society.

Cornell Cooperative Extension stands ready to assist in the successful implementation of this program but we urge CSREES to be flexible as we move ahead in order to support the integrity of existing programs.

Sincerely,

/s/
D. Merrill Ewert
Director and Associate Dean

cc: Congressman Maurice Hinchey
Congressman James Walsh
Congressman Sherwood Boehlert
Congressman Amo Houghton
Senator Charles Schumer
Senator Daniel Moynihan
CSREES Administrator Charles Laughlin
Under-Secretary Miley Gonzalez

Name: Carol S. Whitaker, EdD., CFCS, Director
Organization Representing: Agriculture Human and Natural Resources, American Samoa Community College

Integrated Research, Education, and Extension
Competitive Grants Program

The following remarks focus in the negative impact that changing Water Quality, Food Safety, and Pesticide Impact Assessment from 3-d formula funding to section 406 funding will have on these programs in American Samoa. While I can only speak for American Samoa, I am sure that other two-year Land Grant Institutions will experience similar difficulties.

American Samoa Community College (ASCC) is a two-year institution. Section 406 grants are open to four year institutions. As a result, we can neither apply nor receive money for the programs that were once a strong and viable component of our extension programming. This will no doubt drastically alter our ability to continue offering services in these areas. If section 406 were opened to two-year institutions, ASCC would find itself at a disadvantage in competing for grants with major universities. ASCC does not have the breath and depth of professional staff or the strong support infrastructure found at major institutions. I suggest that a plan be implemented allowing the two-year institutions to submit grants that would be competitive and could be funded.

Name: Dr. J.M. Chandler, President
Organization Representing: Weed Science Society of America
Web Address: http://www.uiuc.edu/ph/www/wssa/

Ms. Terri Joya
Competitive Grants and Awards Management
USDA/CSREES
Stop 2240, 1400 Independence Avenue
Washington, DC 2025~2240

Dear Ms. Joya:

I am writing on behalf of the Weed Science Society of America to express our concerns about administration of Section 406 funding.

We are concerned about the difficulty of maintaining a nationally dispersed agricultural research, education, and extension infrastructure through a competitive grants program. The current system of local expertise in states throughout the country has been successful because it is appropriate for promoting the local application of science. This is especially pertinent when the science must be tailored to unique local conditions of climate, soils, crops and markets.

We are also concerned about the transition process that lies ahead. The current system is in place and ready to respond to ongoing needs and unpredictable needs that may arise. It is a system that cannot be recreated instantaneously if it is dismantled because it relies on many highly experienced people. Severe realignments will also send a negative message to current and future employees about the desirability of agricultural research and extension careers.

Weed scientists rely heavily on the system of nationally dispersed agricultural professionals. By discussing the differences in performance of weed management programs at different locations we increase our understanding of our technology. Our science will suffer if it is concentrated too narrowly at a limited number of research institutions or in a limited number of crop producing regions. Concentration of research at elite facilities that focus on the major crops may also lead to neglect of the needs of minor crop producers in niche environments around the county.

The Food Quality Protection Act (FQPA) requires reliable information about local pesticide use patterns to perform valid FQPA risk assessments for individual pesticides. USDA relies almost exclusively on the local Land Grant presence in each state to acquire these pesticide use profiles. A local presence is also critical when EPA determines that risk mitigation must be implemented for particular pesticides. Fine tuning of pesticide use to reduce risks, while still providing acceptable crop protection will only be effective when research and extension professionals understand the subtle nuances of local crop production systems.

In summary, we urge you to implement 406 funding in a manner that reflects the value of local and regional expertise to promote the local application of science. Much of the value within the system will be lost if decisions about research and extension funding become too highly centralized and far removed from the environment where they can be applied. As the grant awarding mechanism is developed we strongly encourage the use of state and regional review committees to accurately assess the applicability of the proposals submitted.

Sincerely,

/s/
Dr. J.M. Chandler
President

cc: Dr. Charles Laughlin

Name: Cameron R. Hackney, Chair
Organization Representing: Council on Food Science Administrators
Telephone: (540) 231-5247
Fax: (540) 231-9293
E-Mail: hackey@vt.edu

As Chair of the Council of Food Science Administrators (CFSA) I am providing the following comments on

behalf of the group on the CSREES Integrated Research and Extension Grant Program for fiscal year 2000. The Council of Food Science Administrators is composed of academic leaders that provide the vision, leadership and advocacy of Food Science. The membership of The CFSA consists of any person who is responsible for the food science program of a recognized university or college such as a department chair, head, or program coordinator. In addition any person who is Dean, Director or President at a recognized University or College with management or administrative responsibilities over a program of food science or any person who is in a Government Administrative role with responsibility over major programs of food science may become an Associate Member. The Departments of the CFSA represent the bulk of the units that have been funded through the Food Safety Special Research Grant Program and the Food Safety and Quality Extension Program.

The FSA commends USDA/CSREES for their previous administration of the Food Safety Special Research Program and the Food Safety and Quality Extension Grants Program. Now that these programs have been combined into a new $15 million Food Safety Integrated Grants program the CFSA recommends that this new initiative be nationally competitive and under the administration of USDA/CSREES. It is recommended that the new program relate to international, national and regional issues that impact on the safety of the U.S. food supply.

The program should have an applied research component focusing on areas such as risk assessment models and information in support of risk assessment, the scientific basis for HACCP, fresh fruit and vegetable safety, anti-microbial resistance, and sources and incidence of food-borne pathogens. A second area of the program should be for competitive grants to support extension/outreach projects on important issues related to food safety from primary agriculture production to transportation, processing, retail and consumers. A third area would be for support projects that related to an research/extension activities such as the application of new technology through demonstration projects and pilot plant scale-up and related training on food safety. All competitive research should have an outreach component. The program should encourage a multi-disciplinary and multi-institutional approach. It is important that the program be transparent in its administration and that proposals for each area be evaluated by peer panels representing a range of food safety expertise in government, universities, and industry.

It is strongly recommended that the extension component have a program development component. In the past years these “Plan of Work” funds were for $25,000 to $30,000. Cooperative Extension is uniquely positioned to impact food safety for all citizens. It is important that all states have food safety programs. It is further recommended that this allocation be increased to $50,000 per state.

Sincerely,

/s/
Cameron R Hackney
Chair, Council Food Science Administrators

Name: Susan S. Sumner, Ph.D.
Organization Representing: Virginia Polytechnic Institute and State University, Associate Professor Extension Project Leader, Department of Food Science and Technology, Blacksburg, Virginia 24061-0418
Telephone: (540) 231-5247
Fax: (540) 231-9293
E-Mail: Sumners@vt.edu

December 25, 1999

The members of S 263 Enhancing Food Safety Through Control of Food-borne Disease Agents are providing comments on the CSREES Integrated Research and Extension Grant Program for fiscal year 2000. This

regional project is administered through the southern region, but participants also come from other regions. Active Participants are from AL, AK, IA, MI, MN, MS, NC, NE, NY, SC, and VA. This regional research project was initiated through the efforts of extension faculty seven years ago to better integrate extension and research. Therefore, this group would like to commend USDA/CSREES for their previous administration of the Food Safety Special Research Program and the Food Safety and Quality Extension Grants Program. Many of the individuals involved in this project have received funding from the Food Safety Special Research Grant Program and the Food Safety and Quality Extension Program.

The members of S 263 are delighted to see the combined $15 million Food Safety Integrated Grants program and recommends that this new initiative be a nationally competitive program managed by USDA CSREES. The members would like USDA CSREES to continue a focus on multi-state and multi-disciplinary projects that allow states to maximize their food safety efforts. It is strongly recommended that tbe extension component maintain a program development component. In the past years these "Plan of Work" projects were for $25,000 to $30,000. Cooperative Extension is uniquely positioned to impact food safety for all citizens and these projects have demonstrated numerous impacts the last several years.

The members feel that the program should be for $7 million in competitive grants to support extension/outreach projects. A second area would be the research component of the program, which should have a $5 million applied research focus. Topics to be addressed by both programs should be integrated and build on each other. A third area would be new. This program would be for about $2 million to support projects that relate to a research/extension activities such as the application of new. All competitive research should have an outreach component. Peer panels representing a range of food safety experts in government, universities, and industry evaluate proposals for each area.

Sincerely

/s/
Susan S. Sumner
Associate Professor and Extension Project Leader
Past-chair S263

Name: John C. Nye, Dean
Organization Representing: University of Delaware, College of Agriculture and Natural Resources, Office of the Dean, Townsend Hall, Newark, DE 19717-1303
Telephone: (302) 831-2501
Fax: (302) 831-6758
E-Mail: nye@udel.edu

December 6, 1999

Charles Laughlin
Administrator
United States Department of Agriculture
Cooperative State Research, Education, and Extension Service
Room 305-A Jamie L. Whitten Building
12th & Jefferson Drive, SW
Washington, D.C. 20250

Dear Dr. Laughlin:

I am writing regarding the recent listening session USDA sponsored over the implementation of the new Section 406 as authorized in the Agricultural Research, Extension, and Education Act of 1998. Several

groups and colleagues provided testimony with guidance on the implementation of the 406 accounts. These testimonies represented in whole a broad consensus of the respective communities involved in this new account.

You heard testimony from Jeff Richards, the coordinator of the Northeast Food Safety Initiative (SAFER) and me, representing the Northeastern Regional Association of State Agricultural Experiment Stations. This letter is to emphasize my endorsement of the proposal to implement Section 406 as a regional based competitive grant program similar to the IPM program. As Dean of the College of Agriculture and Natural Resources, Director of the Delaware Agricultural Experiment Station, and Director of Delaware Cooperative Extension, I am in charge of our teaching, research, and extension programs. The regional offers the most effective method to integrate these functions to solve food safety, water quality, and pesticide related problems. The regional approach offers the most effective method for addressing the critical issues facing the nation. Dividing the Section 406 appropriation into fifths, one-fifth for each geographic region and one-fifth to the 1890 institutions will insure fairness in the awards and relevance to the unique regional issues. CSREES staff would oversee the process and insure quality control while capitalizing on the land-grant federal-state partnership.

Thank you again for providing this opportunity to comment on the implementation of the new Section 406 Competitive Grants Program. Should you have any questions, please contact me at (302) 831-2501 or email at nye@udel.edu.

Sincerely,

/s/
John C. Nye
Dean
University of Delaware

Cc: Dr. Colien Hefferan (Associate Administrator)

Name: Dr. James Tollett
Organization Representing: Southern Arkansas University, Magnolia, 100 East University, Magnolia, Arkansas 71753-5000
Telephone: (870) 235-4000
Fax: (870) 235-5005
Web Address: www.saumag.edu

December 8, 1999

The Honorable J. Miley Gonzalez
Under Secretary for Research, Education, and Economics
United States Department of Agriculture
1400 Independence Avenue, SW
Room 217-W
Washington, D.C. 20250

Dear Under Secretary Gonzalez:

Southern Arkansas University, Magnolia, Arkansas, a member of the American Association of State Colleges and Renewable Resources (AASCARR) supports the establishment of the new integrated account under Section 406 of the Agricultural Appropriation Act of fiscal year (FY) 2000. Creating an account open to competition from all colleges and universities provides a wider clientele of expertise to undertake and

complete projects expedient to obtaining information needed to sustain the agriculture community.

Competition among all colleges and universities enhances the possibility of providing information for the production of inexpensive and high quality food to the purchasing public of America. All major advances in food production of American agriculture is the result of research at all agriculture institutions and their training of outstanding agricultural scientists. We of Southern Arkansas University Agriculture Department respectively request you preserve the competitive nature of the integrated account, as well as making the funds available for competitive agricultural educational projects.

Sincerely

/s/
Dr. James Tollett
Chair and Professor of Agriculture, Southern Arkansas University
Vice-President of AASCARR

JT/ds

Name: Daryl B. Lund
Organization Representing: Cornell University, College of Agriculture and Life Sciences, Office of the Dean
260 Roberts Hall, Ithaca, New York 14853-4203
Telephone: (607) 255-2241
Fax: (607) 255-3803

December 8, 1999

Mr. Charles Laughlin, Administrator
United States Department of Agriculture
Cooperative State Research, Education, and Extension Service
Room 305-A Jamie L. Whitten Building
12th and Jefferson Drive,
Washington, DC 20250

Dear Chuck:

I am writing to indicate my support for implementing the new Section 406 (as authorized in the Agricultural Research, Extension, and Education Act of 1998) as a regionally administered program.

On December 2, you heard testimony from Jeff Richards, the coordinator of the Northeast Food Safety Initiative (SAFER) endorsing a plan to implement Section 406 in a manner similar to that used to support Integrated Pest Management (IPM) and Sustainable Agriculture through Research and Education (SARE) (attached). It is my belief that it would be the most efficient and expeditious way to enable a strong program in food safety.

Thank you again for providing this opportunity to comment on the implementation of the new Section 406 Competitive Grants Program. Should you have any questions, please contact me.

Sincerely yours,

/s/
Daryl B. Lund

Ronald P. Lynch Dean of
Agriculture and Lie Sciences

/dl

cc: Colien Hefferan
Miley Gonzalez

Name: Jeff B. Richards, Project Coordinator
Organization Representing: Northeast Food Safety Initiative, Safe Agriculture and Food through Education and Research (**SAFER**)

PUBLIC COMMENTS
by
Jeff B. Richards
Project Coordinator
Northeast Food Safety Initiative
Safe **A**griculture and **F**ood through **E**ducation and **R**esearch
(**SAFER**)

to the

Cooperative State Research, Education, and Extension Service (CSREES)
U.S. Department of Agriculture
on the

Implementation of Section 406
of the
The Agricultural Research, Extension and Education Act of 1998
(1998 AREERA)

December 2, 1999
Washington, DC

Thank you for providing the opportunity today to comment on the implementation of the new Section 406 Integrated Research, Extension, and Education Competitive Grants Program. We are pleased to see that there is a continued interest in promoting integrated activities to address the critical issues in agriculture. This integration provides a unique network for research, extension, and education to resolve the agricultural issues in our communities.

My name is Jeff Richards, I am the Project Coordinator of the Northeast Food Safety Initiative (SAFER). I am here today on behalf of this consortium of Land-Grant universities to talk about food-safety.

Issues: The threats posed by the spread of new and emerging food-borne pathogens and diseases are increasing as a result of increasing international trade and lack of sanitary conditions and regulatory actions. It is also increasing partially due to an increasing proportion of susceptible subpopulations. These include aging, young, or immunosuppressed people, as well as growing populations in developing countries. New pathogens and infectious organisms appear to be becoming more virulent as a result of the development of new antibiotic resistant strains and the emergence of foreign diseases or those which have not been previously associated with human or animal disease. Both new and emerging organisms are often undetectable and (or) untreatable by traditional techniques. These factors lend to the potential of transmission of illness and antibiotic resistant microbes through food products and animal populations.

Such outbreaks can lead to both acute symptoms and chronic conditions in humans and animals, causing severe economic losses, and suffering.

Food safety has become a primary consideration for consumers nationwide. Much of the concern has come from the popular press accounts of food-borne outbreaks that suggest that the nation's food supply has been compromised by technology and vertical integration of the food industry. In fact, statistics suggest that today's food supply is as safe as ever, and still the safest in the world but more needs to be done in understanding the tolerance for risk to address real and imaginary food safety hazards. Better methods for analyzing, identifying, and managing new and emerging hazards is critically needed so that research results, new technologies, and training can be employed from the "farm-to-table". In result our agricultural food products can be processed under economically efficient methods and safer conditions to eliminate the potential for food-borne toxins, pathogens or diseases to develop.

History: In recent years the Land Grant Universities of the Northeast have moved to a more functionally integrated approach to multi-institutional collaborations. The region has been concerned with many of the food safety issues associated with seafood, meat and poultry, and fresh fruit and vegetable food-borne illnesses. The NE Land-Grants have joined efforts to utilize the strengths of the various institutions and partners to provide a food production, processing, marketing, and consumption system that is free from food-borne toxins and microbes. The Safe Agriculture and Food through Education and Research (SAFER) Initiative is a regionally developed effort to be implemented at the local, state, and national level, and is directed towards increased food-safety teaching, extension, and research.

As the federal government moves forward in the process of converting the nation's food-safety assurance system from one of inspection to one of risk-management under the Hazards Analysis Critical Control Point (HACCP) system, the identification of the key food processing risks are being identified and plans are being implemented for dealing with those risks. This delegation of food safety responsibility to food processors and handlers will require adequate research and education efforts for success. Safe food depends upon broad-based understanding of the causes of food-borne illness, paths to prevention, and a commitment to preventive practices employed by producers, processors, handlers and consumers. Much like the successes of the regional Integrated Pest Management (IPM) and the Sustainable Agriculture through Research and Education (SARE) programs producers are joining in efforts with Cooperative Extension educators to apply management programs and new technologies that best resolve the local and regional agricultural needs.

A majority of the food safety issues both nationally and internationally are parallel in nature. However, there are elements of food safety, which highly pertain to the localized influences on the development of these food-borne hazards. There are geographical differences alone that play into the variables affecting the food agriculture within that area. For example, seafood and shellfish food safety concerns lies heavily in the Northeast Region of the U.S. Many of the concerns would pertain exclusively to the environmental influences on the water bodies that host these organisms. Other commodities share similar regional concerns in the nature of their ability to become contaminated. However, they are usually brought about under different regionally distinct environmental conditions. Specifically food-borne organisms are highly dependent on the local environmental conditions that allow them to flourish.

Mechanisms to Manage the Integrated Activities Grants Program: In discussing the options for CSREES implementation of the new Section 406 competitive grants program, a variety of mechanisms have surfaced:

Our preferred model would be to organize the food safety competitive funds into a program similar to the manner of the regional IPM competitive grants program. The IPM funding is annually apportioned to regions that set priorities for research and extension, and assist in the development of the request for proposals (RFPs). A grant manager empanels a team of peer reviewers from other regions to evaluate the proposals received. Recommendations are then made to CSREES for funding based *inter alia,* on scientific quality, merit and relevance to regional needs. Institutional participation is not exclusive to that region, in that PIs

outside the region may join with one or more PI's from within the region to form a proposal. Thus the regional organization of the IPM program is more in terms of priorities, rather than institutions. Both extension and research projects are funded through this model. Similarly, the regional SARE program's model is very similar to the IPM model.

One of the great advantages of having regional facilitation of the food safety grants would be that the organizational structure and mission to partner with other federal agencies and have an established set of relationships with different agency players in this topical area. SAFER would aim to leverage food safety program dollars with other agency funding, to increase the net total funding of the grants program. We feel this leveraging with other agency funding would directly serve Land Grant System needs and meet the intent of congress and other agency agendas via partnership development and efficient use of resources.

Next Steps: This proposal offers several advantages to USDA when compared to the NRI model alternative. These advantages include: cost efficiencies, relative to centralized management; stronger support for partnership activities; more responsiveness to regional priorities; and proven methods for managing functionally integrated activities. The advantages for the state partners will be in: opportunities to partner with other federal agencies who share our common agendas; designation of grants larger than traditionally awarded to support multi-state and integrated activities; and more direct participation in the planning and reporting of these activities.

Aspects of regional implementation model: Under conditions of a regional competitive grants program, much of the existing personnel and committee resources within the university teaching, research, and extension system can be utilized. Regional technical committees could be formed to assess regional priorities and collect input from stakeholders. The regional committees could develop and draft the RFP to respond to the regions specific issues. The regions could utilize the extra-regional specialists to review their regions grant proposals, as to limit conflict of interests.

The regional committees could have a chair to coordinate interregional activities for the food-safety competitive grants. Recommendations from the peer review panels would be submitted to the partnership agency(s) for final approval and direct awards by the agency.

We believe that the functionally integrated regional IPM and SARE programs offer the best models for implementation of the integrated activities account under Section 406. Our preference is for emulating both the strong stakeholder involvements in SARE, and the managerial efficiency of the regional IPM programs. A significant amount can be learned about the grant management from the IPM and SARE models. These programs, review integrated proposals, and have had success in administering a competitive awards program that takes into consideration research and extension education activities. Therefore, some combination of these programs seems to be the most logical strategy.

Thank you for this opportunity to comment.

Name: John C. Nye, Chair
Organization Representing: Northeastern Regional Association Of State Agricultural Experiment Station Directors (NERA)

PUBLIC COMMENTS
by
John C. Nye
Chair of the
Northeastern Regional Association
Of

State Agricultural Experiment Station Directors
(NERA)
to the
Cooperative State Research, Education, and Extension Service (CSREES)
U.S. Department of Agriculture
on the
Implementation of Section 406
of the
The Agricultural Research, Extension and Education Act of 1998
(1998 AREERA)

December 2, 1999
Washington, DC

I appreciate the opportunity to comment on the implementation of Section 406 of the Agricultural Research, Extension and Education Act of 1998 (1998 AREERA), which represents a new approach to competitively funding integrated activities in extension, education and research in targeted areas. I am presently Chair of the Northeastern Regional Association of State Agricultural Experiment Station Directors, an organization of the leaderships of the 15 State Agricultural Experiment Station administrators of the Northeast region of the U.S. I am also Dean of the College of Agriculture and Natural Resources at the University of Delaware, and Director of that state's Agricultural Experiment Station and Cooperative Extension service. Thus, my responsibilities extend to the three primary functions of a contemporary Land-Grant University; teaching, research, and service.

Our Land-Grant University community is well aware the Section 406 authority, and the fiscal year (FY) 2000 appropriation of funding for Section 406. Section 406 represents to us both a significant challenge and a distinct opportunity to address some important topics.

My comments today will be directed to aligning this new authority with the historically important Federal-state partnership, a tradition that holds as much importance today as when it was first established in 1862. Let me explain some perspectives.

The creation of the Land-Grant Universities in 1862 was an elegant solution to the constitutional consideration that the federal government had no business in the education of students. That responsibility was delegated to the states. Strict constructionists, such as Thomas Jefferson, held firm to the principle that the Federal government must not engage directly in higher education. Early in this country's history several attempts by members of Congress to create a federal university system were voted down on the basis of violating the principle of states' rights.

In 1862 Justin Smith Morrill introduced legislation to support states in the creation of a visionary system of state-based higher education for the masses. Virtually bankrupted by its engagement in the Civil War, the Federal government gave grants of land to states to be used to start a university in agriculture and the mechanical arts, and hence the origin of the name Land-Grant. New York got a parcel in what is now Wisconsin. Rhode Island's land was in what is now Kansas.

The system has both evolved and flourished. In 1887 the Land-Grant Universities were assigned Federal-state partnership responsibilities for agricultural research, which continues to be funded through the Hatch Act. In 1914 the responsibility for technology transfer and non-credit adult education was given the Land-Grant Universities, and was again funded by a formula distribution to the partner institutions, through the Smith-Lever Act. These Federal formula funds require an equivalent state match, consistent with the notion of true a partnership. Matching funds to support the research, teaching and extension missions at these Land Grant Universities today are about 10 times the federal appropriation. Today, the Land-Grant University system is the envy of the rest of the world. It is a unique enterprise created to preserve states rights.

Section 406 represents a great opportunity for the Land-Grant Universities to extend their work into important areas deemed worthy by Congress for teaching, research and extension attention. We agree, and support the wishes of Congress. We stand ready to engage in this activity. But we are also concerned for the challenges of programmatic implementation of Section 406. Implementation must be done in ways that support our history, and builds on the Federal-state partnership's tradition. We need to carefully select an implementation process that best fits our partnership's needs.

After much thought and discussion, we are recommending a distributed system for the organization of the integrated activity competitive grants authority of Section 406. Centralization of this program within the agency would be counter to the traditions of the Federal-state partnership, and would detract from the joint planning necessary for our partnership to function well.

We see the regional Integrated Pest Management (IPM) program as an excellent example of a distributed, competitive grants program that meets the needs of the partnership, and the intent of Congress. In a moment I will list the benefits, but first I want to note how the regional IPM program functions. Please recognize that there are regional differences, but the following description is a good representation of the process, I believe.

Regional technical committees are asked to work with stakeholders in developing a set of regional priorities, which are then translated into a request for proposals (RFP). The RFP is then submitted to the agency for review and, once approved, it is publicly announced. Working with the responsible CSREES National Program Leader (NPL), the region's grants manager invites a peer panel chair, who in turn selects her panel members, all with the oversight of the NPL coordinator. Peer panels are always made up of a balance of research and extension specialists that are not from that region, thus greatly reducing potential conflicts of interest. Care is taken to fit the panel to the array of proposals and give balance to functions, geography, diversity, and disciplines.

After evaluating the assigned proposal and drafting comments, the panel meets face-to-face to rank the proposals for several criteria. Evaluation typically includes: scientific quality and technical merit; relevance to regional priorities; technical feasibility; and likely impact. The highest ranked proposals are then recommended to the agency for funding. Typically, the CSREES NPL attends the peer panel meeting, and thus has first hand knowledge of the panel's deliberations, in addition to full documentation. None of the money is awarded by the agency until the agency is satisfied with the quality of the peer reviews.

Here are some advantages of the regional IPM competitive grants model:

Assurance of high quality activities through peer review processes; Targeted relevance through regional stakeholder input; Greater responsiveness to regional needs; Proven integration of institutional functions through competitive grants; Multi-state participation in specific projects; and Extra-regional participation through multi-institutional projects.

To this last point I wish to dispel a myth. Regionalization does not mean strict borders to participation. In fact our history of regional research is too often misrepresented as regionally bounded, when in fact more that two-thirds of our base program's regional activity involves three or more regions' institutions. Moreover, Federal agencies, the private sector research laboratories and state agencies commonly participate, through their own funding. But most importantly is the extent to which extension and research projects are already integrated within and across regions in dozens of formal and informal project and activities.

We are proposing that the implementation of AREERA Section 406 be built on our institutional strengths, not create divisive competition within and between the Land Grant Universities. We strongly recommend a distributed process that uses the best of the regional IPM program's innovations to move us forward as a partnership.

Thank you for the opportunity to comment.

/s/
John C. Nye
Chair, NERA (Northeastern Regional Association of State Agricultural Experiment Stations)
Dean, College of Agriculture and Natural Resources Director, Delaware Agricultural Experiment Station
Director, Delaware Cooperative Extension

Name: Lawrence Busch
Organization Representing: Michigan State University, Institute for Food and Agricultural Standards, 433 Berkeley Hall, East Lansing, Michigan 48824-1111
Telephone: (517) 355-3396
Fax: (517) 432-2856
E-Mail: Lawrence.Busch@ssc.msu.edu
Web Address: http://www.msu.edu/user/buschll

November 27, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, STOP 2240
1400 Independence Avenue, SW
Washington, D.C. 20250-2240

Dear Ms. Joya,

I would like to take advantage of the opportunity to comment on the Integrated Research, Education, and Extension Competitive Grants Program, and specifically on the Food Safety part of that program. USDA is to be applauded for initiating new research opportunities in this area of considerable national concern. Yet, despite considerable new monies for food safety projects and programs, many of the most important food safety questions are nowhere to be found in the USDA intramural or extramural research programs.

For example, little or no research is being conducted on:

1. the impact of scale and organizational structure of processing and distributing firms on food safety;
2. the impact of changing industry structure (e.g., vertical coordination and integration, lengthening of food supply chains) on food safety;
3. consumer understanding of food safety and food safety practices;
4. differences in consumer and scientific understandings of risk factors in food;
5. distribution and total costs of different approaches to food safety improvement;
6. effectiveness of restaurant food safety practices;
7. understanding by food processing workers of food safety issues; and,
8. consequences of various new food safety practices and regulations for small processors and retailers.

I would hope that USDA would begin to tackle these issues in the near future, either through competitive grants or intramurally. I sincerely doubt that food safety problems can be adequately reduced while ignoring these vital issues.

Thank you for your attention. Should you wish to discuss this matter further, I would be more than happy to do so.

Sincerely,

/s/
Lawerence Busch
Director
University Distinguished Professor

Name: Ann R. Lemley, Professor, Chair, Department Extension Leader
Organization Representing: Cornell University, College of Human Ecology, Department of Textiles and Apparel, Martha Van Rensselaer Hall, Ithaca, New York 14853-4203
Telephone: (607) 255-3151
Fax: (607) 255-1093

December 6, 1999

To: Terri Joya
USDA-REE-CSREES -P S -CRGAM
AEROSPACE RM 3RD FL
901 D Street S.W.
Washington, DC 20250

From: Ann T. Lemley, Ph.D
Professor, Chair, Department Extension Leader

Re: Implementation of the Integrated Research, Education and Extension Competitive Grants Program

I would like to provide comment on implementation of Section 406 of the Agriculture Research, Education and Extension Reform Act of 1998 (AREERA). We at Cornell have serious concerns about the movement of the Water Quality extension support from 3d program funds into the Section 406 account. While we understand and are in agreement with the concept of Section 406, this account should have been funded from new money, not from core funds that have been successfully leveraged nationwide for critical, core extension programs.

Since the movement of these funds is a reality for fiscal year 2000, we strongly urge that significant flexibility be retained for using these funds to provide continued support for successful water quality extension programs that have shown major impacts. In New York State, for example, we have been able to use these funds to support programs that are also partially funded by USEPA under Section 319 of the Clean Water Act. We urge that base funding be provided to each state to continue to seed such important extension programs. Making all these funds competitive is like demanding that we fund our curriculum in academic programs through a competitive process. Extension programming is somewhere in between the research and academic program model. It requires base funding as well as competitive funds for innovative and integrated programs.

I am particularly concerned that CSREES in its administrative rule making should also make these 406 funds available to support the national Farm*A*Syst framework by insuring adequate funds for national coordination and state implementation. Since 1989, CSREES has supported state Farm*A*Syst/Home*A*Syst (FAS/HAS) implementation in part through base support for state water quality programs. Competitive grants also have supported Farm*A*Syst/Home*A*Syst activities. This support has been crucial, for example, in implementing extension programs in the Skaneateles Lake watershed in central New York. Both Home*A*Syst and Farm*A*Syst programs have been successfully implemented to protect this critical drinking water source for the City of Syracuse.

Funds dedicated to FAS/HAS have also been awarded to Cornell to pilot an innovative and exciting extension program that targets limited resource audiences. The project adapts the Home*A*Syst program to be taught as part of the national, USDA, Expanded Food and Nutrition Program (EFNEP) and has shown some critical successes in Delaware and Chemung counties as pilots. Continued support at the state and national level is needed to take this program to a wide variety of counties nationwide. Both a supported national office for FAS/HAS and a pool of dedicated funding is required to make these success stories happen. The national office has been a catalyst for new, collaborative proposals such as the four state effort we wrote to the Department of Housing and Urban Development under its *Health Homes Initiative.*

As important as research/extension integration is, core support to water quality extension programs, and particularly to FAS/HAS is critical to maintaining a highly successful extension effort. The research model, such as the National Research Initiative (NRI) program, is not appropriate for extension education. As a faculty member I willingly compete in the NRI and have been successful twice in the last 4 years. However, we cannot sustain an action-oriented, successful extension water quality educational program using the time consuming and cumbersome approach of the NRI. It would be a critical mistake to do so. The success of the national Water Quality extension program in the past ten years should not be ignored as we look to the future.

While some changes may be necessary, it is critical to retain the aspects of the water quality program that have made it such a success. In the future, water quality funds must be made available through 3d. For the coming year, implementation of 406 must contain enough flexibility to support core extension programs. I strongly urge that you give due consideration to these views, and I thank you for the opportunity to provide them on this very important issue.

cc: Congressman Maurice Hinchey
Congressman James Walsh
Congressman Sherwood Boehlert
Senator Charles Schumer
Senator Daniel P. Moynihan

Name: Craig Runyan, Program Coordinator
Organization Representing: Extension Plant Sciences Department, NMSU Cooperative Extension Service, Box 30003 Dept 3AE, Las Cruces, New Mexico 88003-0003
Telephone: (505) 646-1131
Fax: (505) 646-8085
E-Mail: crunyan@nmsu.edu

Ms Joya,

Below are comments from New Mexico Cooperative Extension Service (NMCES) on Implementation of Section 406 Integrated Research, Extension, and Education Competitive Grants Program. We support and concur with the comments provided by Dr. Eric Norland of the National Advisory/Leadership Team, Dr Daniel Godfrey, Chair of ECOP, and others expressing concern about maintaining the integrity and continuity of Extension Water Quality Programs nationwide.

The following comments address some of the specific ways in which the loss of 3d funding and Section 406 implementation could effect Extension programs in New Mexico.

The New Mexico Cooperative Extension Service (NMCES) takes this opportunity to recommend and support the following actions toward the implementation of Section 406 designed to fund the USDA Integrated Research, Extension, and Education Competitive Grants Program.

- NMCES recommends adoption of the Extension Water Quality Strategic Plan as a guidance for the Section 406 RFP and grant award process.

- NMCES Water Quality programs adheres to the seven goals outlined in the Strategic Plan. This plan is used as a criteria in development and implementation of state Water Quality (WQ) programs. Priority goals of the plan include addressing New Mexico's under-served Hispanic and American Indian audiences, pollution prevention through best management practices, and education of public policy makers.

- NMCES urges that integration of USDA funded water quality projects be program rather than project integrated with research, extension, and formal education. It is without doubt that most of NMCES impact on improving water quality is accomplished through non-traditional outreach education programs. Activities such as workshops for American Indian agricultural producers, homeowner household hazardous waste reduction, and animal waste management for large scale livestock producers do not necessarily require the inclusion of research or formal classroom components to be successful. On the contrary, much of the science is complete and requires only outreach delivery to targeted audiences who can most benefit. Also, New Mexico's rural and minority audiences are far removed from opportunities for classroom focused training.

- NMCES recommends funding only applied research projects that complement the goals of the Strategic Plan. A view functional to this recommendation is that Extension professionals be sufficiently represented in the grant review process. It is our feeling that this process be managed by USDA and not contracted to institutions less sensitive to the needs of Extension, applied research, or education.

- NMCES strongly recommends that particular consideration be given to programs addressing the needs of under-served minority audiences. New Mexico's Extension WQ programs targeting minority populations have a strong need of Extension oriented outreach education. Currently, NMCES has implemented the New Mexico Tribal Lands Water Quality Project with the goals of delivering water quality and natural resources education to tribal members and leaders of the Navajo, Jicarilla Apache, and Zuni reservations. The limited resources and lack of understanding of land use activities impact on water quality by these audiences creates a critical need for continued programming.

- NMCES recommends establishing a mechanism within Section 406 implementation for maintaining Cooperative Extension's capacity for responding to urgent and emergency water quality/quantity needs of the people of New Mexico and the nation. Early 1999 and into the summer saw most of the state of New Mexico falling deep into drought. Many portions of the state were declared in Emergency Drought Status by the Governor. NMCES involvement in the Governors' Drought Task Force and mitigation activities for agriculture, tourism, and public health industries was contingent on funding resources that could not otherwise have been planned for. This is only one example of the often urgent need for quick response to local issues that cannot be anticipated in a grant proposal. The strong national network of Extension professionals that are available for technical assistance in times of urgent need is critical to the maintenance of our reputable programs.

- NMCES urges continuity in funding national replicable programs that provide coordinated leadership and assistance for recognizable and successful programs. Specifically, we support a mechanism be established whereby the National Farm*A*Sys/Home*A*Syst program be continued as a national program. New Mexico Farm*A*Syst has continued to provide a practical effective method by which it introduced pollution prevention practices to a number of different audiences statewide. It's national recognition allows Extension professionals “a foot in the door” when seeking to help land use managers improve practices. Additionally, guidance for the national office minimizes replication and reduces development time for locally adapted risk assessment materials.

- Finally, NMCES recommends that funding priority be given to those Extension Water Quality projects that were awarded competitively for FY99. New Mexico currently has two very promising such projects. The

aforementioned "New Mexico Tribal Lands Water Quality Project" is being implemented through the Indian Extension offices of the Shiprock Navajo, Jicarilla Apache, and Zuni tribes. Activities in progress and planned for these locations include in-school training activities, wellhead protection workshops, irrigation management demonstrations and training, public service announcements for household hazardous waste management, and more. Extension involvement in tribal water commissions, and counsels is an integral part of this project.

“Protejer El Rio”; (Protect the River) is a Home*A*Syst oriented project targeted for eight counties along the Rio Grande from Taos to Truth or Consequences, NM. The project has been modeled after a very successful project with the City of Las Cruces, Dona Ana County entitled "Don't Dump It". It has as it's primary goal a significant reduction in household hazardous waste inflow to municipal wastewater treatment plants that discharge to the Rio Grande. This goal was accomplished by the Don't Dump It campaign. City officials, and utility managers up and down the river are cooperating in "Protejer El Rio"; in the belief that we can accomplish similar results as in Las Cruces.

Each of these projects were projected for three year funding, with fiscal year 1999 being the first year. Technicians for the “Tribal Lands” project have been hired and have begun program delivery. Home*A*Syst materials, brochures, PSA's and scores of other materials have been or are being developed for "Protejer El Rio" for a coordinated Earth Day 2000 delivery date. Continued funding of these projects is imperative to the improvement of practices, effectiveness of first year funding, and the reputation of New Mexico Cooperative Extension Service as being good for our promise to deliver.

In conclusion, NMCES wishes to express concerns over the fiscal difficulties the transition from 3d funding to Section 406 funding is expected to create with regard to faculty salaries. Food Safety, Water Quality, and Pesticide Impact Assessment are important Extension programs in New Mexico. The 3d monies that have for some time supported the salaries of the faculty providing leadership to these programs is now at risk of being lost. Along with that is the potential of having to terminate or re-assign professionals who are most suited to continuing these programs at some level. We respectively urge CSREES to adopt a mechanism by which to minimize unnecessary program gaps due to the loss of faculty. The lead time for the transition to Section 406 is insufficient to make necessary fiscal and faculty changes that will be critical to retaining these individuals.

We thank you for the opportunity to comment. NMCES is ready and willing to assist in a successful transition in the coming months.

/s/
R. Craig Runyan
Program Coordinator

Name: Phil Tacker, Extension Agricultural Engineer
Organization Representing: University of Arkansas Cooperative Extension Service
E-Mail: ptacker@uaex.edu

CC: Gwjackso@facstaff.wisc.edu
Charlotte Fant
Katie Teague
Mike Daniels
Stan Chapman
Tom Riley

As coordinator of the Farm*A* Syst program in Arkansas I would like to support some method that would make it possible for Farm*A*Syst/Home*A*Syst (FAS/HAS) to continue to be a coordinated national

program. We have established FAS/HAS as the basic foundation to our Environmental Education Program efforts in Arkansas. The support of the coordinated national program has been instrumental to date and would enhance our continued efforts on a state level.

Sincerely,

/s/
Phil Tacker
Extension Agricultural Engineer
University of Arkansas Cooperative Extension Service

Name: Jim Anderson
Organization Representing: Water Resource Center at the University of Minnesota
E-Mail: jandersn@soils.umn.edu

Cc: TJOYA@intranet.reeusda.gov
tstrickland@reeusda.gov
mhorton@reeusda.gov
mrozum@reeusda.gov
Norland.1@osu.edu
Ccasey@extension.umn.edu
dflynn@extension.umn.edu
gmiller@extension.umn.edu
phill@puccini.cdl.umn.edu
hcheng@soils.umn.edu
Charles C Muscoplat
gwjackso@facstaff.wisc.edu
smolen@okstate.edu
jandersn@soils.umn.edu
Tracy M Thomas

Enclosed as a Word97 attachment is a letter addressed to Terri Joya commenting on the development of rules for integrated water quality programming in CSREES under Section 406. An original and three copies have been sent to Ms. Joya. If you would like to discuss this further with me, please let me know.

Jim

****
December 16, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES
Stop 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

Dear Ms. Joya:

This letter comments on the proposed Cooperative State Research, Education, and Extension Service

(CSREES) integration of water quality programs under the Section 406 authority. I would like to state that I wholeheartedly support the effort to provide program integration within research, education, and extension. It is something that we have tried to accomplish at the state level with the establishment and operation of the Water Resources Center at the University of Minnesota. We combined under one entity the research components of the Minnesota Agricultural Experiment Station within the College of Agricultural, Food, and Environmental Sciences; the Water Resources Research Institute in partnership with the US Geological Survey and the College of Natural Resources; the Water Resources Graduate Education Program; and the University of Minnesota Extension Water Quality Program.

I also support the recommendations that were made by Eric Norland on behalf of the Extension Water Quality Coordinators. The coordinators recommend that:

- The goals of the Extension Water Quality Strategic Plan be adopted as guidance for Section 406;
- Integration be applied to the overall program without requiring three-way integration for each program;
- Research be limited to applied research that is carefully targeted to support the goals of the strategic plan;
- Review panels be balanced to include Extension and education professionals;
- Under-served, minority-audience programs be maintained; and
- Emergency-response capability be maintained.

In addition, I will provide some specific comments and observations about how an integrated program might evolve from the current programs. The main issue, as I see it, is what do we hope to accomplish by moving to an integrated competitive program, and how do we get there?

The major goal is to implement a water quality program that ties closer together the research, education, and Extension activities of the land grant system to address national, regional, and state water quality issues across political boundaries (i.e., able to function at watershed or basin scales). In addition, we want to have a program that is rooted in the development of partnerships with other agencies and citizens, so their problems and needs are also addressed. Lastly, we want some built-in flexibility to direct resources to emerging issues in a timely fashion.

To a large extent, the draft plan, "Cooperative State Research, Education, and Extension Service Water Quality Program Structural Proposal," authored by Tim Strickland, would result in this type of program. However, with all of the water quality funds directed into Section 406, the parts of the structure funded in the draft with Smith-Lever 3(d) funds will have to be funded in another manner. Assuming that it is still desirable to provide flexibility (Item l in the draft) and support regional integration (Item 2 in the draft), I offer the following suggestions.

In the conference committee report on page 47 it says, "Water quality—The committee expects a continuation of funding at current levels for the Agricultural Systems for Environmental Quality Program and the Management Systems Evaluation Area Program. The Committee continues funding for the Farm*A*Syst program at no less than fiscal year 1999 level." I suggest that we use the existing structure and expertise to implement the first two items in the April 1999 draft. A portion of the funding should be set aside equal to or greater than the 1999 funding levels, and the current projects and activities should be given the opportunity to submit proposals to establish regional partnerships for implementation of the seven goals set forth in the water quality strategic plan. These national and regional programs already have considerable experience working in partnership with other agencies and working with stakeholders to identify priority needs for research and education. Give them the responsibility to construct a program within their region that creates partnerships, matches effort and funding from other agencies and groups, and addresses water

quality issues at the appropriate scales. This type of arrangement has already been implemented in a number of states. In the North Central States, we have leveraged two to ten times the current federal funding for water quality programs. If CSREES gives the LGU the responsibility, we can create a program that is competitive, coordinated with agencies, and addresses regional and national issues.

Another portion of the funding can be directed specifically toward a watershed approach to solving problems, as put forward in the April 13, 1999 draft. It is not enough, however, to send out an RFP that calls for integration of research, education, and extension to solve watershed-scale problems. The likely result of such a call would be a dissatisfying collection of projects that might not get at the nation's water quality needs as effectively as earlier programs. The RFP should require a specified need, identified by the watershed stakeholders, and applied research focused on addressing the questions raised by that need. The extension and education pieces should target appropriate audiences, identify needs, implement programs, and conduct evaluations to track any practice changes that may result. The RFP should require clear evidence that the research is done by those with research capability, the extension by extension professionals, and the education by educators. As a review panel member, I have observed that RFPs that require this type of approach prompt proposals that are strong either in research or education, but have little or no integration of function. Having panels made up predominantly of researchers without on-the ground field experience in education and extension will not encourage the integration, it will merely widen the gap between the research function and the people it is ultimately supposed to help. As a part of the regional focus, Experiment station and Extension deans and directors should institute joint research and extension panels to help in this review process.

Regional centers should be supported with a portion of the funding. The RFP for the regional centers should specify that the centers serve to link LGUs and establish partnerships with other appropriate agencies and organizations. Rather than focusing on liaison positions with specific agencies, require the coordinating institutions to interact programmatically with the appropriate agencies and all of the LGUs in the region.

I hope these comments are helpful as we move forward to develop a sound integrated water quality program for the future. I will gladly assist in any way that I can with the establishment and implementation of this program. If you have any questions, feel free to contact me.

Sincerely,

/s/
James L. Anderson
Director

Name: Barbara P. Glenn, Chair
Organization Representing: Coalition on Funding Ag Research Missions (CoFARM)
E-Mail: bglenn@faseb.org

The Coalition on Funding Ag Research Missions (CoFARM), which I chair, is considering providing written comment on the issue of the organization and implementation of the Section 406 account. Deadline is December 17 according to the Federal Register.

As we are a coalition of 20 scientific societies it takes time to achieve consensus on a topic of this nature. We are having difficulty completing our comments by this date. Can you advise whether we can submit by December 30? As a federal agency, I believe that we can submit comments to you at any time. I would appreciate your comment.

Regards,

Barbara Glenn

Name: Richard Castelnuovo
Organization Representing: Farm*A*SystHome*A*Syst, 8142 Steenbock Library, 550 Babcock Drive, Madison, Wisconsin 53706
New Address: 303 Hiram Smith Hall, 1545 Observatory Drive, Madison, Wisconsin 53706
Telephone: (608) 265-3727
Fax: (608) 265-2775
E-Mail: rcasteln@facstaff.wisc.edu
Web Address: http://www.wisc.edu/farmasyst

RE: Comments in connection with the Section 406 stakeholders meeting

Dear Ms. Joya:

I appreciate the opportunity to submit comments concerning the implementation of the Integrated Research, Education and Extension Competitive Grants Program, more specifically known as Section 406 of Agriculture Research, Education and Extension Reform Act of 1998 (AREERA). My comments are directed toward the implementation of Farm*A*Syst as part of the water quality national initiative.

The fiscal year (FY) 2000 Agriculture Appropriation shifts CSREES Water Quality Funding, including funding for the Farm*A*Syst/Home*A*Syst program, to Section 406, a new integrated account. Report language connected with Section 406 plainly establishes the intent to maintain or expand CSREES water quality funds made available for the national Farm*A*Syst/Home*A*Syst program. In FY 1999, CSREES provided $1.11 million to support the national program. At a minimum, CSREES in its administrative rule making should make these funds available to support the national Farm*A*Syst framework by insuring adequate funds for national coordination and state implementation.

Support to sustain the national Farm*A*Syst/Home*A*Syst framework is based on this directive from Congress: "Within the funds made available for water quality, the conferees expect that no less than the FY 1999 levels of funding will be provided for the Farm*A*Syst/Home*A*Syst program." Continued support for the program framework is consistent CSREES policies and practices. In the last decade, CSREES has been one of the key contributors in building the national capacity of Farm*A*Syst/Home*A*Syst, a program that Colien Hefferan, then Acting Administrator, CSREES, recently described as "a cutting-edge example of effective programming--translating technical research information into easily understood, hands-on education that empowers private citizens to take actions that prevent pollution" and an Extension model in building "partnerships among local, state and federal agencies and the private sector."

For eight years, CSREES has been one of the partners along with NRCS and U.S. EPA in supporting national Farm*A*Syst/Home*A*Syst program activities (e.g. coordination, materials development, and innovative programming). These national functions have been critical to the growth and maintenance of a 50 state network with local program that have proven effective in protecting private wells, safeguarding community drinking water sources and reducing nonpoint source pollution. The importance of maintaining or increasing support for Farm*A*Syst/Home*A*Syst was recognized in the CSREES Water Quality Strategic Plan (Education, Empowerment, and Involvement: Safe Rural Drinking Water and Minimizing Agricultural Pollution: Strategic Directions for the Water Quality Education Program: FY 1998 and Beyond).

The National Advisory/Leadership Team (NALT), which was established to coordinate activities related to the Strategic Plan, recommended that more than $1.2 million dollars be provided by CSREES to support Farm*A*Syst/Home*A*Syst activities.

Since 1989, CSREES has supported state Farm*A*Sys/Home*A*Syst implementation in part through base

support for state water quality programs. Competitive grants also have supported Farm*A*Syst/Home*A*Syst activities. In 1998, state programs received 10 of 17 grant awards from a total of $678,000 in water quality education funds to help under-served communities make informed decisions about their water resources. For FY 1999, Congress increased the Extension Water Quality budget by $500,000 to provide a continuing competitive funding mechanism to support state programs in their efforts to use Farm*A*Syst and Home*A*Syst to address state and local priorities such as livestock waste and nutrient management. The soundness of this investment was reinforced by a July 1999 GAO report Agriculture Waste Management Practices (Letter Report, 07/01/1999, GAO/RCED-99-205) which prominently highlighted Farm*A*Syst/Home*A*Syst as a vital national initiative to address this concern. It is this national framework and capacity that Congress elected to invest in when it began setting aside funds for Farm*A*Syst/Home*A*Syst in FY 1999.

Specific Actions Requested

1. Develop administrative rules that implement the intent of Congress to maintain and expand the funds available for a national Farm*A*Syst/Home*A*Syst program in FY 2000. In FY 1999, $1,110,000 in water quality funds was made available to Farm*A*Syst/Home*A*Syst in three areas: $500,000 in competitive grants for state programs, $211,000 support for national program development and coordination, and $400,000 in state water quality program funds used for Farm*A*Syst/Home*A*Syst activities. This is the minimum amount necessary to maintain the Farm*A*Syst/Home*A*Syst network of state interagency programs coordinated by a national office.

2. Use authority conferred by Congress to increase funding for Farm*A*Syst/Home*A*Syst. Additional support for Farm*A*Syst/Home*A*Syst would build capacity to address national issues such as animal waste management, nonpoint source pollution, drinking water protection, family health with a special focus on children's health, and food safety. It would expand the research component of the program, a key focus of the integrated activities account. It would build on partnerships with the private sector where Farm*A*Syst is being used by industry as a model to develop voluntary, commodity-specific environmental management systems.

3. Develop administrative rules that allow for all Farm*A*Syst/Home*A*Syst funds to be administered through a single grant recipient. That recipient will maintain the national program capacity by coordinating competitively funded state projects and by providing national program development, coordination and evaluation.

Thank you for your kind consideration. I would kindly appreciate your acknowledgment of receipt of these comments.

Very truly yours,

Richard Castelnuovo
Government Affairs Coordinator
National Farm*A*Syst/Home*A*Syst Programs

Name: Dr. O. Norman Nesheim, Professor & Southern Region PIAP Coordinator
Organization Representing: Pesticide Information Office, Building 847, Box 110710, University of Florida, Gainesville, Florida 32611-0710

Comments on Section 406 related to the Pesticide Impact Assessment Program (PIAP)

Thank you for the opportunity to make comments on Section 406 related to the Pesticide Impact Assessment Program.

My Name is Norman Nesheim. I am the Florida State Liaison Representative and the Southern Region Coordinator for the Pesticide Impact Assessment Program.

I will make a few comments on the Pesticide Impact Assessment Program and Section 406.

The primary objective of the Department of Agriculture (USDA) Pesticide Impact Assessment Program has been to provide the most objective and accurate data available for defining and evaluating benefits and risks of selected pesticides with critical agricultural uses. Inherent in this objective is the provision for a single, uniform approach to obtain data from the agricultural system (which refers to the various USDA agencies and the agricultural experiment stations and extension services of the Land Grant University system.) Although this objective for the Pesticide Impact Assessment Program (PIAP) was written 23 years ago when the program was established, it is interesting to note that the issues that led to its development then are very similar to the ones we are dealing with today in the implementation of the Food Quality Protection Act and the reregistration process for pesticides. There is still a need for objective and accurate information on pesticide use and pest management practices to be able to define, evaluate and mitigate dietary, occupational and environmental risks for selected pesticides.

One of the principal reasons for establishing the PIAP was to create a coordinated approach to obtain information from the agricultural system. Until PIAP was created, efforts to obtain needed information were uncoordinated and ineffective. One of the strong points of PIAP was the establishment of a single point of contact in each state. In view of that I strongly recommend that the RFP for the competitive grants program under Section 406 be developed in such a way that fragmentation of the program can be prevented. We don't want to return to the situation that existed before PIAP was established. The RFP should require that there be a single point of contact in a state for the coordination of all FQPA and pesticide related information requests and prevent multiple requesters from a state from dividing the funds so that no single person can coordinate the program within a state.

PIAP has played an important role for states in dealing with pesticide issues related to EPA risk assessments for pesticides used on crops or other sites in the state . These issues frequently occur without predictability and the EPA or USDA staff making requests for state specific information often need a quick response. Program stability plays an important role for states to effectively respond to such requests. The previous mechanism of allocating funding to states based on an algorithm permitted the development of stable state programs and the ability to attract and retain program staff and to develop information resources to respond to such requests. In the development of the RFP for implementation of PIAP through Section 406 funding strong consideration needs to be given to the funding of multi-year proposals to encourage the development of stable PIAP programs and to be able to attract and retain staff.

The state outreach component of PIAP should not be overlooked in developing the RFP. In addition to providing information to USDA and EPA, the program has provided a link to growers, state commodity organizations, research and extension faculty, and others in the states. These state linkages are beneficial when state specific information is needed on pesticide use and pest management practices for FQPA or pesticide reregistration issues. A state outreach component should be included in the RFP.

The PLAP program has been in existence for 23 years. Many states have experienced staffs who are paid with PIAP funds. States received their FY 1999 funds in January 1999. Due to the new mechanism of funding PIAP, states who successfully compete for these funds will probably not receive them until August or September 2000. I strongly encourage that the RFP for this program be developed as soon as possible so that successful states can retain their experienced PIAP staff.

An RFP was used in the call for the state allocation proposals under the previous procedures used to allocate PIAP funds prior to the competitive grants process established by Sec. 406. In developing the RFP for the competitive grants process, strong consideration should be given to inclusion of the bulleted areas of emphasis that were to be addressed in state programs.

Section 406 permits an indirect cost rate of 19% for the funds. Indirect cost was not permitted by the previous funding authority for the program. Some states have asked for a multi year phase in for this indirect cost to reduce the immediate impact of the full rate.

That concludes my comments. Thank you for this opportunity.

Name: June Henton
Organization Representing: Board on Human Sciences

Public Comment
by
June Henton
Board on Human Sciences
Representative to the Board on Agriculture
FY 2001 Budget Committee
National Association of State Universities and Land Grant Colleges
to
Cooperative State Research, Education and Extension Service
USDA
on the
Implementation of Section 406
Agricultural Research, Extension, and Education Act of 1998
December 2, 1999
Washington, DC

We appreciate the opportunity to comment on the Integrated Research, Education, and Extension Competitive Grants program made available via Section 406 of the Agricultural Research, Extension and Education Act of 1998. On behalf of the Association of Administrators of Human Sciences/Board on Human Sciences, I wish to address, specifically, the Food Safety component of this competitive grants program and the delegation of authority for its management. Human sciences units within the Land Grant University offer research, academic (undergraduate through doctoral) degree and extension/outreach education programs from an integrated or systems perspective, understanding that the most effective solutions to human needs require linkage between discovery and dissemination of information. This integrated competitive grants program offers a very important opportunity to find solutions to some targeted issues important to people and to the agricultural enterprise.

FOOD SAFETY
Foodborne illness remains prevalent throughout the United States, in significant part because food handlers, preparers, and consumers are not fully informed of risks or committed to safe food handling practices. The public has become increasingly sensitive to food safety issues with highly publicized reports of foodborne illnesses, but in too many cases segments of the public are not aware of ways in which illnesses can be prevented.

Today approximately half of food expenditures are for meals eaten away from home. Vulnerable populations such as children and the elderly have increasing responsibility for acquiring and preparing their own food or are served meals in congregate feeding sites such as day care centers or homes for the elderly. Further, ready-to-eat food is widely available at a range of retail establishments. The increasing diversity of the American population is also increasing the diversity of foods eaten and approaches to food handling. It is no longer reasonable to base food handling guidelines, management practices, policy or education on a monolithic view of the food handler and consumer.

Numerous reports describe what consumers, in general, can do to improve food safety in their own households, yet, little information exists identifying the method and frequency at which specific food handling practices are performed in a less-than-safe manner. While a great deal of research has been done on handling practices in production, manufacturing, processing, and distribution of food stuffs; information regarding the range of consumer and food handling practices has been almost non-existent.

To prevent the further spread of foodborne illness, there is a need to target and change unsafe food handling practices all along the food chain. A specific goal of the research phase would be to document food-handling practices of retailers, food service workers, and various segments of the consuming public as a scientific basis for regulatory policy and effective education programming. A specific goal of the education phase would be to develop audience specific research-based education programs, teach and evaluate them to affect positive behavioral change.

Success of such an integrated research/education program can be expected to:

- Significantly reduce foodborne illness, especially among vulnerable populations
- Significantly improve the quality and effectiveness of food safety education
- Better target food safety education programs for effectiveness among specific populations and efficiency in administration
- Provide small business food processing and handling operations access to science-based food safety procedures
- Provide a scientific base for food safety policy development

MANAGEMENT OF THE 406 COMPETITIVE GRANT PROGRAM

Success of a program such as outlined above requires an integrated approach to problem solving as provided in the Section 406 Authority of AREERA. Affecting human behavioral change toward activities such as safe food handling requires documentation of actual practice within specific population contexts and cultures, message or rules testing based on documentation, followed by a series of refinements of documentation and message testing until changes in behavior can be adopted and sustained. It requires continuous interaction between researcher and educator. Early identification of populations in need (small business operations, childcare centers, homes for the elderly, etc.) are readily identified by extension educators, who are also skillful in tailoring education to targeted audiences.

Integrated problem solving and behavioral research methodology differ from the type of basic research approaches currently managed under the NRI program. Further, current definitions of scientific merit used in this program are not appropriate for such an integrated problem solving program.

We recommend that Integrated Research, Education, and Extension Competitive Grants program under Section 406 of AREERA by managed centrally under CSREES authority, that the program be directed by a manager with administrative experience in research education and extension integrated problem solving in the subject matter areas identified in the program (might be an administrator drawn from the Land Grant University system), that panel reviewers be representative of the integrated nature of the program, that the manager have sufficient staff to get grants awarded within an accelerated time frame.

Name: Daniel Godfrey, Chair
Organization Representing: National Association of State Universities and Land-Grant Colleges (NASULGC), Extension Committee on Organization and Policy, 1307 New York Avenue, NW, Suite 400,

Washington, DC 20005-4722
Telephone: (202) 478-6040
Fax: (202) 478-6046
E-Mail: www@nasulgc.org

Public Comments
To
Cooperative State Research, Education and Extension Service
United States Department of Agriculture
On
Implementation of the Integrated
Research, Extension, and Education Competitive Grants Program
By
Daniel D. Godfrey, Chair
Extension Committee on Organization and Policy
National Association of State Universities and Land-Grant Colleges
December 2, 1999
Washington, DC

Thank you for the opportunity to officially comment on the implementation of the Integrated Research, Extension, and Education Competitive Grants Program, more specifically known as Section 406 of Agriculture Research, Extension, and Education Reform Act of 1998 (AREERA). The comments I offer today are done so as Chair of the Extension Committee on Organization and Policy (ECOP) of the National Association of State Universities and Land-Grant Colleges (NASULGC) which represents the 75 Land-Grant University Cooperative Extension Services in our nation wide Extension System. I am also the Dean of Agriculture at North Carolina A & T State University and the Administrator of the Cooperative Extension Service and Agriculture Experiment Station.

The Section 406 authority was quite well known by our State Extension Services administrators from the time it was considered for inclusion in AREERA. The concept and intent of the Section 406 was generally accepted by the State Extension Services. However, these same people and others in the Extension System have three major concerns.

First, when the basis for funding the account appeared in the fiscal year 2000 Executive Budget, the State Extension Services at the administrative and program levels expressed significant concern. The primary concern was the movement of existing 3(d) program funds for three high priority programs into this account. Food Safety, Water Quality and Pesticide Impact Assessment are not minor programs in the Extension System; quite the contrary. The main concern is that a significant amount of these 3d program funds were long time monies that are currently being used for faculty salaries and operating expenses for those providing the specialized leadership and continuity for these programs. It is these faculty that would have provided leadership for an expanded program in these areas with the additional funds that Congress appropriated to this account. In too many situations, these faculty will or are being terminated because the long-standing funding source for these very high priority programs is now uncertain. This will be a difficult transition year for these three programs and for the faculty who have provided the leadership for these programs over the last several years. We respectively ask the CSREES to use every possible option available to help the State Extension Services through this transition year to minimize any unnecessary program gaps because the lead time to make fiscal and faculty adjustments is not available.

The second significant concern that we offer comments is the manner in which the Section 406-account fund is administered. There are two aspects of this matter. One is the time frame from when CSREES has access to these funds and the awarding of these funds to those who are successful in the competitive grant process. It is imperative that this time frame be something considerably less than 12 months. We recommend this time frame be no more than 4-6 months. Operating with year to year funding for

educational programs is tenuous enough in terms of quality programming and faculty retention without adding the burden of learning toward the end of the year that you may or may not have the needed funding.

The other important aspect of administering this fund is how grant proposals are reviewed. Very specifically we recommend a merit review process, as defined in the AREERA, rather than the peer review process. The latter has a long track record of being very time consuming. Initiating a new merit review process is an opportunity to streamline the decision-making and to assure not only quality of programs, but also stress relevance to the real world issues. After all, relevance appears to be one of the intents of Section 406. We stand ready to provide advice, guidance and faculty support in your deliberations on the merit review process design and subsequent implementation.

The merit review process will allow states to use local input, rather than all guidelines coming from the federal level. Many water quality issues are regional in nature and are not necessarily national in nature, though some such as the "Hypoxia" issue do involve between 20 and 37 states, depending on how many states one considers to be in this water shed.

Lastly, we recommend the funding allocation process be managed by the CSREES either by a specific unit for this purpose or by the agency's relevant program units. We are not supportive of the Section 406 account being administered in the same unit that administers the National Research Initiative (NRI). Our reason is that the purpose of the Section 406 funds is so different than those currently administered under the NRI, which is primarily basic/fundamental research. Section 406 funds are intended for more action - focused research and education. Establishing a streamlined, action focused review process could serve as a hallmark of state/federal partnership review process that would involve both entities of the partnership to the fullest extent permissible under current laws and regulations. A process that best serves the agency, the state partners, and most importantly, the public, is very important because it is likely more and more federal funding appropriated to CSREES to administer will be in the competitive grants mode. It is for these reasons, we would discourage the CSREES from administering these funds on a regional basis or some variation thereof. Why have several entities that will need duplication of merit review systems and fiscal accounting? One well managed review system with maximum involvement of the partnership seems most efficient and effective, and can accomplish the intentions of Section 406, namely integration, multi-state, multi-institutional, and an interdisciplinary focus on the significant national, state and local issues. The manner in which the competitive portion of the Water Quality monies for Extension has been administered for nearly a decade is a prime example of this recommendation working very well.

We appreciate this opportunity to present our general thought and specific recommendations on the implementation of Section 406. The State Extension Services stand ready to assist in the successful implementation of this budget authority.

Name: Thomas A. Fretz, Dean
Organization Representing: College on Agriculture and Natural Resources, University of Maryland, 1106 Symons Hall, College Park, MD 20742-5565
Telephone: (301) 405-2072
Fax: (301) 314-9146

PUBLIC COMMENTS
by
Thomas A. Fretz, Dean
College of Agriculture and Natural Resources,
Director, Maryland Cooperative Extension Service, and
Director, Maryland Agricultural Experiment Station
University of Maryland
to the U.S. Department of Agriculture

Cooperative State Research, Education, and Extension Service (CSREES)
on the Implementation of Section 406
of The Agricultural Research, Extension and Education Act of 1998
(1998 AREERA)
December 2, 1999
Washington, DC

I am Thomas A. Fretz, Dean of the College of Agriculture and Natural Resources at the University of Maryland, Director of the Maryland Cooperative Extension Service, and Director of the Maryland Agricultural Experiment Station. Thus, my responsibilities extend to the three primary functions of a contemporary Land-Grant University - teaching, research, and extension.

I am also the current Chair of the National Association of State Universities and Land-Grant Colleges' (NASULGC) Board on Agriculture. However, I am here today not as a representative of the Board on Agriculture, but rather as an administrator of state-based programs intended to serve the needs of my institution's broad constituency.

I appreciate the opportunity to provide comments to you on the implementation of Section 406 of the 1998 Agricultural Research, Extension, and Education Reform Act**,** sometimes referred to as AREERA. I have given this matter much thought, and would like to share with you some views on Section 406, and recommend a process which I believe could have significant impacts on our ability to address critical issues facing the agricultural community.

I see two possible and fundamental options for implementing Section 406, each with variations. These two options are:

1. a centrally organized initiative, or
2. a distributive program with your partner institutions.

It is the latter that I believe will have the greatest impacts on our partnership, bringing to the table new stakeholders and allowing us to address issues at a local level.

Centralized organization may have appeal to some, especially those interested in investing in the discoveries of fundamental science, as we now do so extraordinarily well through the National Research Initiative - Competitive Grants Program**.** Basic scientific research is important to us all, but I believe that this was not the intention of Congress in creating the Section 406 authority. I believe Congress was clear in its intent that this new authority be targeted for problem-solving in a functionally integrated set of activities. I see a need to carefully consider the opportunities for more directly working with your institutional partners in the identification of stakeholder needs, setting program priorities, and tracking the benefits that are to be derived from these investments. In my view, a distributed partnership approach would be the most effective way to accomplish that goal.

I base my conclusion on the highly successful regional approach to integrated activities that have been conducted for many years within the Integrated Pest Management (IPM) and Sustainable Agriculture (SARE) activities. Both of these regional activities are true federal-state partnerships that operate a competitive grants program. Programmatic priorities are locally and regionally meaningful. Project activities are responsive to stakeholder needs. These programs are well integrated and function across extension and research. These multi-state collaborations are strongly supported, and most importantly, they are highly valued.

Certainly, the existing regional competitive grants model are not directly applicable to the implementation of Section 406. But there is much to be learned from this two-decade experience with success. How we might learn from these experiences should be discussed in a "think tank" activity that should include our regional stakeholders. We need to extract the best practices from the IPM and SARE activities for

adaptation to this new funding authority. We should do this as soon as possible so we can begin to define the broad areas we should be addressing through our requests for proposals, and set out the procedures we need to attain success. The funding has been appropriated, and we now need to get organized so that we will not lose a full year of critical research, outreach and instruction within these integrated activities as outlined by Congress.

How might the program be organized? I am proposing that we are already organized to regionally manage our research, extension, and instructional activities through our regional associations of deans and directors. We have in place formally approved functionally integrated activities that are open to participation by federal and state agencies, private institutions and international specialists as well. Additions to our existing portfolios could easily accommodate the needs we have for stakeholder input, priority setting, technical assessments, planning for integrated collaborations, and project impact assessments. Modest staffing requirements could be met through existing funding provisions that permit program dollars to be used to manage the program. In addition to peer review panel costs, funding might be used to support regionally organized stakeholder listening activities, and formal impact assessments of the funded projects. A lead office could be designated within each region to coordinate regional activities, much as it is now done in the Western region for their integrated multi-state research and extension projects.

Several of my colleagues have asked me about the need to identify and distinguish regional priorities. Can't we simply do this centrally? I think not, given the following examples.

Our functionally integrated Northeast regional project in food safety has identified four priorities in need of integrated research, extension and teaching attention. Our technical specialists see the overwhelming need to address the implementation of the federal Hazard Analysis Critical Control Point or HACCP implementation for small enterprises in four areas: fruit juice production, especially E. *cold* in apple cider; processed meats; seafood and shellfish; and food handlers. Obviously these Northeast priorities would not f~t the needs of other regions. Similarly, for water quality we must address the teaching, extension, and research needs of several major watersheds, such as the Chesapeake Bay, where *Pfesteria* continues to be an issue with much of the concern directed and suggested blame directed at inputs from the regional agricultural sector. Additionally, the alleged causes of our water quality problems are unlike anything faced in the other regions. In a different area, our pesticide impacts problems are also differ from the other regions, with major concerns from home and golf course turf, and household pest control abuses.

I would like to suggest that you consider the following recommendations, as you plan the implementation of Section 406.

1. I am recommending the organization and management of Section 406 by regions, although some consideration might be given to a multi-regional program. For example, all of the food safety grants panels might be supported by one regional office, as a set of services for the regional competitions? This would seem to be most efficient use of staff support.

2. Funds should be allocated to the regions by a formula that reflects purposes of the Section 406 program.

3. Size of grants awarded need to be larger that in past practices, if the intention is to encourage functionally integrated activities, especially if more than one institution is to participate.

4. Institutional eligibility will be important, and *ad hoc* 'extension' activities by extracurricular bidders must be guarded against. We do not need to build another extension system, but rather we need to bring more partners from other sectors into extension. Moreover, pledges to integrate and collaborate will need some form of assurance that goes beyond simple statements of promise.

5. The processes used to call for proposals, evaluate proposals, and monitor awards needs to be re-

engineered, if the partnership is to gain efficiencies. Paperless management of grant proposals, virtual panel meetings, and more effective methods for accountability must be employed. Use of the ADEC electronic model for grants submission and evaluation that was designed and implemented last year should be investigated and used as appropriate.

6. I strongly suggest that whatever the process, please use pre-proposals to screen for the most relevant proposals. You must be aware that the cost to our institutions, of faculty time writing full proposals for inadequately funded federal competitive grants programs, costs us millions each year. Many of those unfunded proposals are admittedly very highly rated by the peer panels.

7. I highly recommend you design the Section 406 process to allow partnering with other agencies (e.g., FDA, EPA, NASA). We have first hand knowledge of the interest by many federal agencies in matching USDA funding in specific areas. Much of this interest is in gaining access to our extension and outreach networks in areas of mutual interest. I see opportunities to leverage the Section 406 funding several fold, but astute strategies are needed.

8. I strongly recommend that processes be created to permit electronic submissions of grant proposals.

9. I propose that strong consideration be given to requiring matching funding for each proposal submitted. You need not require a "1 to 1" matching, but some degree of financial interest should be committed by other interest groups, ea., commodity, private and public sector.

10. I propose that the process used for announcing the request for proposals, or RFP, be delegated to the regions, with the use of Federal Register notification only as required by law. Our scientists do not read the Federal Register daily, and the missed opportunities from poorly communicated intentions must be replaced with a more open form of contact. The use of listserves, frequently up-dated home pages, professional society newsletters and similar common forms of communication are better services to those who would be interested in applying for a grant.

11. I would like to suggest that the 1890 institutions be fully integrated into the process and that some minimum levels be set for their participation. While this might not be achievable, an alternative is to treat the 1890's as a fifth region (that is equal treatment), just as we in the university community are already doing.

I believe that a regionally organized competitive grants program for Section 406 would yield the following benefits:

- Lower administrative costs, all things considered, including the cost of lost opportunities;
- A vastly improved stakeholder input to the priority setting process;
- A much greater focus on regional and local needs, on topics important to the intended users;
- A much shortened turn-around time in the grant award processes;
- Greatly improved programs successes, by bringing the grants management process into the information technology revolution; and,
- True functional integration. It can be accomplished.

And inasmuch as this last point was, presumable, the primary intent of Congress in creating the Section 406 authority, I hope that this point will remain central to you in your implementation decisions.

I appreciate the opportunity to share these thoughts with you. Should you have any questions, I would be most pleased to try to respond.

Thomas A. Fretz
Dean and Director

Name: David MacKenzie
Organization Representing: Chair of the Experiment Station Committee on Organization and Policy (ESCOP)

PUBLIC COMMENTS
on the
Implementation of Section 406 of the
The Agricultural Research, Extension and Education Act
of 1998
(1998 AREER\)
by David R. MacKenziei
Representing
the Chair of the
Experiment Station Committee on
Organization and Policy
(ESCOP)
of the
National Association of State Universities and Land-Grant Colleges
(NASULGC)
to the
Cooperative State Research, Education, and Extension Service (CSREES)
U.S. Department of Agriculture

Room 107A Jamie L. Whitten Federal Building
United States Department of Agriculture
12th and Jefferson Drive, SW
Washington, DC

December 2, 1999

I am representing today the Chair of the Experiment Station Committee on Organization and Policy, or ESCOP, of the National Association of State Universities and Land-Grant Colleges. ESCOP Chair Richard Jones of the University of Florida was unable to attend today, and his Vice Chair, Southern Regional Executive Director Tom Helms, was also unable to attend. My name is David MacKenzie. I am Executive Director for the Northeastern Regional Association of State Agricultural Experiment Station Directors, and a member of the ESCOP Chair's Advisory Committee.

My comments today should not be taken as a general consensus within our community. In fact, there are notable disagreements within our research community regarding the best approach to the implementation of Section 406 of the Agricultural Research, Extension and Education Reform Act of 1998. However, we all have a strong desire to align our comments with those of our functional counterpart, Cooperative Extension. Some of us would simply defer to the national extension leaders, and avoid unseemly divisions. Others see a need to build on our successes, and learn from our experiences, even though that takes us in a direction different from our extension counterparts. Thus, we have a disagreement over how best to proceed. But,

before I get to that disagreement, let me share with you a vision.

The State Agricultural Experiment Station community, or the SAKS, foresees the further fulfillment of the Land-Grant University (LOU) paradigm of integrated research, teaching and extension activities through new and expanded partnerships with the U.S. Federal government. The SAKS Directors are funding an innovative experiment in partnership-building called SUNEI, from whom you have heard comments on Section 406. We see SUNEI as a concerted effort, in partnership with CSREES, to build bridges to other Federal agencies that share our agenda on agricultural and environmental issues. We have received a warm welcome from these contacts, and we are looking forward to building interest in working together.

The LGU-CSREES partnership's unparalleled success this century no doubt serves as a model for others to follow. But, as well, we need to look at our partnership's strengths, and to learn from that experience about how we can do better. The message from Congress in the 1998 AREERA was clearly, *inter alia,* more stakeholder listening, more multi-state collaboration, more integrating activities, and more accountability. We need to consider these points in the implementation of any new federally funded programs. Given our institutional interests, experiences, and the understood messages from Congress, how might the Section 406 competitive grants program be implemented?

There will be a need for a mechanism to assure that stakeholder needs are addressed through listening sessions and transparent priority setting exercises. There will be a need to assure the quality and relevance of proposed activities through peer and merit reviews of proposals. There will be a need to facilitate multi-institutional activities. There will also be a need to integrate our functional activities. And, there will be a need to provide adequate accounting for the promised deliverables.

How might this be best done in a partnership?

As a former employee of the Agency I feel confident in mentioning that the funding available for managing a competitive grants program within CSREES is inadequate. Additionally, staffing caps and location costs work against internalizing the entire grants management process. Moreover, the Agency's current policy against pooling grant funding with partner Federal agencies (which is understood to be based on an interpretation by the USDA's Office of the Inspector General) significantly limits any strategy for leveraging Section 406 appropriations.

We propose a partnership approach to the management of Section 406 that builds on the comparative advantages of our component institutions. We are proposing a regional approach that:

- Allows greater focus on regional stakeholder needs;
- Avoids conflicts of interest in the review process by drawing talent from outside the region;
- Permits multi-institutional, integrated activity-collaborations to form; and,
- Gives strong support to impact assessment of the outputs and outcomes from current and past investments.

We see the regional Integrated Pest Management program, or IPM, and the Sustainable Agriculture Research and Education program, or SARE, as the most appropriate examples from which we can draw experience. Both programs manage a competitive grant program that is functionally integrated, multi-institutional, and a model of accountability.

We see great opportunity to seek matching funding from other Federal and state agencies, and from the private sector. Previous discussions with EPA, NASA, and FDA have led us to conclude that great interest exists in such a strategy, if done as a partnership and with joint funding. We believe that the funding made available through Section 406 could be more than doubled through matching funds.

But we are not harmonious with our national extension counterparts on the point of centralization *versus* regionalization of Section 406. We agree with our extension counterparts that Section 406 should not be

administered in the same unit that administers the National Research Initiative (NRI). But we do not agree that CSREES should be discouraged "from administering these funds on a regional basis, or some variation thereof"'. We are proud or our shared successes in regional IPM and SARE. We believe that regionalized management of Section 406 is the best of all choices.

We are endorsing the requirement that the Section 406 grants be awarded competitively, based on reviews of proposals for scientific quality, and relevance to stated priorities. ESCOP has long supported the use of peer review as a device for selecting the most appropriate proposals. Moreover, our interest in partnering with additional federal agencies will require that high standards be used for the selection of the best proposals.

We are not proposing the distribution of the Section 406 monies to the regions, only a regionally organized partnership for deciding priorities, managing the reviews, and providing accountability. CSREES would retain all fiscal and audit control, while gaining access to the partner-institutions' resources and support staff.

In the normal organization of a competitive grants program, review panels are matched to portions of the available funding. We are proposing that instead of dividing food safety or water quality into arbitrary national categories, that each region be given a voice in the stakeholder listening, priority setting and planning processes. The Northeast region has already begun to identify its food safety priorities. You will hear from others today that they know these regional needs are different from the other regions. We are proposing to you a program of responsive activities organized in ways not possible through national priority setting. We are proposing integrated activities too difficult to achieve nationally. We are proposing multi-state activities unlike anything heretofore experienced. We are envisioning degrees of multi-institutional accountability never before seen.

I ask....Can CSREES hope to implement a multi-million dollar grants program without the Partnership's participation and support? While NSF administers its competitive grant programs for 7% of its appropriation, CSREES gets but 4% for administration. While NSF might complain that 7% is not enough to do a good job, CSREES struggles to make ends meet. Is 4 % for competitive grant administration realistic? Obviously it is not.

We are proposing that our successful experiences in competitive grant management should be applied to the questions of Section 406 implementation. Our Partnership needs to build on our success, and not try to reinvent success at every opportunity.

We believe that our differences with our extension counterparts are minor, and resolvable. We see these differences as primarily choices for management-cost containment, and not on programmatic substance. We also agree on the need to manage these funds wisely, and to be fully accountable. But, our experience with regional programs has served us well, and we would be remiss in not noting the success that we have had, and the value that experience brings to this set of program management questions.

And, please let us note for the record that, in the end, no matter what is decided for the implementation of Section 406, we will most willingly integrate our activities with Cooperative Extension, for that is our institutional paradigm.

Thank you for this opportunity to comment for the record.

Name: Ferd Hoefner
Organization Representing: Sustainable Agriculture Coalition, 110 Maryland Avenue, N.E., Washington, D.C. 20002
Telephone: (202) 547-5754
Fax: (202) 547-1837

Comments of Ferd Hoefner
Washington Representative, Sustainable Agriculture Coalition
to CSREES regarding
Implementation of Integrated REE Competitive Grants Program (Section 406)

December2, 1999

Thank you for this opportunity to offer brief remarks concerning the development of proposed rules and related implementation issues for the new Integrated Research, Education, and Extension Competitive Grants Program authorized by Section 406 of the Agricultural Research, Extension, and Education Reform Act (AREERA) of 1998. The Coalition strongly backed this provision of law and looks forward to working with the agency during its implementation.

I will address priority considerations for the development of rules and guidelines, functional stakeholder involvement, relevance to small and moderate-sized farms, and coordination with the NRI. But first I would like to touch briefly on the question of why move to integrated activities in the first place. Certainly the creation of the revised REE mission area and the unified CSREES agency as part of reorganization signaled the possibility of a more integrated approach, but actual working programmatic examples were rare when the new research bill was being put together and even now are still the exception to the rule.

In our view, a significant rationale for further movement in this direction, beyond mere cost effectiveness and bureaucratic efficiency, is to reinforce some of the founding strengths of the land grant system and the federal-state partnership -- research intimately connected to explicit consideration of real world outcomes and technology transfer considerations, educational and dissemination objectives built into research and extension projects, and extension serving its proper two-way role in communicating research results but also informing the research agenda with on-the-ground input. To be successful-to be truly integrated -- the programs that fall under this new authority must become much more than the sum of their parts. They must break down the walls and barriers that have crept in over the years and must become something truly unique and different.

With regard to program regulations and guidelines, we urge you to consider the following recommendations:

1. Adopt a regional structure. We believe that water quality, integrated pest management, and other programs that may fall under this authority in the future would be most effectively implemented through a nationally-coordinated, but regionally-administered structure. As this program develops in future years, the bulk of the funding should be reserved for regional competitive awards, with a small portion held at the federal level for special national initiatives as the need arises. The regional approach puts the program in a position to foster widespread participation while focusing on clear regional needs and priorities. It is in keeping with the "management principles" established by AREERA and also helps maintain a distribution of funds that will serve the program well in consideration of future funding.

2. Require integration at the project level. Integration of research, education, and extension objectives should not only apply at the program-wide level to an entire activity under this authority, but should also be required for each and every project awarded funding. In other words, an acceptable proposal, whether it is primarily a research, education, or extension project, should include clear plans for direct integration before any award can be made. This is one of the mechanisms that will make the program more than just an continuation of its past under a new label.

3. Mandate farmer participation in all aspects of the program. Farmers and other end users should be included in a substantial way in all aspects of the program, including but not limited to program development, priority selection, review panels, the actual research and extension projects, communication strategies, and oversight and evaluation of results. This objective requires active outreach which should be

ensured by explicit language in the rules and clear, practical guidelines.

4. Encourage broad-based, multi-institutional partnerships. Program development and design should include a broad, working partnership involving researchers, educators, agency representatives, farmers, non-governmental organizations, business, and others. The rules should require each activity and region to attain a diverse, participatory, and functional administrative mechanism. Requests for proposals and proposal evaluation procedures should also give priority consideration for funding to partnership proposals, including those with non-traditional partners or cooperators.

5. Encourage on-farm research, demonstration, and training projects. Where appropriate, the specific programs should strongly encourage on-farm projects, both as cooperating sites of larger projects and as individual projects in the own right. Each integrated activity should be required to develop specific guidelines and programmatic structures to achieve this goal in a practical and appropriate manner.

6. Provide a strong focus on systems research. Major attention should be given to interdisciplinary whole farm systems, natural systems, food systems, and area-wide research, demonstration, decision support, and training, in addition to component research undertaken in the context of systems research. Experience proves that unless this emphasis is clearly articulated in program rules and guidance and then appropriately translated into calls for proposals and review procedures, the resulting programs will fall seriously short on this critically important area for integrated activities.

7. Require communication plans. Each integrated activity as a whole, and each individual project, should be required to develop explicit plans for communicating usable results to the intended users and audiences. At the activity level, and even in many cases at the project level, this should include communication with the general public. This requirement is crucial not only to developing a cost effective, results-oriented program but also to generating continued public support and interest.

8. Incorporate economic, environmental, and social impact assessment. On both a programwide basis and in evaluation procedures for specific proposals, rigorous efforts should be required to predict and later assess the economic, environmental, and social impacts of the research and development work. Social assessment should include impacts on the structure of agriculture, economic opportunity, community cohesion and viability, and quality of life. Experience shows serious technology assessment does not generally occur unless structured into program rules and requirements.

9. Base project evaluation on multiple criteria. Proposals should indicate how the outcomes are expected to contribute to the goals of the particular program and to the national research purposes, including enhancing natural resources and promoting economic opportunities. Proposals should be evaluated based on relevance as well as technical quality, appropriate methodology, and feasibility. In addition, linkage with integrated systems, functional integration of disciplines, communication strategies, and farmer involvement should all receive heavy weighting in the review process.

10. Maintain and enforce strict conflict of interest rules. Conflict of interest rules should prohibit persons from the same institution or organization, or any consultant to such institution or organization, from participating in the discussion or recommendation of a proposal from that institution or organization. Collaborators should also be excluded.

With regard to functional stakeholder participation, we would reiterate comments we submitted in response to the proposed stakeholder input rule. We urge you to ensure that rules and guidelines for the new Section 406 authority include strong public accountability standards. Each program under the authority should establish a fair and open stakeholder process with balanced and diverse representation. All aspects of the process should be completely transparent. Most importantly, a comprehensive approach should be undertaken, with stakeholder participation in program development and redirection, portfolio review, evaluation and oversight, and where appropriate expertise exists, in proposal evaluation and selection. We urge you to make this approach to stakeholder participation crystal clear in the proposed rule.

We also encourage you to develop the new authority in a manner that will foster and encourage *independent, small and moderate-sizedfarms* and aid in the fulfillment of Recommendation 1.5 of the USDA National Commission on Small Farms. That central recommendation called on all USDA competitive grants programs for research and extension to prioritize research that contributes to the income-earning capacity and competitiveness of small farms, with a goal of devoting two-thirds of production and marketing research funding by the year 2002 to small farm-directed research. In the same way, the rules for the new program should help further the new USDA small farms policy which states in part that it is USDA policy to develop research and outreach programs that focus on the special needs of small farms and to emphasize sustainable agriculture and forestry as profitable, environmentally sound, and socially desirable strategies for small farms.

In addition to a general emphasis on small farm research, education, and extension, we also encourage you to develop *Section 407 of AREERA* -- the coordinated program of research, extension, and education to improve viability of small and medium size dairy, livestock, and poultry operations -- as part of the overall 406 authority. We are quite frankly disheartened this new program authority has not been developed to date and urge you to put it front and center on the agency's agenda. This is a critical component of small farm agriculture and one that is under attack in an unprecedented manner, making time to embark on this research and extension agenda an urgent and critical factor. Also please note the components of this program -- low cost systems, optimized use of management skills and labor, pollution prevention, value-added strategies, and technology assessment -- are key themes of the *A Time to Act* report and the new Small Farms Policy.

Finally, as the new Integrated Competitive Grants Program grows and matures, we urge you to establish a plan for closer coordination between this program and other applied competitive grants programs and the *National Research Initiative.* Coordination should include opportunity for the 406 and related programs to validate, adapt, and develop NRI-funded research in applied and systems settings and to provide regular input into the NRI process concerning research directions and priorities.

Name: Dr. Jacquelyn McCray & Dr. Samuel Donald
Organization Representing: 1890 Land-Grant Institutions

PUBLIC COMMENTS
by
Dr. Jacquelyn McCray
Chair, Association of Extension Administrators
1890 Land-Grant Institutions
And
Dr. Samuel Donald
Regional Research Director, Association of Research Directors
1890 Land-Grant Institutions
to the Cooperative State Research, Education, and Extension Service (CSREES)
U.S. Department of Agriculture
on the Implementation of Section 406
of the The Agricultural Research, Extension and Education Act of 1998
(1998 AREERA)

December 2, 1999
Washington, DC

Good afternoon. My name is Jacquelyn McCray. I am the Dean of Agriculture at the University of Arkansas at Pine Bluff. I also Chair the 1890 Association of Extension Administrators, an association of all 18 of the

nation's 1890 Land-Grant Colleges and Universities.

Thank you for giving us the opportunity today to provide input on the Section 406 Integrated Research, Education, and Extension Competitive Grants Program. Together with my colleague, Dr. Sam Donald, Regional Director for the 1890 Association of Research Directors, we represent the Extension and Research activities at these Universities. My testimony will begin our presentation which will be concluded by Dr. Donald.

The rich legacy of the land-grant tradition remains prominent on the campuses of the 1890 Institutions. They have extraordinary influence on the lives of all citizens including African Americans and other minority groups. While enduring inequities in state and federal funding, the 1890 Institutions serve as exemplary role models; provide educational access to those who may otherwise be denied the opportunity to pursue a college education; and foster an unyielding commitment to academic excellence, social equality and the assurance of a decent future for all served by our institutions, including those from the lowest economic strata of the nation. These universities have been in the forefront of educating youth-at-risk, producing research vital to the quality of life and the environment, and addressing the social and economic needs of urban and rural communities. Teaching, research and extension remain prominent on the campuses of the 1890 Institutions.

Our community has an interest in the Section 406 program not only as part of the Land-Grant System, but as 1890 Land Grant institutions we feel there are particular elements that need to be addressed given the unique opportunity to design this program to accomplish its goal of integrating research and extension to address real world problems.

Issues - As we all know, Section 406 of AREERA was established to provide funding for integrated, multifunctional agricultural research, extension, and education activities. This charge is quite different from the purpose of National Research Initiative (NRI), CSREES's largest competitive program to date. Although we understand the immediate impulse to model Section 406 after the NRI, we strongly oppose that course of action for three reasons: the different goals of the programs, the matching fund problems within the 1890 community, and the lack of opportunity for these and other institutions within the NRI program.

First, the NRI was established to promote basic research. Proposals funded through the NRI program ask specific questions and set out to find specific answers. Therefore, within this program, there is no direct link between the answers discovered and the delivery of answers to farmers and ranchers. Within the NRI, a missing element is the congruence between outreach and education. The mediary (applied research) is needed to insure useful application of basic research findings to real world problems. This is where the Section 406 program can play a real role but it must be managed properly to do so. These proposals should promote programs that take the answers found through basic research and study the collateral effects and practical application. Thus, making the findings useful to the practitioners. However, if it is operated by the same approach as the NRI, this will not be allowed to happen. Thus, disallowing the original intent of the Section 406 program as a multifunctional research and extension initiative to be realized.

Second, a serious problem among the 1890 Institutions is the matching requirement contained within both the NRI and Section 406 grant programs. Approximately one third of the 1890 Institutions have asked the Secretary to waive the mandatory matching requirement in fiscal year (FY) 2000 in order to receive the formula funds they need to survive. Given this environment and the fact that many state legislatures have already established their budgets for the coming year, it will be difficult for our universities to ask their legislatures for additional matching funds. We ask that USDA and CSREES work with the 1890 community to find ways to solve this problem and allow all Land-Grant institutions to benefit from this program.

Finally, as one of the groups of Land Grant institutions previously excluded from full participation, and as 1890 Institutions, we are concerned that our community will not be given the opportunity to participate in the Section 406 program if it is implemented with the same philosophy as the NRI. Data evaluated by OMB that

were obtained from the Budget Explanatory Notes provided by USDA to Congress illustrates why this concern exists . From FY94 to FY98, the 1890 Institutions submitted 207 research proposals totaling $36.5 million to the NRI. Of these 207 proposals, amazingly only six proposals were funded totaling $405,000. As a whole, the 1890 Institutions received 1.1% of the funding they requested. The total funding for the NRI for FYs 1994 through 1998 was an aggregate amount of $489,332,000. The six proposals that were awarded to 1890 Institutions for the total of $405,000 which comes to 8/lOOth of 1% (or .000827) of the total amount appropriated for the NRI for the 5 year period referenced above. It would be a great disservice to our institutions and the American citizens we serve to allow these results to continue by structuring the Section 406 program within the same jurisdiction as the NRI.

The research and extension efforts of our universities are vital to the communities we service and we have demonstrated our capacity to provide integrated, multifunctional research, extension, and education activities. At this time, I would like to turn our presentation over to Dr. Donald who will discuss some of the integrated problem solving areas where we believe the 1890 Institutions could make a significant contribution, if given the opportunity.

Integrated Problem Solving Capacitv of 1890 Research and Extension Functions - As Dr. McCray mentioned, I serve as Regional Research Director for the 1890 Association of Research Directors. Our community has extensive examples which illustrate our ability and commitment to address real world, integrated problem solving activities, the major goals of Section 406. I will share with you three examples.

1. While large segments of the older population live in rural areas, little is known about their status relative to quality of life and well-being. Recognizing this gap in the literature, scientists from the 1890 Institutions initiated a regional research project (RR-4 - Quality of Well-being of the Rural Southern Elderly: Food, Clothing and Shelter) to conduct a comprehensive study of the rural elderly population. The purpose of this project was to determine the quality of life of the rural elders by assessing the actual and perceived status of nutrition, clothing, and housing and the interdependence between and among the status parameters.
2. Extension counterparts, at a number of our institutions, carried forward the crucial outreach to rural elders and their service providers. Small farmers from the southeastern United States and other areas around the nation are struggling to survive. Directing attention to alternative enterprises can make a significant contribution to the economic well being of small farmers. This is especially true for southeastern farmers and others who are seeking viable production alternatives to growing tobacco and other row crops. One example of the important contribution of the 1890 Institutions in developing alternatives for crop and livestock enterprises is the small ruminant research and extension efforts. For example, the U.S. goat industry, at one time, lacked the necessary expertise and technologies to meet growing demand for quality goat products. The 1890 Institutions, through integrated research and extension programs/activities, have been the leaders in developing technology and management systems needed to give the necessary momentum to the newly emerging small ruminant industry. Given this new technology, a growing demand globally for nutritious goat products, and the influx of ethnic groups with a preference for goat meat, the industry has experienced tremendous growth within areas served by the 1890 Institutions. Aquaculture is not only one of the fastest growing segments of U.S. agriculture, it is one of the fastest growing food production activities in the world. To illustrate the point, lets look at Arkansas. Being given sole responsibility for developing the state aquaculture industry ten years ago, the University of Arkansas at Pine Bluff integrated its research, extension and education program in aquaculture with emphasis on improving catfish and baitfish production and marketing. Arkansas has now moved from the fourth to second catfish producing state in the United States and is now the largest baitfish producer in the country. Arkansas' integrated aquaculture program was designed ten years ago in the very image of the Section 406 concept. In 1998, per capita consumption of seafood in the U.S. was 14.6 pounds. The U.S. trade deficit in edible fisheries products is $5 billion per year, with shrimp alone being almost $2 billion. In 1998, total shrimp imports reached $3.1 billion, an increase of five percent from previous years. The 1890 Institutions have aided in the economic growth of the aquaculture industry by providing hatchery and nursery production of aquaculture species such as stockershrimp and hybrid striped bass. In addition, there is continuing research being done at 1890 Institutions on freshwater shrimp, paddlefish and its caviar. Because of the role the 1890 Institutions have played, aquaculture is a great example of how a growing industry benefits the

whole economy.

Conclusion - In closing, the funding available through the Section 406 program can create real world opportunities for great results. However, this is dependent upon establishing a structure where the entire community can benefit and the mission of the Section 406 program can stay intact. We would be more than willing to work with appropriate officials to insure a fair opportunity for the 1890 Institutions and other minority serving institutions to help accomplish the goals of the Section 406 program. We too can help solve the nation's water quality, food safety, pesticide, and other agricultural problems. Again, we appreciate the opportunity to provide input and we look forward to helping make this program a success. Because knowing that time would not permit, we have included a more expansive list of potential areas where the 1890 Institutions could contribute to further integrated extension and research activities in an addendum to the written copies of our testimony provided to you today. On behalf of Dr. McCray and myself and the associations we represent here today, we respectfully reserve the right to revise and extend our remarks beyond our testimony today for the duration of the open comment period for Section 406. Thank you for your attention.

ADDENDUM 1

ECONOMIC EVALUATION OF SUSTAINABLE SMALL SCALE AQUACULTURE/VEGETABLE FARMS IN SOUTH CAROLINA

JUSTIFICATION

Integrated systems approaches utilize research findings of several disciplines and the experience of the farmer to develop whole farm systems. Because many different commodities and management techniques are considered, a variety of production based problems arise. The common thread tying integrated management technologies together is that the sustainable practices need to be profitable to the farmer. Economic evaluation of sustainable agriculture techniques appears to be lacking and until these practices are shown to be cost effective the techniques will not be accepted widely.

Sustainable farming generally results in a less intensive culture. For small-scale sustainable farmers to remain competitive they need to' integrate their production activities and target specialty markets for their output. Because of socio-economic and demographic changes there is a growing international and organic food market in South Carolina-Small scale farmers may be able to increase their incomes by selecting in advance, crops and fish varieties and production techniques preferred by this high consumption but under served clientele. Through proper preparation (marketing surveys), small family farms may determine high value, specialty markets in advance of production, and meet those market demands while using IPM, ICM and IRM techniques. The market survey allows the, farmers to add value before the commodity is produced.

The southern region continues to grow and become more ethnically diverse. Because of the warmer weather, there is an influx of retired people from northern parts of the 1, United States who are more educated and nutritious conscious. Immigration is not just from within the United States but from abroad. Consumers of agricultural products express a diversity of preferences and offer increasing opportunity for the marketing of products new to the southern region. The value of the international and other specialty markets is unknown, but preliminary market surveys indicate a preference for fresh organically grown Vegetables and fish which are alive when purchased.

The economic implications of providing "organically grown" fresh vegetables and live fish to these specialty markets have yet to be investigated. Until recently, sustainable production of fish in the US has received little effort. Herbivorous and detritivorous fish, like the carps, were generally of low demand to the American consumer. Recently, tilapia (T', nilotica or African bream) have become a popular food fish. Intensive culture at (commercial facilities has required supplemental feeding with artificial feeds. The components of these feeds are usually grown with the assistance of chemical fertilizers and pesticides. Research has shown that tilapia. can be cultured on algae alone. The preliminary studies on the new culture system being developed

at Clemson University suggests that the growth rates of tilapia WTI on algae to be competitive with those grown on commercial feeds. However, this new technique has not been tested in a Teal world situation. Economic evaluation of The system also needs to be determined.

The impact of sustainable agriculture on environmental health has received a lot of publicity. However, few scientific studies. have been conducted to evaluate the impacts of sustainable practices on the environment. Additional, research is needed to evaluate soil quality prior to and following the projects.

PREVIOUS WORK AND PRESENT OUTLOOK

Many studies have evaluated the profitability of pond culture systems Linear programming techniques have often been used to analyze the impacts of including a catfish enterprise on a representative row-crop farm *(Pomeroy* and Sureshwaran, 1991). Results indicate large aquaculture operations to be highly profitable. Ile success of large aquaculture operations in the United States validates the results obtained from these analytical approaches.

The most important species produced by the South Carolina aquaculture industry is channel catfish (Ictalurus Punctatus). Foltz (1983) found that because of resource and climatic conditions, catfish production is concentrated in the Coastal Plains of South Carolina. Many commercial catfish producers in South Carolina use the pond culture system. Therefore, large acreage increases in the Coastal Plains of South Carolina may not be possible due to the high cost of laud suitable for aquaculture. However, cage culture is one of the possibilities to consider for the other regions of the state. Very few studies have evaluated the economic feasibility of cage culture on a small scale farm. Sureshwaran, et at (1996), used a multiperiod linear programming model to analyze the economic feasibility of cage catfish culture on a commercial scale on small scale farms in South Carolina.

Commercial scale was defined as selling in large quantities to processors of catfish. Their results suggest that only a few low-income farmers can produce catfish in cages on a commercial scale. Their study did not evaluate the potential of selling catfish to specialty markets at higher prices.

The study by Sureshwaran, et al, was funded by USDA-CSRS Capacity Building Grant provided to the Department of Agribusiness and Economics at South Carolina State University. Clemson University was the collaborating institution. This is a continuation of that project, with the same investigators, and the objective of analyzing in more depth some of the problems encountered previously. For example, the environmental effects of aquaculture development was identified as a major concern, One of the contributions of that project was a bulletin entitled, "Discussion of the Environmental Impacts of Aquaculture Development" (Nettles, Technical Paper, 1995). According to the work that has been done at SCSU, cage catfish culture is not an economically viable enterprise for many small scale farmers. This is because: (1) many small scale farmers do not have ponds large enough to produce catfish on a commercial scale; (2) there are no commercial catfish processors in the state; and (3) demand for catfish is not *sufficiently* developed within the state. However, the small scale farmers can use a caged fish enterprise to supplement their income. Caged fish farmers can also increase their incomes by producing vegetables. The proposed project is a more in depth investigation of the alternatives available to small scale farmers.

The paradigm for integrated aquatic and terrestrial sustainable agriculture is ancient practice in Chinese fish and duck farming (Edwards, 1991). Water from freshwater fish ponds has been used to irrigate and fertilize row crops and recent reports demonstrate the value of applying sludge accumulations from fish rearing systems to soil increases silt, organic matter and fertility (Westerman et at 1993). Polyculture of several fish species in freshwater provides an excellent paradigm of sustainable aquaculture in terms of protein transformations. Each species occupies a different grazing niche with the whole assemblage supported by organic fertilizers. The combination of fed crop (e.g., carp or catfish) and a filter feeding fish (e.g., tilapia) seems promising as the nutrient input via organic feed creates a rich phytoplankton bloom which in turn provides the food base for the tilapia. Moav et al. (1977) and Schroeder .(1989, 1974) showed that fish can be produced on animal waste and agriculture. residue According to Brune (1994), tilapia are algae feeding

fish and by removing the algae biomass from the pond the growing fish cause the pond to become a net oxygen producer, permitting an increase in carrying capacity. Williams et al. (1985) found that the addition of blue tilapia can help to solve the algae problem with caged catfish, i.e., deterioration of water quality. Addition of tilapia to the pond system may stimulate other fish to grow faster. A new culture system being developed at Clemson University shows growth rates of tilapia will be competitive with those grown on commercial feeds. This new technique needs to be tested in a real world situation and an economic evaluation of the system needs to be determined. The co-researchers at Clemson University are also testing a larger scale model of this same system. It is a pond fitted with a bank-side curtain creating a raceway area through which water is circulated, Fish production cagesare located in the river way area. This system separates fish production from the waste assimilation and oxygen production component of the pond.

ADDENDUM 2

EVALUATION OF EFFECTIVE INTERVENTION STRATEGIES TO IMPROVE THE QUALITY OF WELL BEING OF RURAL ELFERS IN SOUTH CAROLINA
Duration: February 1991 to September 30, 1995

Justification

Several years ago, the United States Census Bureau (Bureau of the Census, 1986) reported that 29.2 million persons 65 years or older were living in this country. According to the projections of the Bureau, the elderly population in the United States is expected to increase by 4 million between 1987 and 1995. After 2010, as baby-boomers become senior citizens, the 65 and older age group will increase from 39.4 million to 52.1 million in 2030, and to 65.6 million in 2040 (Bureau of Census, 1989). Not only is this age group the most rapidly growing segment of, the population, but a further breakdown reveals that the largest increase will continue to be among those over the age of 85. Since this age group is growing at nearly twice the rate of the rest of the population, the assortment of services needed is also rising rapidly. Furthermore, as the longevity revolution expands, a large percentage of this population will continue to live in rural areas and small towns and will therefore need an increasing array of services.

Despite long-standing intentions of legislators, service providers, and others to improve the quality of life fox elders, the needs of many older persons living in rural America remain unmet. The need to address specific concerns with regard to transportation, nutrition, health and housing was one of the recurring problems that was identified by 27 State Offices on Aging, (Pressler & Swenson, 1984). Pressler and Swenson further stated that many policies and programs affecting the elderly seem to be designed for urban areas and later applied to rural areas almost as an after thought.

While large segments of the older population live in rural areas, little is known about their status relative to quality of well-being. Recognizing this gap in the literature, scientists from the 1890 institutions initiated a regional research project (RR-4 - Quality of Well-Being of the Rural Southern Elderly: Food, Clothing and shelter) to conduct a comprehensive study of the rural elderly population. South Carolina was a participating state. The purpose of this project was to determine the quality of life of the rural elders by assessing the nutrition, clothing, and housing actual and perceived status and the interdependence between and among the status parameters.

During Phase I of RR-4, core data were collected from 3200 southern rural elders, aged 65 or older. it included:

Sociodemographic data issues and concerns Situation rating of basic physical needs Ratings on meal preparation	Availability of community services Availability of home safety facilities Sources of clothes,

Meal time social setting Tobacco usage Special diets and diet Prescription Perceived status of health, body weight Health problems and medical treatment Nutritional belief and Practices source of food supply Housing situation Housing costs and repair Availability and conditions of household appliances Room accessibility and Conditions meal patterns	clothing selection conditions and methods of payment Importance of selected clothing features Preferred clothing style Quality Of Well-being indicators Income source, payment received and spending patterns Assistance required with living activities Transportation and physical concerns Use of vitamins/minerals Nutrient consumption

Phase II data collection was an in-depth study on a subsample. It included:

Anthropometric measurements Hematological and biochemical parameters - hemoglobin, hematocrit, serum cholesterol	triglycerides, HDL cholesterol, LVL cholesterol Follow-up questionnaires on housing and clothing Food/nutrient/consumption

Additional data from ancillary studies by selected institutions included:

Additional biochemical parameters Body fat measurements Specific information on use of medications	overall nutritional status determined in three consecutive seasons

RR-4 preliminary findings revealed prevalence of problems among rural elders in the areas of health, nutrition, housing, clothing, socioeconomic, psychological and physical well-being. Some of the findings of the PR-4 project are highlighted as follows:

1. Many older rural Americans suffer from chronic diseases including arthritis, cardiovascular diseases, gastrointestinal conditions, kidney problems, diabetes, asthma, in addition to hearing, dental and vision problems. These chronic conditions often prevent functional independence and increase the need for primary care, dietary management and assistance with basic activities related to daily hygiene, shopping, meal preparation and transportation.

2. The literature clearly indicates that rural elders are disadvantaged due partly to income and transportation problems which are made worse by lack of services and isolation. Some of these problems require governmental intervention while others can be rectified at an individual or community level, so that the quality of well-being of these elders can be improved substantially. As the size of the elderly population increases disproportionately and resources become scarcer, intervention programs and strategies designed

to help older individuals modify their environment to meet basic human needs become increasingly important in our society. The purpose of the regional research project (RR-6) is to develop intervention programs and strategies to address the problems/needs identified in the RR-4 project and to assess the effectiveness of these interventions on improving the quality of well-being of rural elders.

3. Rural Elders must be assisted in obtaining financial assistance and surplus food which could help alleviate some of the nutrition and health problems they now face. They need help in understanding and using existing community programs and services to maximize their limited resources and thereby improve their quality of well-being. Findings from the RR-4 study indicate that rural elders need immediate intervention plans to meet some of their basic needs in the areas of housing, nutrition and service utilization. Appropriate intervention programs using approaches which recognize the heterogeneity of the elderly population and build on reliable guidelines will serve to decrease nutritional risks, housing inadequacies and delay health deterioration and thus help elders obtain and maintain satisfactory life quality. Intervention programs, centered around the needs of the elders and utilizing multidisciplinary approaches, will be developed jointly among the participating 1890 institutions. This kind of collaboration can only be possible from a cooperative effort through a regional project, involving multi-states, which will allow the interventions to be tested simultaneously on a large sample population of rural elderly. Thus, the possibility of being able to generalize the findings to a larger population.

ADDENDUM 3

OTHER INTEGRATED ACTIVITY EXAMPLES IN THE 1890S UNIVERSITIES

1. Tested water samples from wells of rural families for nitrates and pesticides;

2. Determined soil loss coefficients for fruits and vegetables;

3. Developed new invitro systems for enhancing root system development of pine and hardwood trees;

4. Found that increased production of rapeseed will provide an efficient domestic source of erucic acid oil, reduce expensive imports of rapeseed oil, help control environmental pollution resulting from use of inorganic pesticides, and assist in the development of sustainable crop production;

5. Found that N-methyl aspartate enhanced growth and reduced fat in swine and chickens;

6. Demonstrated that gamma irradiation of broilers eliminated 99% of microbial contamination;

7. Found that self-rating by 9-12 grade students in 19 rural schools mirrored the reward systems in the schools;

8. Developed Simmental cattle with a high rate of twinning;

9. Determined that lambs and kids produced on cowpeas are lean and low in fat and preferred by consumers;

10. Developed a simplified field test for water engineers and seafood producers and processors of two major flavor contaminants;

11. Developed a new vegetable legume cropping systems to grow peanut and sweet potato invitro;

12. Developed a screening system to detect aflatoxins in peanuts;

13. Developed a database that provides information used by swine industry, agencies, and education institutions;

14. Demonstrated a direct relationship between diet and exercise on hypertension and diabetic African American women;

15. Determine that dietary omega-3 polyunsaturated fats have beneficial properties to change physical and biochemical processes to control blood pressure;

16. Developed intensified "Farm Planning Program" for farmers to improve profitability from crops, livestock, and alternative farm enterprises; and,

17. Conducted senior citizens conferences on consumer fraud, security, energy conservation, an modification of dwellings for handicapped use and access

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Name: Mary-Ellen Devitt, Project Coordinator
Organization Representing: SAES/USDA-CSREES, National Environmental Initiative (SUNEI), 4321 Hartwick Road, Suite 120, College Park, Maryland 20740-3210
Telephone: (301) 403-4244
Fax: (301) 403-4310
E-Mail: md149@umail.umd.edu

PUBLIC COMMENTS
by
Mary-Ellen Devitt
Project Coordinator
SAES/USDA-CSREES
National Environmental Initiative (SUNEI)
to the
Cooperative State Research, Education, and Extension Service (CSREES)
U.S. Department of Agriculture
on the
Implementation of Section 406
of the
The Agricultural Research, Extension and Education Act of 1998
(1998 AREERA)
December 2, 1999

Thank you for the opportunity to submit comments on the Agency's Implementation of Section 406 and the new Cooperative State Research, Education, and Extension Service (CSREES) competitive grants program that integrates research, education, and service (extension) functions.

My name is Mary-Ellen Devitt. I am the Project Coordinator for the SAES/USDACSREES National Environmental Initiative (SUNEI), pronounced "sunny." I am here today on behalf of the SUNEI Steering Committee.

SUNEI is a federal-state outreach partnership focused on environmental issues. In January l 997, the State Agriculture Experiment Station (SAKS) Directors and USDACSREES initiated SUNEI activities. As a primary goal, SUNEI works to broaden this partnership of the Land Grant Universities (LGUs) and USDA-CSREES to other federal agencies. SUNEI's aim is to reposition the LGUs more centrally on the national environmental research agenda and to attract new resources for environmental research and education activities conducted at LGUs. To this end SUNEI's major activities include:

- Continuous identification of mission-relevant, potential partners;

- Long-term fostering of communication among interagency partners;
- Assistance to federal agencies in gaining access to the LGU System;
- Facilitation of partnerships by our universities with agency decision-makers; and
- Information distribution about financial resources and other opportunities to LGUs.

SUNEI's purpose is to facilitate teaching, research, and extension activities of the LGU's in areas of environmental science as they relate to agricultural and natural resource issues, through traditional and new federal-state partnerships. SUNEI leadership has selected three well-defined areas with national relevance as SUNEI's priorities, with the first two receiving our concerted attention in the near term. These three areas are:

1. Water Quality: to preserve and protect the quality of our nation's water;
2. Global Change: to develop agriculturally based remediation methods for the changing global environment; and
3. Invasive Species: to protect against invasive species and native species decline, while preserving desired bio-diversity.

Regionalized Competitive Grants

In particular to today's comments, the SUNEI Steering Committee recommends that a hybrid of the LGU Multi-State research, Integrated Pest Management (IPM), and Sustainable Agricultural Research and Education(SAE) management strategies could be effective mechanisms to manage the CSREES intergrated competitive grants program.

We suggest that committees similar to the Multi-State Research Committees be developed including Extension, Academic Programs, and Research faculty to guide and formulate competitive grants requests for proposals. Formerly known as Regional Research, Multi-state Research Programs successfully manage projects across state from the IPM and SARE models. Unlike the National Research Initiative (NRI), both of these programs currently review integrated proposals that into consideration applied extension and education activities, noy just basic research questions. Therefore, SUNEI suggests that some combination of these three programs will be the most logical strategy.

The direct advantages to CSREES in this regional approach would be in the forms of:

- staff-support for the program that would otherwise be difficult to provide, given the current federal employment caps;
- direct access to a regionally organized stakeholder listening system;
- programmatic input form committees of technical experts;
- greater cost effectiveness for panel meetings;
- better processes for collecting project impact information; and
- more support for the federal-state partnership than through other forms of grants management.

Other Benefits of a Regionalized Competitive Grants Program

Regionalized competitive grant management would provide the best alternative for managing the Integrated Activities proposed in the fiscal year 2000 Budget for some of the following reasons. We could:

Meet the intended goals of Congress when it created the Integrated Account. Congress has directed CSREES and LGUs to partake in applied problem-solving competitive research and education, as well as multi-state activities in these topical areas. The regional mechanism will include multi-state research and extension committees for proposal development, distribute responsibility geographically, alleviate problems with conflict of interest, and provide topic specific focus and management.

Better support functionally integrated activities, over centralized efforts. The very nature of the

combined funds demands that integration of research, education, and extension must occur. However for these functionally integrated grants to be managed effectively on a national scale, some segmentation is necessary such as geography (i.e., regions or multi-state divisions).

Become more relevant to regional priorities. Because of the regional proposal development committees, competitive proposals will be more responsive to local and regional stakeholder needs. A two-tier merit process that takes into consideration both scientific merit, as well as regional relevance would assure this.

Increase long-term funding sustainability. Moving toward regional competitive grants will increase the Land Grant System's long-term funding sustainability. Because competitive grants seemed to be the more favored option of Congress and key decision-makers, LGUs may also be better positioned to grow the integrated accounts in the future.

Better demonstrate applied regional and local impacts. Because of regional priority setting, LGUs will have better ways to communicate applied local/regional impacts of grant funding to policy-makers. Although we believe in a balance portfolio of funding mechanisms including ffirmula funding, LGUs need to better demonstrate that we are competitive and critical players in meeting the needs and problems of the American public.

Encourage states to work together. If we adopt regional priorities, and encourage states to work together by awarding larger grants for multi-state "team" water quality programs, we will be able to maintain the Land Grant's strong water quality infrastructure and encourage regional networks.

Specific Water Quality Program Areas

In cooperation with CSREES, SUNEI would like to work with the Agency and the Extension National Advisory/Leader Team (NALT) to focus a list of the high priority water quality needs, be this through listening sessions or survey. Below is a list of some initial pogram aeas in water quality that SUNEI believes reflects some of the changing needs of society, ad realigns the agricultural and natural resource community toward the growing number of suburban and unban clients that Land-Grants must now serve. Although, each of the following programs falls under a topical category, each includes an overarching environmental education and outreach component. Some program areas include:

Water and Watershed Management including:
- Nutrient Management/Animal Waste Management/Harmful Algal Blooms
- Water Scarcity and Availability
- Wetlands Groundwater Recharge

Land-Use Planning and Management including:
- Sustainable Development to Reduce Urban/Suburban Polluted Run-Off
- Land Conservation and Openspace for Recharge and Ripannian Buffer Strips
- Coastal Zone Management

Environmentally and Economically Sound Agriculture including:
- Alternative and Integrated Pest Management to reduce Pesticide Use and Improve Water Quality
- Sustainable Agriculture and Turf Management to reduce Water Inputs and Polluted Run-Off
- Precision Ag, Forestry, and Range Resources to Reduce Inputs and Run-Off

Environmental Modeling, Monitoring, and Forecasting including:
- Natural Disasters and Floods to Monitor Saturated Soils and Reduce Run-Off
- Weather ad Climate Forecasting to reduce Risks of Polluted Run-Off
- Nutrient Management Models to meet clean Water Action Plan Requirements

UNITED STATES
DEPARTMENT OF AGRICULTURE

Additional Recommendations

Additional recommendation include the following:

- SUNEI would suggest that however CSREES chooses to implement Section 406 and the integrated competitive grants that regional management of peer review panels, chairpersons, and committees be adequately funded.
- SUNEI would like to work with CSREES to leverage water quality program dollars with other agency funding, especially EPA, to increase the total amount of the competitive grants program in water quality. We feel that this leveraging with other agency funds will directly serve Land Grant System needs. If we can leverage USDA funds to increase the pool of funding, we will be able to fund larger projects, more of them, and better meet regional agricultural and natural resource stakeholder needs in water quality without taking away existing program dollars from other USDA accounts. Additionally, we would eliminate the problem of budget caps by building the resources available, without skewing the Agency's budget limits.
- Similar to the IPM and SARE models, SUNEI recommends that opportunity announcements for these funds be communicated not only through the Federal Register, but also through a variety of Web based tools.
- The regional management structures for the Multi-State Research, IPM, and SARE Programs are moving toward paperless and WWW based systems. If we follow this trend, out-sourced regional management costs will be lower for the Agency. SUNEI recommends that CSREES apply these new technologies in managing these competitive grants.
- SUNEI would also suggest that CSREES call for pre-proposals that would be reviewed by the region's tri-functional committees. The purpose of the pre-proposals would be to encourage proposals that most appropriately fit the RFPs and the applied regional needs, in turn saving time and energy for faculty members.

Thank you for the opportunity to submit comments on this important topic. Please contact the SUNEI Office at 301-403-4244 if you have questions about this testimony.

Name: Gary W. Jackson
Organization Representing: Farm*A*Syst/Home*A*Syst, Voluntary Pollution Prevention Programs, B142 Steenbock Library, 550 Babcock Drive, Madison, Wl 53706-1293
Telephone: (608) 262-0024
Fax: (608) 265-2775
E-Mail: farmasyst@macc.wisc.edu; homeasyst@macc.wisc.edu

December 3, 1999

UNITED STATES
DEPARTMENT OF AGRICULTURE

Terri Joya
USDA-REE-CSREES-PS-CRGAM
AEROSPACE RM 3RD FL.
901 D Street S.W.
Washington, DC 20250

Dear Ms. Joya:

I am writing to present my comments on the development of administrative rules for the new Section 406 of the Agriculture Research, Education and Extension Reform Act of 1998 (AREERA). I am sending these comments electronically, but have also sent three printed copies.

My comments will focus on the design of administrative rules that address the appropriations report language that states: "Within the funds made available for water quality, the conferees expect that no less than the fiscal year 1999 levels of funding will be provided for the Farm*A*Syst/Home*A*Syst program." To carry-out the intent of this language, it is necessary to determine what the 1999 levels of funding were; identify the categories of funding; and interpret intentions related to maintaining or expanding a nationally-coordinated program.

As Director of the National Farm*A*Syst/Home*A*Syst program, I have requested a review of financial records to determine the 1999 funding level and the categories of funding. Findings include:

1. At least $1,110,000 of water quality funds were used to support Farm*A* Syst/Home*A*Syst activities in 1999;
2. Categories of funding included $500,000 in competitive grants; at least $400,000 in program support for states; and $211,000 for national program development and coordination.

These levels were determined through currently available records. I am certain that the level of state Water Quality Program support is significantly higher, but cannot determine a more accurate level without surveying states to improve our data.

Senator Kohl and Congressman Obey clarified the intent of this report language. They indicate the intent was to provide funding to maintain capacity of a national program that provides coordination among state projects; to facilitate cost effective program development and delivery and partnership building capacity; and to provide for continued program impact evaluation and reporting (see enclosed letter). Congressional staff have offered to meet with CSREES staff to further clarify their intent and to facilitate the development of supportive administrative rules.

Report language stating that no less than fiscal year (FY) 1999 funding be provided, allows administration the discretion to increase funding levels. Increasing funding to establish a research component for the

Farm*A*Syst/Home*A*Syst program would allow for the applied risk assessment materials to be routinely updated with the latest research based recommendations; facilitate the development of impact evaluation criteria that would document pollutant load reductions resulting from practices implemented as a result of Farm*A*Syst/Home*A*Syst; and aid in developing program delivery approaches that continue to improve the cost effectiveness and user acceptance of the program.

Farm*A*Syst is being used as a model for developing commodity-specific environmental management systems in the United States and internationally. As a result, this program is strengthening partnerships between supporting agencies and the private sector and is facilitating direct application of research information in producer decision-making. Interest shown by agricultural organizations supports the request that additional funding be made available. This support will assist commodity groups and other private sector organizations in adapting the Farm*A*Syst program to aid them in providing leadership in helping producers take voluntary actions that address current environmental problems and prevent future problems.

The FY 1999 Water Quality budget was increased by $500,000 to provide additional support for Farm*A*Syst. Nine agricultural organizations submitted letters of support for that increase. Their support was a significant factor that facilitated the budget increase. These organizations are supporting voluntary approaches that help agricultural producers use good science to take appropriate site-specific actions to address legitimate environmental issues. Farm*A*Syst is supported as an appropriate tool to help in this effort. It is important that the trust of these partners not be betrayed by redirecting these funds to other projects.

National and state partnerships resulting from the Farm*A*Syst/Home*A*Syst program have resulted in leveraging at least three dollars of support from sources other than national CSREES for every national CSREES dollar. More importantly, state and local implementation of the program is resulting in cost-effective investments by program participants. To date, Farm*A*Syst users have invested more than $60,000,000 in pollution prevention actions. These figures are based on direct uses of Farm*A*Syst. They do not include results of commodity-specific adaptations of Farm*A*Syst. Maintaining this type of return on educational investment requires that the program identity be maintained and that there continue to be support for a national coordinating mechanism. I recognize that this can be challenging under the competitive criteria of Section 406. However, an option that may both support the continuation of this national program and the competitive requirements of this section is to offer a single grant for the continued development and coordination of this effort. The inclusion of additional funding above the 1999 level to establish an active research link would further strengthen this approach.

Thank you for considering my comments. Please contact me if additional information or clarifications are needed.

Sincerely,

UNITED STATES
DEPARTMENT OF AGRICULTURE

/s/
Gary W. Jackson, Director
National Fann*A*Syst/Home*A*Syst Program

encl

GWJ:mhm

Name: Herbert Koal
Organization Representing: United States Senate, Washington Office, 330 Hart Senate Office Building, Washington, DC 20510-4903
Telephone: (202) 224-6863; T.D.D. (202) 224-4464
E-Mail: senator.koal@kohl.senate.gov
Web Address: http://www.senate.gov.hkohl

HERBERT, KOAL
Wisconsin

Washington Office
330 Hart Senate Office Building
Washington, DC 20510

United States Senate
Washington, DC 20510-4903

December 1, 1999

Charles W. Laughlin
Administrator
Cooperative State Research, Education & Extension Service
U.S. Department of Agriculture
1400 Independence Ave, S.W.
Washington, DC 20250

Dear Administrator Laughlin:

We are writing to urge CSR~EES to maintain funding for the national Farrn*A*Syst/Home*A.Syst program at

no less than fiscal year (FY) 1999 levels of finding as directed by report language accompanying H.R.1906, the fiscal year 2000 Agricultural Appropriations Conference Report.

In FY 1999, USDA provided 51,110,000 in water quality funds to Farm*A*Syst/Home*A*Syst for three primary functions: $500,000 for competitive grants for state programs, $210,000 to support national coordination and $400,000 in state water quality program fiends used for Farm*A*Syst/Home*A*Syst activities. This is the minimum amount necessary to maintain an effective national Farm*A*Syst/Home*A*Syst network of state interagency programs.

We understand that CSREES is developing administrative rules for funds appropriated under Integrated Activities, including water quality. However, we remind you that Congress intended that Farm*A*Syst/Home*A*Syst be funded at FY 1999 levels and through a single grant recipient regardless of the process for distributing the remaining funds under the integrated accounts. This approach will maintain a national program focus and capacity, providing coordination among competitively-funded state projects and coordinated assistance for program development, partnership building and impact evaluation. These national coordination functions have been essential for the growth and maintenance of programs in all 50 states.

CSREES partnership role with the National Resources Conservation Service and the Environmental Protection Agency has been critical in supporting national Farm*A*Sys/Home*A*Syst program activities (e.g. coordination, materials development and innovative programming). Given your agency's commitment to the program for nearly decade, we urge you to continue to use funds, as directed by Congress, to support this outstanding national program.

We thank you in advance for your assistance. Please feel free to contact us if you have any questions.

Sincerely,

/s/
Herb Kohl & Dave Obey

cc: Colien J. Hefferan, Associate Administrator
Ralph Otto, Deputy Administrator, NRE

Name: Zane R. Helsel, Director
Organization Representing: Rutgers Cooperative Extension, New Jersey Agricultural Experiment Station, 88 Lipman Drive, New Brunswick, NJ 08901-8525
Telephone: (732) 932-9306
Fax: (732) 932-6633

UNITED STATES
DEPARTMENT OF AGRICULTURE

Web Address: Web: wvww.rce.rutgers.edu

December 14, 1999

Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, STOP 2240
1400 Independence Avenue
Washington, DC 20250-2240

Subject: Section 406 AREERA-1998 Comments

I am writing to provide comments to the USDA Cooperative State Research, Education and Extension Services request for input relative to the implementation of Section 406 of AREERA (7 U.S.C. 7626). It is important that I first note that it is indeed very unfortunate that Congress chose to take monies originally appropriated for water quality, food safety, and pesticide impact assessment as Smith-Lever 3d dollars and convert them to Section 406 monies. It was intent of AREERA -1998 that Section 406 would be used for new monies appropriated above and beyond the original resources dedicated to programs like Smith-Lever 3d. This move has effectively terminated the infrastructure within Cooperative Extension throughout the nation to deliver important day-today programs in these three areas and provide coordination among states within regions and nationally. Also by doing this Congress has effectively reduced the amount of funds that can be delivered to targeted programs in the field. Various administrative costs on 3d funds are less than 10% whereas on Section 406 they will be over 50% thus significantly reducing dollars that are put to work in the field. It is with these sets of circumstances I offer the following recommendations for Section 406 AREERA.

1. CSREES-USDA should make every effort to inform Congress of the impact of their decision and reverse the designation of the current Smith-Lever 3d funds to Section 406. Should Congress not see the wisdom of such a opportunity, then:

2. Funds should be granted through a RFP process that requires and gives priority to the following:
   - Funds should go to institutions that can demonstrate an outreach capacity of research or educational programs through county Cooperative Extension units.
   - Funds should go to institutions that can receive those funds via a letter of credit where little or no indirect cost or other administrative costs are incurred in their use.
   - That institutions awarded these funds have a demonstrated research and extension programs working relationship.
   - Recipient institutions must be able to demonstrate a regional and national network of distribution of educational programs.

3. Administration of the grant process can be either national or regional which ever has the lowest administrative cost.

4. Regional programs currently within CSREES for IPM, SARE and PIAP are the best means of regional/multi-state programming if administrative costs to run the program are no greater than those to run it at the national level.

5. Evaluation should be based on a peer and merit review system.

6. Program priority in the RFP should be based on local, regional and national stakeholder input.

I would be more than happy to discuss with USDA or Congress details of my comments.

Thank you for the opportunity to participate in this process.

ZRH/mg

Name: Deborah G. Grantham, USDA State Extension Water Quality Coordinator
Organization Representing: Cornell Cooperative Extension, Department of Soil, Crop, and Atmospheric Sciences, Bradfield and Emerson Halls, Ithaca, NY 14853-1901
Telephone: (607) 255-2177
Fax: (607) 255-6143
Web Address: www.rce.rutgers.edu

To: Terri Joya
USDA-REE-CSREES-PS-CRGAM
AEROSPACE RM 3RD FL.
901 D Street S.W.
Washington, DC 20250

From: Deborah G. Grantham
USDA State Extension Water Quality Coordinator
Cornell University

Date: December 15, 1999

Re: Implementation of the Integrated Research, Education and Extension Competitive Grants Program

UNITED STATES
DEPARTMENT OF AGRICULTURE

I would like to provide comments on implementation of Section 406 of the Agriculture Research, Education and Extension Reform Act of 1998 (AREERA). While I recognize that changes in funding strategies are inevitable and necessary, I believe that Section 406 should have been funded from new money, not from core funds that have been successfully leveraged nationwide for critical, core extension programs.

The mission of the CSREES Water Quality Program is to provide leadership to enable individuals, industry, and government to effect changes that enhance and protect the nation's water resources for the public good. The vision for the program is to be recognized as an important and effective partnership providing leadership to solving current and emerging water quality issues. The Water Quality Program is at the forefront of the effective integration of research and extension and has been able to develop a level of capacity at the state and regional level through a national network of Land Grant Universities, which is both proactive and responsive to emerging issues.

The success of the CSREES Water Quality Program has been made possible by:

- base funding to each land grant university that has been successfully leveraged nationwide for critical, core extension programs; and
- the support of national initiatives such as the Farm*A*Syst/Home*A*Syst framework by insuring adequate funds for national coordination and state implementation. Removal of these funds from 3d program funds into the Section 406 account will severely erode the ability of the extension system to continue conducting effective Water Quality programming.

In New York State, we have used core Water Quality funds to maintain a presence for Cornell Cooperative Extension in state-level policy discussions on water resources management, including the New York State (NYS) Department of Environmental Conservation (NYSDEC) Nonpoint Source Coordinating Committee and the New York State Department of Health Source Water Assessment Program. Our participation has allowed us to make substantial contributions to policy decisions and to receive funding for implementation of educational

Since 1993, we have delivered nonpoint source pollution and watershed management education to a broad audience in the Northeast region using distance learning methods, including satellite broadcast videoconference. The CSREES Water Quality Program provided significant funding that allowed us to leverage. US Environmental Protection Agency/NYSDEC Section 319 Program funds, to approximately double the total amount available for the education.

We have used core and competitive funding to pilot Home*A*Syst in NYS. That work has lead to adoption of the methods in various areas of the State, including:

- the Skaneateles Lake Watershed Program, with significant support for Cornell Cooperative Extension (CCE) of Onondaga County coming from the City of Syracuse; and
- the Upper Susquehanna River Watershed, with significant support for CCE of Chemung County coming from the Upper Susquehanna Coalition. The success of applying Home*A*Syst in the Skaneateles Lake

Watershed has convinced the City of Syracuse to commit funding to pilot the assessment procedures for small water system operators and the resource information technologies-based education on nonpoint source and watershed management in the Skaneateles Lake Watershed.

Clearly, core funding has lead to enhanced education and water quality protection in NYS and the loss of the dedicated funding will be difficult to offset.

While it is important to encourage innovation, it is critical to improve and strengthen existing programs and build upon past investments. Investments should not focus solely on developing new initiatives - but should support improving existing programs and partnerships. In the future, water quality funds must be made available through 3d. For the coming year, implementation of Section 406 must contain enough flexibility to support core extension programs. I strongly urge that you give due consideration to these views, and I thank you for the opportunity to provide them on this very important issue.

Cc: Congressman Maurice Hinchey
Congressman James Walsh
Congressman Sherwood Boehlert
Senator Charles Schumer
Senator Daniel P. Moynihan

Name: Michael J. Tate, Associate Dean and Director, Cooperative Extension & Edward B. Adams, Agriculture and Natural Resources Program Leader
Organization Representing: Cooperative Extension, Washington State University – Spokane, 668 North Riverpoint Blvd., Box B, Spokane, WA 99202-1662
Telephone: (509) 358-7960; TDD 1-800-833-6388
Fax: (509) 358-7900

MEMORANDUM

TO: Ms. Terri Joya

FROM: Michael J. Tate, Associate Dean and Director, Cooperative Extension
Edward B. Adams, Agriculture and Natural Resources Program Leader

DATE: December 15, 199

SUBJECT: Integrated Research, Education, & Extension Competitive Grants Program Section 406

UNITED STATES
DEPARTMENT OF AGRICULTURE

Comments

Washington State University (WSU) submits the following as written stakeholder comments regarding the Integrated Research, Education, and Extension Competitive Grants Program authorized under section 406 of the Agriculture Research, Extension, and Education Reform Act of 1998. WSU has conducted outstanding programs using the section 3(d) funding that this grants program will replace. We look forward to working with the new program.

To that end, WSU feels that the RFP that USDA/CSREES will generate should address the following issues:

Issues Pertaining to General 406 Priorities and Administration:

- USDA should manage the 406 funding to allow the included programs to address critical emergency issues as they develop. Natural disasters, pest outbreaks, changes in registrations and outbreaks of food-borne illnesses cannot be predicted. In the past, 3(d) funding had the flexibility to respond to emergency issues. Grant funding tied to specific outcomes will lack this flexibility. Either some funding will have to be held back centrally or be placed in regional centers.

- The RFP should define integration across the national program, not individual projects. The focus of the proposals should be on outcomes. States and regions develop appropriate local themes. The RFP should provide flexibility in definition of "region." Consider "SARE" style structure of regional centers for local priority setting.

- The RFP should encourage multiple year funding. The complexity of the programs funded by 406 demand a multi-tactic, multi-year approach. Only a multi-year funding cycle, such as 3-5 years, will provide the necessary flexibility to the program.

- Peer review panels need to reflect the diversity of research, extension and education applicants applying for funding.

- Under-served minorities should be reached with this program.

Water Quality Issues:

- The RFP should reflect the goals listed within the 1997 National Water Quality Plan.

- The RFP should include water policy as an issue. We cannot address quality without considerations of quantity, especially in the West.

- The RFP needs a mechanism to consider the existing one-Year-old 3(d) projects if they are or can become integrated. This should include the continuation of FAS/HAS projects funded last year.

Pesticide Impact Assessment Issues (PIAP):

Dr. Catherine Daniels testified on our behalf at the December 2, 1999, stakeholders meeting; therefore, our comments related to PIAP are on record.

Food Safety Issues:

The US food supply continues to evolve from one that provided consumers with minimally processed basic commodities to the current system of highly processed foods that are either ready-to-eat or require minimal preparation in the home. Thus, food safety research, education, and extension are continually in a state of flux due to the continuing evolution of the food supply as well as increased knowledge of food-borne pathogens.

WSU's team of food safety researchers and extension educators has worked together for more than 10 years. We welcome the opportunity under the Integrated Research, Education, and Extension Competitive Grants program to seek funding for some of our common interests.

Because we have developed a strong research/education/extension team, we have some insights into the strengths of the Integrated Competitive Grants Program as well as knowledge of some of the areas where caution is needed. Following are our suggestions:

- Food safety education should be research-based. We suggest that research be seen as both: (1) laboratory or other background research to collect information needed for an educational program, and (2) evaluation research to assess the results of an educational program. Sometimes, much of the research data already exists to implement an educational program and the primary research need is to conduct an outcome evaluation. Other times the necessary data and information is incomplete.

- We suggest that extension and applied research funds be allocated with some flexibility to allow the quick development of applied research in order to meet emerging needs for food safety information. Frequently, educators face the situation where the necessary information is not readily available or is incomplete. Sometimes, the information can be garnered from a review of the published literature. Often, applied research is necessary to generate useful information.

For example, presently there is a strong demand for methods to grow and market safe sprouts; however, the current information is incomplete. For the sprout industry to survive, applied research on safe sprout production must be implemented now.

- We suggest that the funds be allocated in such a way that if a need arises that requires research and/or education, at least a portion of the food safety funds can be shifted to meet the unforeseen needs. Continuation of the Plan of Work grants is an excellent way to assure that Cooperative Extension retains the flexibility to respond as needed. Food safety extension education may need to be developed rapidly to respond to a local or national situation that was unforeseen when funding applications were submitted.

For example, in 1997 the Centers for Disease Control and Prevention identified the source of an outbreak of *Salmonella* Typhimurium DT104 in Yakima County, WA as a fresh cheese (queso fresco) made with raw milk. Within a few weeks after the source of the outbreak was identified, WSU researchers developed a recipe for home production of queso fresco made with pasteurized milk. The network of WSU extension food safety educators responded with a successful intervention. USDA Food Safety and Quality Plan of Work funds and funds from the Washington Dairy Products Commission were used for the training of Hispanic grandmothers to make the WSU recipe. The outcome was that in a few months the incidence of salmonellosis rapidly decreased. The primary research data that we collected was the impact of the intervention. The design and evaluation of the intervention were published in peer-reviewed articles in the American Journal of Public Health and the Journal of the American Dietetic Association. The project has received awards from USDA and the State of Washington. We were able to quickly develop the safe cheese workshops because we had a broad-based FSQ Plan of Work grant proposal, which allowed us flexibility in allocating funding to respond to the need.

- We suggest that the RFP define extension education in terms of a variety of educational programs conducted bv Cooperative Extension. Cooperative Extension food safety education is targeted to a variety of audiences. This would include education for professionals, food producers and processors, regulators, train the trainers, youth education, consumer education, volunteer programs, internships, and science-based school projects.

- We suggest that the RFP link research and education somewhat loosely. Research projects should be of an applied nature, with the goal of implementation of findings (but perhaps not within the timeline of the grant). In addition, research should not be funded unless the recipients of the grant have a plan to disseminate the findings when the research is completed.

Food safety research frequently leads to changes in current guidelines included in food safety publications. However, the link between research and application of research findings may take years to develop.

For example, WSU researchers have been conducting research for more than 5 years on ways to decrease E. cold 0157:H7 colonization of cattle. This research has not yet yielded results that can be used in an extension educational program for livestock producers.

Thank you for allowing Washington State University the opportunity to provide stakeholder comments regarding the Integrated Research, Education, and Extension Competitive Grants Program authorized under

section 406 of the Agriculture Research, Extension, and Education Reform Act of 1998. Should you have any questions, please do not hesitate to contact me.

Name: Keith L. Smith
Organization Representing: Ohio State University Extension, Office of the Director, 2120 Fyffe Road, Columbus, OH 43210-1084
Telephone: (614) 292-4067
Fax: (614) 688-3807

December 16, 1999

Dr. Charles Laughlin
Administrator
USDA-CSREES

Dear Dr. Laughlin:

Comments Regarding Implementation of Section 406 of The Agricultural Research, Extension and Education Act of 1998

As USDA-CSREES prepares to implement Section 406, I want to express several concerns that need to be addressed in the final guidance and rules. Ohio State University Extension has made very effective use of the funds that were previously disbursed under the 3(d) budget lines for food safety, pesticide impact assessment, and water quality. We have used the funds to expand our programs by hiring outstanding educators who are capable of delivering relevant and timely programs to various clientele groups. Thus, my first concern is the budget hardship that is being imposed on this, as well as other, state Extension systems with the immediate elimination of the 3(d) lines. In light of that, I strongly encourage you to develop a mechanism in the Section 406 process to ease that hardship by providing a transition year. This transition is also important for program adjustments. Many of my program leaders are concerned about the impact this will have on clientele, as well as the poor image it will create for us due to major reductions in programs caused by a federal budget problem. We, in the states, will bear the brunt of clientele dissatisfactions, even though the cause originates with the federal partner.

Secondly, I am concerned about the ability of CSREES to truly integrate research, extension and education into the targeted programs. For the desired integration to occur, it will be incumbent on CSREES to provide balanced review panels. Research projects, extension programs, and university curricula are planned, executed, and evaluated differently, and it will take a well-represented panel to deal with that. Unless the review panels have proper representation, the desired integration will suffer. Related to this is the question

of how the Section 406 programs will be managed. We are very concerned that the inclination will be to assign Section 406 to the NRI. If this were to occur, CSREES runs the risk of funding basic research which is not the intent of the integrated program, and has very little immediate relevancy to the Extension clientele who participate in our programs.

Thirdly, special consideration should be extended to the water quality program that was funded through the competitive process last year. Multi-year program plans were developed under the guidance issued by CSREES and the expectation was created, whether intended or not, that solicitation of multi-year projects indicated a multi-year commitment by CSREES. Ohio State University Extension submitted four proposals, all of which were judged to be worthy of funding:

- Ohio NEMO (Nonpoint Education for Municipal Officials) - The Ohio version of a national program developed by University of Connecticut, and which was intended to serve as a model that could be replicated by other states.

- Ohio Farm*A*Syst - Another national program that has been adopted by Ohio.

- Ohio Watershed Network - CSREES funding of $66,000 has resulted in this educational program network leveraging an additional $120,000 here in Ohio.

- Agricultural Water Quality BMPs in Amish Communities - This novel effort has demonstrated that this under-served, minority audience can and will adopt agricultural practices to restore and protect water resources.

These programs, and others like them across the country, that were funded for an initial twelve month period are now poised to begin making significant impacts with clientele. To terminate them at this point would be a waste of the initial twelve-month investment by CSREES. CSREES needs to develop a mechanism in the Section 406 process whereby these competitively funded programs are subjected to a merit review based on progress to date and likelihood of achieving their program goals. In addition to sacrificing the achievements of these programs, Ohio State University Extension would be forced to either terminate the projects which would result in the layoff of 3.0 FTE's of Extension educators or face the difficult task of finding other sources of funding in the middle of the state's biennium budget.

Finally, Section 406 implementation procedures should accommodate the ability of Extension to respond with educational programs in emergency situations. The cumbersome paper process of issuing RFP's, receiving proposals, evaluating them and making awards will make Extension systems, such as Ohio State University Extension, ineffective in serving clientele when natural disasters strike. I strongly encourage CSREES to develop a mechanism, competitive as it may need to be, that will enable us to be immediately responsive to the needs of our clientele.

In closing, I would add that we are having serious discussions here at Ohio State University about the role of the land grant university in the 215t century. Our President, Dr. William Kirwin, has challenged our entire university community to be engaged with the community at large, and to be relevant and responsive. If we, in OSU Extension are to accomplish that, in partnership with USDA-CSREES, it is imperative that Section 406 be implemented in a manner that enables state Extension systems, such as Ohio State University, to develop and deliver educational programs to help clientele solve problems in a timely and practical manner.

/s/
Keith L. Smith,
Associate Vice President, Agricultural Administration and
Director, Ohio State University Extension

cc: Dr. Steve Baertsche, Assistant Director, Agriculture and Natural Resources
Dr. Eric Norland, Program Leader, Natural Resources

Name: Michael D. Smolen, Chair, National Advisory/Leadership Team
Organization Representing: Oklahoma State University, Division of Agricultural Sciences and Natural Resources, Department of Agricultural Engineering, 218 Ag Hall, Stillwater, Oklahoma 74074-6016
Telephone: (405) 744-8414
Fax: (405) 744-6059
E-Mail: smolen@okstate.edu

December 16, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, STOP 2240
1400 Independence Avenue, SW
Washington, D.C. 20250-2240.

Dear Ms. Joya:

Attached please find three items to be entered as part of our comments on Section 406.

1. Letter from Michael D. Smolen to Charles Laughlin,
2. Comments from the National Advisory/Leadership Team, and
3. The Strategic Plan for Extension Water Quality Program.

Thank you for your assistance.

Sincerely,

/s/
Michael D. Smolen, Chair
National Advisory/Leadership Team

* *

December 16, 1999

Dr. Charles Laughlin, Administrator
Cooperative State Research and Extension Service
305 A Whitten Building
U. S. Department of Agriculture
Washington, DC 20250

Dear Dr. Laughlin:

Attached are comments, which along with this letter, will be submitted by the National Advisory/Leadership Team (NA/LT) to Competitive Research Grants and Awards Management, relative to the Section 406 RFP. As explained in the attachment, the NA/LT represents the Extension Water Quality Program and its network through the 1862, 1890, and 1994 land grant institutions.

The attached comments focus on the RFP for the 406 Program. They do not address our concern that operating the water quality program through competitive grants will devastate the National Extension Water Quality Program. Many concerns have been raised, but I would particularly like to share the following two.

Our first concern is that the transition from base funding to competitive will be extremely painful and will result in a loss of professional capacity for water quality education in the system. Many of the professionals and paraprofessionals that we have trained in the past few years are in jeopardy of losing their jobs. The uncertainty associated with competitive funding and the delay this new system will impose will result in many people leaving their water quality programs and, in some cases, the Cooperative Extension System.

For this reason we are seeking your assistance in identifying a mechanism for transitional funding to minimize the loss of these professionals.

Our second concern addresses the loss of base program funding from Smith-Lever 3(d). In this program states received a formula allocation of about $60,000 per year. This small amount was immediately doubled

due to the match requirement and extended further in most states by leveraging with other grant sources. On average the funding produced an equivalent of more than $200,000 per year for public education on water quality. We feel there should be more concern for loss of Program capacity due to this direct and indirect loss of funding.

We support the concept of integration of research, education and extension, but we feel it should not be accomplished at the expense of an on-going, effective Extension Water Quality Education program.

Sincerely,

/s/
Michael D. Smolen, Chair
National Advisory/Leadership Team

cc: Ms. Terri Joya

* *

Comments on the Implementation of Section 406
Of The Agricultural Research, Extension and Education Act of 1998

by

Michael D. Smolen, Oklahoma State University, Southern Region and Chair
Eric R. Norland, Ohio State University, North Central Region
Roy Jeffrey, University of Connecticut, Northeast Region
Asmare Atalay, Virginia State University, 1890 Institutions
Jim Hafer, Dull Knife Memorial College, 1994 Institutions
Chris Feise, Washington State University, Western Region

The National Advisory/Leadership Team
Representing

The National Network of Extension Water Quality Coordinators

December 17, 1999

Comments below are the follow-up and expansion of comments presented, by Eric Norland at the 406 Stakeholder Session December 2, 1999, on behalf of the National Advisory/Leadership Team (NA/LT). The NA/LT represents the leadership for the national network of Extension Water Quality Coordinators,

appointed by Extension Directors and the CSREES National Program Leader for Water Quality. Individual Team members represent each of the Extension Regions and the 1890 and 1994 land grant institutions

Our comments represent the concerns and ideas common to the Extension Water Quality Coordinators in each of the states and territories. Individual states, territories, and regional groups will be sending in their own comments to establish their own views on many of the same issues.

We support the concept of integration of research, education and extension, but we feel it should not be accomplished at the expense of an on-going, effective Extension Water Quality Education program.

Before we present our recommendations, however, we would like to establish the definitions of research, extension, and education that should be used in the Section 406 Program.

Extension - a deliberative teaching-learning process whereby non-formal and formal education programs are developed, based on the needs, concerns, and problems of clientele. Programming is done with clientele, not for them, and program development is a continuous process. Extension programming incorporates evaluation throughout the process to determine desired outcomes and how well they were achieved.

Research - In the context of Section 406, research should be applied research, where research questions are derived from the needs and problems of Extension clientele and where the new knowledge gained has a direct application to the end users. Applied research may build on basic research, but Section 406-funded research should be directed toward application of results.

Education - Education, for the purposes of Section 406, is considered to be those teaching-learning settings that are developed and delivered in formal coursework at accredited universities where academic credit is earned for the work completed by students and those credits applied to baccalaureate and graduate degrees

We have eleven recommendations, presented below with justifications.

Recommendation 1: The goals of the Extension Water Quality Strategic Plan, *"Education, Empowerment, and Involvement – Safe Rural Drinking Water and Minimizing Agricultural Pollution ",* be adopted as the guidance for the Section 406 Water Quality Program.

Justification: This Strategic Plan (see attachment) was developed in 1997 when USDACSREES called together a working group of State Extension professionals and USDA-CSREES Water Quality Team members. The Plan has seven comprehensive goals, which are paraphrased below:

- Reaching under-served audiences

- Educating the public about watersheds and aquifers
- Preventing pollution through use of best management practices
- Educating public policy makers to improve decision making
- Promoting individual actions to protect water quality
- Promoting volunteerism
- Developing partnerships and liaisons with other agencies and organizations

The Water Quality Strategic Plan was enthusiastically and widely supported both when it was introduced in 1998 and when it was reviewed by Water Quality Coordinators from 49 states and two territories at the National Extension Water Quality Coordinators Conference in October 1999. This plan is a comprehensive approach to restoring and protecting the nation's water resources and should be the document that provides the direction for the Section 406 Water Quality Program.

Recommendation 2: Integration should be applied to the overall program rather than to each project.

Justification: The National Advisory/Leadership Team does not believe it was the intent of Congress to impose a program structure requiring each project to have three-way integration, research, extension, and education, regardless of whether or not it is feasible or appropriate. Rather, we believe it was the intent of Congress to promote integration and coordination of effort across the national program. We recommend that carefully targeted, applied research be integrated with extension and formal education efforts to obtain an overall integrated program.

Recommendation 3: Research should be limited to applied research that is carefully targeted to support the goals of the strategic plan.

Justification: A sound extension education program employs the findings from applied research, interpreting the results for lay audiences. Although basic research is an important first step in the discovery of new knowledge, it cannot generally be used directly. Research under 406 should be focused to the needs of the extension and education programs. Other avenues exist to fund basic research, such as the National Research Institutes (NRI).

The integration of extension and education with research under 406 gives an opportunity for information needs to drive research in a very practical way. Research could be targeted to answer some of the more persistent, but less exciting questions such as how to apply basic concepts to specific situations. Many times research can be piggybacked onto education and demonstration efforts at reasonable cost. This should be encouraged. If research is not focused, its cost could overwhelm the program.

Recommendation 4: All Proposal review panels must be balanced to include extension, education, and research professionals.

Justification: To ensure selection of projects suitable for the integrated program, all review panels must be balanced with individuals with professional experience in each area. Extension programs, research projects, and university curricula are planned, conducted, and evaluated differently. Each has its own model and should not be expected to fit into the model, or mold, of another. It is particularly difficult to assure that reviewers understand that an Extension educational program entails more than preparation of fact sheets and popular reports after a research project has been completed. Rather, it is an educational process characterized by an appropriate mix of non-formal and formal education in settings that involve learners in all phases of the program.

Establishing panels with suitable Extension presence may be difficult due to conflict of interest concerns. Most Extension professionals with interest in Water Quality are likely to have submitted projects or to be close colleagues of those who have submitted.

Recommendation 5: **Water quality programs for under-served and minority audiences must be maintained.**

Justification: The National Water Quality Strategic Plan had the goal of addressing the educational needs of minority/under-served audiences as its first priority. Health concerns and environmental justice considerations as well as unique educational needs were considered extremely important. The NA/LT recommends strongly that this priority be maintained in the 406 program. We further recommend that 406 consider developing and using the program capacity of 1890 and 1994 institutions in partnership with 1862 land grants to ensure that the needs of these audiences are met. Although this priority has been in place only since FY98, there has already been substantial progress through partnerships of 1862 and 1890 Land Grant Institutions. We recommend this history of performance be considered in the RFP.

Recommendation 6: **Emergency response capability must be maintained.**

Justification: The Section 406 Water Quality Program must provide a mechanism to address critical emergency issues as they develop. Of all the functions and capabilities that could be lost due to the failure to fund the 3(d) budget line, the ability to respond in a timely manner to emergent issues and problems is the most serious. In the past, Extension has responded rapidly and made a difference during the *Pfesteria* outbreaks in the Albemarle Sound and Chesapeake Bay, during the Mississippi River floods of 1993, and during the Hurricane Floyd-induced flooding in North Carolina, where widespread animal manure pollution occurred in rivers and estuaries. All of these disasters involved waters of national significance, and thus justify a federal funding mechanism.

Recommendation 7: **Projects that support the overall water quality extension program such as Project NEMO, Farm*A*Syst/Home*A*Syst, Give Water a Hand, and the Extension Water Quality Database should be included in the 406 Program.**

Justification: Projects of National Significance" were identified as an important component of the water quality program in the Strategic Plan. These projects provide a service such as development of risk assessment materials in the case of Farm*A*Syst/Home*A*Syst and applications for GIS in public education in the case of project NEMO (Nonpoint Source Education for Municipal Offficials). Although many institutions could develop their own concepts and materials, the national program will be far more productive if resources are focused to specific locations charged with development and training on these concepts. In the case of Farm*A*Syst/Home*A*Syst, Congressional intent is clear in the appropriation language.

To make the most effective use of Farm*A*Syst/Home*A*Syst programs, we recommend that the Farm*A*Syst National Office be funded to provide input to the project selection process. This would assure continuity and optimal performance of funded projects.

Recommendation 8: **Projects should be funded for the expected duration rather than one year at a time.**

Justification: The history of CSREES-USDA in funding water quality projects has been plagued by problems because actual duration of projects and their funding were uncertain. It is very difficult to train and keep professional staff to work on water quality projects under such conditions. A clear funding horizon is also important for effective administration of projects.

Recommendation 9: Selection of projects for funding under 406 should not be placed in the NRI (National Research Institute).

Justification: The NRI would not be the appropriate agency to oversee 406 because neither extension nor education nor the applied research that we are recommending fits the mold of basic research.

Recommendation 10: Give higher priority to existing water quality projects awarded competitively in FY99.

Justification: During FY99, water quality projects funded under Smith-Lever 3(d) were awarded on a competitive basis. Most of these projects were planned on a multi-year basis, and most have been successful in meeting the objectives of the national water quality program. Where possible, land grant universities are likely to fold these projects into new projects that meet the guidelines of 406. The RFP should encourage this and award them priority if they were meeting the objectives of the water quality program and can show their connection to 406.

Recommendation 11: **Allocate up to twenty-five percent of funds for regional projects that can support the basic capacity of extension and education personnel in their region.**

Justification: The national water quality program of land grant universities with CSREES as partner has a

track record of providing effective unbiased education to all residents of all states and territories. This program has been supported by a network of nonpoint source coordinators supported cooperatively by their land grant institution and CSREES. Regional networks have developed that draw on the resources and disciplines of cooperating institutions in different states. This provides an efficient mechanism for sharing expertise and reaching the public without requiring each institution to develop its own materials and expertise. Regional networks can support training for staff development and resource sharing as has been done in the Southern Region (VA, NC, SC, GA, FL, AL, TN, KY, MS, LA, OK, TX, VI, and Puerto Rico) since 1989.

We recommend that funds be designated to support program staff development, resource sharing, regional and multi-state workshops on a regional basis.

* *

Strategic Plan for WQ

Education, Empowerment, and Involvement

SAFE RURAL DRINKING WATER AND MINIMIZING AGRICULTURAL POLLUTION

STRATEGIC DIRECTIONS FOR THE WATER QUALITY EDUCATION PROGRAM: FY 1998 AND BEYOND

January 1998

Renewing the Water Quality Education Program

PRINCIPLE

The Cooperative Extension System (the 50 State Partners and the Cooperative State Research, Education, and Extension Service [CSREES-USDA]) subscribe to the principle that:

All communities, regardless of economic status, should have access to educational programs that empower them to understand risks posed by water quality problems, and to take action to protect or improve water quality or both in order to forestall, reduce or eliminate those risks. Access to safe drinking water, or to the information to acquire safe drinking water, is a basic right of every citizen.

MISSION

To provide leadership in extension education through the Land-Grant System to enable individuals, industry and government to effect changes that enhance and protect the nation's water resources for the public good.

UNITED STATES
DEPARTMENT OF AGRICULTURE

VISION

To be recognized as an important and effective partnership providing leadership for water quality education to help people, industry and governments prevent and solve current and emerging water quabty problems.

EMPHASES

- Under-served audiences
- Watersheds and aquifers
- Surface water systems
- Public policy
- Individual actions
- Volunteerism
- Partnerships

The CSREES Water Quality Education Program, begun in 1990, was predicated on the need to prevent water contamination from agricultural chemicals. While local problems still exist in this arena, public focus has shifted to other areas. Hypoxia, pfiesteria, and cryptosporidium, examples of harmful algal blooms and debilitating infections, were not in the general water quality jargon of the early 90's. Today they are major concerns. Issues of *salinity* and the maintenance of *in-streamflows* have risen in prominence. The success of the program has developed an awareness of the needs of under served communities; they deserve attention.

The program has been re-classified, by the Extension Committee on Organization and Policy, from a National Initiative to a base program. In fiscal year 1997, a budget reduction mandated some changes.

This strategic plan was developed throughout 1997, by a steering committee and a 4-day Water Quality Program Workshop. Participants are listed in the Appendix. It has been widely circulated within the Cooperative Extension System. This plan represents the intentions of the State and Federal partners, and presents new goals and an updated structure for a re-directed program. The presentation order does not imply relative priority.

Implementation is subject to the availability of appropriations.

Goal 1

Increase the delivery of education programs about water quality, water-related health risks, and water and waste treatment systems in under-served communities.

Background

The protection of drinking water quality knows no ethnic or economic boundaries. All drinking water resources, whether rural or suburban, need adequate protection regardless of the community's economic status.

Most under-served communities have very limited resources for drinking water protection, wellhead protection, disinfection, upgrading community water treatment facilities, fixing sewer lines, or handling storm water discharges. Many homes in under-served communities contain plumbing that may release toxic elements into the drinking water.

Educational materials and programs are sorely needed in such communities. These can be developed and delivered by effective cooperation among the members of the Land Grant System, including the 1890 and 1994 institutions.

Such programs will enable disadvantaged audiences to directly and equitably participate in water quality decision making processes for their own communities.

Objectives

Increase collaboration among 1862, 1890, and 1994 land-grant institutions and those in U.S. territories on water quality issues.

Provide necessary leadership and funding to develop effective water quality programs in the total Land Grant System.

Develop targeted water quality educational materials for economically disadvantaged audiences.

Empower under-served and limited resource communities to become involved in water quality decision-making processes for their own communities.

Increase the delivery of water quality education programs to under-served rural and suburban audiences.

Goal 2

Develop and deliver education programs that teach the hydrologic functions and the dynamics of watersheds and aquifers, enabling landowners and policy makers to protect the quantib and qualib of the Nation's water resources.

Background

The quality and quantity of the nation's water resources are affected by characteristics of the land; by Federal, State and local policies; and by the actions of people who live, work, or visit the watershed or aquifer region.

Streams, rivers, lakes and aquifers are recharged as water moves through the watershed. In the process, surface flows accumulate contaminants that result from various land use (e.g., agriculture, urbanization) and natural resource management (e.g., mineral extraction, forestry) activities. As surface water moves through the soil in the aquifer recharge process, contaminants may be carried into the groundwater. Human activities (e.g., agriculture, forestry, urbanization) create the pathways (mechanisms) through which quality and quantity are affected.

Management policies and site-specific practices are necessary to protect both the quality and quantity of water resources.

Increasing the public's knowledge of watershed and aquifer processes and interactions will allow them to make rational decisions concerning watershed and aquifer management and protection.
Increasing the public's knowledge of water quantity issues such as supply, conservation measures, allocations, and projected needs will allow them to participate in the formulation of rational policies and practices.

Objectives

Increase public knowledge of the water cycle, of hydrology and of the interrelationships between humans and the environment.

Encourage the concept of natural watershed boundaries or aquifers as the appropriate context (scale) for assessing water resource conditions.

Encourage individual responsibility as the appropriate means for improving or protecting water quality.

Facilitate the adoption of best management practices for resource management activities.

Facilitate the adoption of water conservation techniques.

Increase public involvement in decisions relating to use and protection of water resources wi~in ~e watershed.

Goal 3

Increase the public's knowledge of pollution prevention control systems and of personal actions

that they can employ to conserve and protect stream systems.

Background

The term Stream system encompasses the attributes and interactions of streams, wetlands, estuaries, bays and oceans. The focus is broader than just water quality or pollution control; it seeks to develop appreciation of surface water biology, chemistry and physics and their internal interactions and external effects as a basis for understanding, conservation and protection.

Public education about the workings and characteristics of surface water systems, the impact of human activities, and practices to mitigate, minimize, or eliminate such impacts will be important components in Extension education programs. Such programs will foster the use of water quality - oriented Best Management Practices, and the use and effective maintenance of household waste systems; and will encourage the adoption of personal practices that protect and enhance the environment.

Objectives

Increase public understanding of the characteristics and importance of lakes, streams, wetlands, estuaries, bays, and oceans, including their role within a watershed.

Increase public knowledge of the impact of human activities on the health and sustainability of aquatic ecosystems, and how these activities affect water quality and quantity.

Increase public knowledge of individual and collective actions that can be taken to protect, manage, or enhance stream systems.

Educate the public about stream system problems such as hypoxia in the Gulf of Mexico and other water bodies.

Educate natural resources-based business and industry, such as agriculture and forestry, about the design and use of BMPs to protect stream systems.

Goal 4

Increase public understanding and involvement in community decision-making and in the creation of public policy on water resources issues.

Background

Protection of local watersheds and aquifers often requires community-based actions. Decisions about land

use, waste water management alternatives for areas without sewers, storm water controls, and the protection and restoration of riparian zones are just some of these actions.

The Land Grant System can provide a common base of knowledge to support communities grappling to formulate public policy strategies that allow for community growth while protecting the water resource.

Education programs must include new tools and techniques (i.e., Geographic Information Systems, remote sensing, economic analysis, and world wide web technologies) to strengthen awareness of the water quality impacts of current and proposed land use activities by both community decision-makers and individual property owners. These tools can also be used to target specific problems and locations in need of additional attention.

The Land Grant System can provide education and demonstrations regarding land use strategies, site design considerations and the various pollution prevention and abatement techniques, such as storm water "best management practices." As divergent viewpoints arise, the Land Grant System can encourage dialogue and resolutions that are tailored to the unique attributes of the community.

Objectives

Provide leadership in empowering citizens to identify and address critical water quality issues in specified watersheds.

Assist communities to develop water quality and quantity goals and to incorporate them into community "vision" statements.

Facilitate the development and use of community-based environmental assessments and problem assessment tools.

Facilitate efforts to target community water goals and planning to meet specific objectives.

Promote the development of watershed partnerships of all stakeholders as grassroots voices to generate support and resources.

Increase the ability of local officials to access government and non-government agency expertise about water management.

Goal 5

Develop and deliver educational programs that enable individuals to safeguard their own drinking water.

Background

Water is essential for life. No other single substance is as important for our health, our economy, or our way of life.

Most Americans take for granted the safety of their drinking water, whether it comes from a well or a municipal treatment plant. However, water supplies are sometimes contaminated beyond the limits of safety. This is of particular concern for private (non-regulated) supplies.

Households need to be concerned about the quality of their drinking water, the associated health effects and risks, and what can be done to safeguard the water supply.

For example, there have been high levels of nitrates and bacteria and outbreaks of cryptosporidium in our water supplies over the past few years. Lead, particularly harmful to children and pregnant women, can enter drinking water from plumbing that contains lead.

Knowledge and use of improved methods of testing water can reveal threats to human health. Educational programs will help consumers to assess the quality of their drinking water, and to understand the costs and benefits of pragmatic corrections.

Objectives

Increase citizen awareness of the quality of their drinking water.

Increase citizen and local official awareness of the importance of proper well design, construction, and maintenance and testing to insure drinking water quality.

Increase understanding of the functions and effectiveness of tap water alternatives and of home water treatment systems.

Increase community based drinking water screening and awareness programs.

Increase public awareness of the options to safeguard drinking water quality.

Increase the use of environmentally benign household products.

Goal 6

Promote youth and adult volunteers' involvement in protecting and enhancing the quantity and

quality of the nation's ground and surface water.

Background

Youth programs and volunteer programs are hallmarks of the Extension System. They multiply the effectiveness of the System's educational delivery system.

Since water is a part of everyone's life, citizens from all sectors of society have roles to play. Water issues provide an excellent basis for involving youth and adults in local environmental management and policy development.

Research on educational approaches to behavioral change has shown that people will adopt new behaviors when given a chance to practice new skills and to receive recognition for the positive impact of their contributions.

Volunteer monitoring, Home*A*Syst, Farm*A*Syst, and Give Water a Hand are examples of Extension programs that involve youth and adult volunteers, and that recognize the positive impact of their behavior choices. These programs also contribute to an increase in community partnerships and networks to develop solutions to particular concerns identified through the programs and in response to increased citizen awareness of local issues.

The result will be more citizen involvement, wider dispersal of information, and more rational analysis of environmental decisions in the community and the nation.

Objectives

Increase opportunities for youth and adult volunteer involvement in activities such as citizen monitoring.

Provide training opportunities to enhance the quality of youth and adult volunteer contributions.

Increase the abilities of volunteer groups to apply their findings and data to improved community water management strategies.

Increase the identification of, and opportunities to link, community groups and agencies with similar

Facilitate local discussions to assure that volunteer activities relate to community water goals and values.

Goal 7

Develop and maintain partnerships for more effective and sustained solutions to long- term water

quality and quantity issues.

Background

Stewardship of the nation's water is everyone's concern. Numerous agencies and groups are actively engaged in improving water quality.

Collaboration and cooperation with entities such as the U.S. Environmental Protection Agency, the USDA Natural Resource Conservation Service, and Farm Service Agency, U.S. Geological Survey, State Soil and Water Conservation Commissions and Districts, State Departments of Agriculture and/or Environmental Quality, State Water Resource Institutes, and state and local commodity groups, will provide a more rational approach to addressing water quality issues.

The Land Grant System can take the lead in initiating forums for multiple parties to resolve water quality/quantity and other environmental issues. The Land Grant System can initiate collaborative research and education efforts to achieve results.

Objectives

Establish formal liaisons with Federal and State water quality agencies and other appropriate organizations and agencies.

Facilitate community action to assess local problems, identify solutions, and obtain funding to implement programs.

Develop collaborative educational programs to facilitate balanced and effective solutions.

Build a cadre of skilled educators/ facilitators to engage the multiple interests in community based decision making on water quality and quantity matters.

Facilitate identification of and collaboration among stakeholders interested in particular topics.

Proposed Structure - Partnership and Shared Responsibility

National Advisory/Leadership Team(NA/LT)

Federal: A designated CSREES Water Quality Program Leader will coordinate with other Federal agencies, provide program leadership, be a program advocate, and serve as Executive Secretary of the NA/LT.

State: Four members, representing each geographic region, and one each representing the 1890 and 1994

Land Grant Institution. Members will represent the diversity of the Cooperative Extension System, and will serve three-year staggered terms.

Operation: The Water Quality National Program Leader will have an operating budget for the NA/LT, for printing, and for evaluation projects.

Charge: The NA/LT will develop RFPs, coordinate programs, review plans and accomplishments, and communicate with State and Federal counterparts.

State Water Quality Program Support

State programs will be based on approved plans of work, evaluated by a peer process. Only one plan of work may be submitted per State. Joint programs between 1862's and 1890's (or 1994's) (or among all three) must submit a joint plan of work.

Preference and budget supplements will be given to joint projects, especially those that address Goal 1 (IJnder served audiences).

Competitive/Cooperative Projects

Funds from HUA, DEMO, MSEA, and Estuary programs will be used for *new cooperative projects* as they become available.

Project selections will be based on an RFP and selected competitively by a peer review process.

Projects will operate under Cooperative Agreements that assure involvement of the Federal partner.

Program Goal Centers

Centers will have an advisory committee and significant involvement of a Federal partner; will utilize state communication teams; will participate in Project evaluations.

They will also track state progress on one or more goals, assemble materials to support activities relating to goals, and prepare publications to market the results at state and National levels.

Centers will be selected competitively, and will be funded by Cooperative Agreements for three years.

Program-Significant Projects

Projects that contribute to the entire program may be funded. Selections will be made by the NA/LT, and

funded by Cooperative Agreements. Current examples include Farm*A*Syst, WQ Database, and NEMO.

Multi-State Liaisons

CSREES will cost share with coalitions of States to provide liaisons to EPA Regional Offices, or to other appropriate organizations.

* **NOTE:** the Kansas City group recommends that Federal rules be revisited to fund 1890s directly.

APPENDIX

List of Attendees

Jim Anderson*	University of Minnesota	St. Paul, MN
Jim App	University of Florida	Gainesville, FL
Asmare Atalay	Virginia State University	Petersburg, VA
Sam Bass	South Carolina State University	Orangeburg, SC
Claude Bennett	USDA/CSREES/PAS	Washington, DC
Peter Bloome	University of Illinois	Urbana, IL
Greg Crosby	USDA/CSREES/NRE	Washington, DC
Chris Feise	U.S. EPA Region 10	Seattle, WA
Mike French	University of Arkansas	Little Rock, AR
Cynthia Garman-Squier	USDA/CSREES/NRE	Washington, DC
Art Gold*	University of Rhode Island	Kingston, RI
James Hanson	University of Maryland	College Park, MD
Dianne Harmon	USDA/CSREES/NRE	Washington, DC
Maurice Horton	USDA/CSREES/NRE	Washington, DC
Frank Humenik	North Carolina State	University Raleigh, NC
John Impson*	USDA/CSREES/PAS	Washington, DC
Roy Jeffrey	University of Connecticut	Storrs, CT
Gerald Larson	USDA/OBPA	Washington, DC
Darnell Lundstrom	North Dakota State University	Fargo, ND
Corrinne Lyle*	University of Idaho	Moscow, ID
Bob Mahler	University of Idaho	Moscow, ID
Gerald Miller	Iowa State University	Ames, IA
Eric Norland*	Ohio State University	Columbus, OH
Ralph Otto*	USDA/CSREES/NRE	Washington, DC
Randy Ristau	Colorado State University	Monte Vista, CO
Mary Ann Rozum	USDA/CSREES/NRE	Washington, DC
Robin Shepard	University of Wisconsin	Madison, WI
Michael Smolen*	Oklahoma State University	Stillwater, OK

UNITED STATES
DEPARTMENT OF AGRICULTURE

Fred Swader	USDA/CSREES/NRE	Washington, DC
Joe Wysocki*	USDA/CSREES/NRE	Washington, FC

* Member of Steering Committee

January 1998

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http://www.reeusda.gov/nre/water/strategi.htm

Name: Jim T. Criswell, Pesticide Coordinator
Organization Representing: Oklahoma State University, Oklahoma Cooperative Extension Service Division of Agricultural Sciences and Natural Resources, Department of Entomology and Plant Pathology, 127/110 Noble Research Center Stillwater, Oklahoma 74078-3033
Telephone: (405) 744-5531
Fax: (405) 744-6039

December 15, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, Stop 2240
1400 Independence Ave., SW
Washington, DC 20250-2240

Dear Ms. Joya:

UNITED STATES
DEPARTMENT OF AGRICULTURE

This is in response to request for input on the Section 406 decision and its affect on the Pesticide Impact Assessment Program (PIAP).

I am Jim Criswell with Oklahoma State University and the state liaison for PIAP. I have worked with PIAP since 1979 and will attest the program has grown and improved since 1979 to a viable and valuable program in 1999.

One of the major points I wish to make with the proposed Section 406 competitive grant process is the difference in programs and projects. A program provides sustained activity and a constant contact person. A program also develops contacts and a resource of information over time. This is compared to a project which is usually one to three years in length and then if the project is continued the project has another person at the helm. The continuity is not the same with a project as with a program. PIAP has been a solid program and has and is providing USDA, EPA and others vital information on pesticide use and pest status throughout the United States through its state liaisons.

With the removal of sustained funding, many of the states will cease to be a valuable and reliable source of pesticide and pest information for USDA and EPA. Already, Florida has lost their PIAP person due to the uncertainty of funding, Washington is seriously considering canceling their AENews which is a valuable newsletter on Food Quality Protection Act and other pesticide related topics in the Pacific Northwest and utilized by other states including Oklahoma. Oklahoma will be reassigning the person working on PIAP because of uncertainty of funding.

This all comes when both USDA and EPA are contacting the state land grant universities for more and more information on pesticide use and pest occurrences. USDA's Office of Pest Management & Policy had started the production of Crop Profiles which PIAP personnel were coordinating within the states. Crop Profiles have become key tools in EPA's risk assessment program by reviewing the Crop Profile and assessing critical uses of specific pesticides. With the demise of continuous funding it is unlikely Oklahoma State University will be able to participate in developing or reviewing Crop Profiles.

USDA-OPMP is relying on state liaisons for assistance in addressing EPA Reregistration Eligibility Documents (REDs). Again, it appears at a critical time in production agriculture USDA is deleting a valuable resource which has developed resources to support farmers and ranchers. Examples of these efforts in Oklahoma, include our efforts with aluminum and magnesium phosphide - the major grain fumigants; ethyl parathion in the late 1988 and 1999. The PIAP liaison in Oklahoma through pesticide use surveys on commercial grain elevators, wheat, peanut and alfalfa production has provided documented information to USDA-OPMP and EPA specific pesticide use and use practices for many of the pesticides under FQPA review. The liaison's contacts within the state and throughout the U.S. have provided quicker response time to request from USDA and other groups for information. These programs and supports will very likely be lost without a sustained granting program.

UNITED STATES
DEPARTMENT OF AGRICULTURE

I would like to stress one vital point. PIAP has been a long and continuous program contact for many USDA agencies and EPA offices on pesticide use and pest information for a state. The PIAP liaison has been a constant focus point for all parties to contact for information. With the move to competitive grant process and the dissolution of the continuous contact and program, we believe it will be difficult for those seeking information to receive the same quality of information as was provided under the PIAP program. The PIAP program may not have been perfect but it has provided a constant contact point and information flow to USDA, EPA and within the land grant university.

The way to make the Section 406 process work as efficiently as before is to ensure long term support of state personnel in the process. Otherwise, USDA will be fragmenting the work and disrupting the continuity required for a viable program.

I would like to thank you for considering our comments.

Jim T. Criswell
Pesticide Coordinator

JTC/mh

cc: Sam Curl
D.C. Coston
Ross Love

Name: Michael Last, Chief of Services
Organization Representing: The Connecticut Agricultural Experiment Station
Telephone: (203) 974-8442
Fax: (203) 974-8502
E-Mail: michael.last@po.state.ct.us
Cc: John.F.Anderson@po.state.ct.us

Attached is the letter you discussed with Dr. John Anderson regarding Section 406 comments.

Thanks

Michael P. Last

* *
December 17, 1999

UNITED STATES
DEPARTMENT OF AGRICULTURE

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, Stop 2240
1400 Independence Avenue, SW
Washington, D.C. 20250-2240

Dear Ms. Joya:

I write to express my concern of the eligibility of The Connecticut Agricultural Experiment Station to compete for funding in the Integrated Research, Education, and Extension Competitive Grants Program of Sec. 406. As the Nation's first state agricultural experiment station, we are governed by an eight member citizens board and are not part of a university. I respectfully request that CSREES list state agricultural experiment stations with colleges and universities as institutions eligible to receive funding from the Secretary.

Sincerely,

John F. Anderson
Director

JFA/da

Name: Peter R. Bristow, Associate Plant Pathologist
Organization Representing: Washington State University, Research and Extension Center, Pioneer & Fruitland, Pullman, WA 98371-4998
Telephone: (206) 840-4500; TDD (1-800) 833-6388
Fax: (206) 840-4671

December 16, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
901 'D' Street, Suite 323
Washington, D. C. 20024

Dear Ms. Joya:

UNITED STATES
DEPARTMENT OF AGRICULTURE

I am writing to support the grant application from the Pesticide Information Center of Washington State University. This extremely valuable resource, until this fall, was supported by formula funds.

As a university faculty member with a portion of my appointment in Cooperative Extension, the information provided by the Pesticide Information Center is critical to me in annually revising pest management guides for several small fruit crops. When it is time to update these publications the first thing I do is search the PICOL (Pesticide Information Center OnLine) database for the crops I work with. Keeping this database current and searchable in a user-friendly manner is a huge timesaver for anyone who needs pesticide label information. When it comes to details on pesticide labels, what products are approved for used in Washington, etc. the Pesticide Information Center is THE source.

Since its inception, the Center has been a regional resource serving both Oregon and Washington. It is my understanding that the Center's current proposal requests funds to expand the regional effort to include the State of Idaho as well. This is a very reasonable addition as many research efforts are coordinated between the three states. This cooperative spirit also carries over into the joint publication of extension bulletins, etc. One example is the Pacific Northwest Plant Disease Control Handbook, which includes up to date pesticide recommendations. Annually I contribute to and review portions of this widely used handbook. Another example is Cranberry Production in the Pacific Northwest: A Commercial Guide that is in the final stage of revision and includes input from research and extension workers in .is another example of a regional effort.

Over the years, WSU and other institutions in the region have worked together to develop educational programs and information delivery systems that function well and are economical. The Pesticide Information Center does both. Without the support and information the Center provides, it would be much more difficult to do my job. I strongly urge you to fund the Center at a level that will maintain this support.

Sincerely yours,

/s/
Peter R. Bristow
Associate Plant Pathologist

Name: Carl O'Connor, Dean and Director
Organization Representing: University of Wisconsin-Extension, 601 Extension Building, 432 North Lake Street, Madison, Wisconsin 53706-1498
Telephone: (608) 263-2775; TDD (800) 947-3529
Fax: (608) 265-4545

December 15,1999

UNITED STATES
DEPARTMENT OF AGRICULTURE

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, STOP 2240
1400 Independence Ave., SW
Washington, DC 20250-2240

Dear Ms. Joya:

This letter is in response to the request for input about the administration of Section 406 of the Agricultural Research, Extension, and Education Reform Act of 1998 (AREERA)(7 U.S.C. 7626), which authorized the Secretary of Agriculture to establish a research, education, and extension competitive grant program to provide funding for integrated, multifunctional agricultural research, extension, and education activities.

Attached you will find a brief summary of impacts resulting from Smith-Lever 3(d) Water Quality Extension Special Grants in the North Central states. The availability of these funds has enabled Wisconsin to leverage funds, as much as 1 :10, to foster creative and integrated approaches to national coordination efforts and for a variety of locally identified education needs.

The University of Wisconsin has used 3(d) funded activities as a catalyst to establish a multi-agency partnership (including state and federal agencies and non-profit organizations) in collaborative state efforts to identify and meet state education needs. Additional special project funds support three national high-priority programs: the nationally acclaimed Farm*A*Syst/Home*A*Syst, comprised of networks and resources designed to promote good property management decisions by individuals; Educating Young People About Water, which provides a searchable data base of national youth water education curricula and resources for water educators; and Give Water A Hand, an action guide and national network of groups enabling youth to take action in their communities.

Our long-term successes with these funds prompt us to make several suggestions about the administration of AREERA:

1. We encourage CSREES to expedite its implementation efforts for these funds to assure that FY 2000 appropriated funds are not lost.

2. We recommend distribution of funds through CSREES, to most effectively meet the goals of the agricultural research, extension, and education activities designated for funding through this act.

3. We endorse the goals of the 1997 CSREES National Strategic Plan for Extension Water Quality and recommend that these seven goals continue to guide the CSREES national effort in water quality.

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4. We suggest that proposal guidelines should set aside a portion of funds to:
   - Provide CSREES with the flexibility to meet unusual or emergency outreach needs.
   - Provide base funding for national coordination of high-priority outreach initiatives.

5. We urge that proposal solicitation should emphasize the following:
   - Proposals may target research OR education/extension rather than requiring that all proposed activities target research, education AND extension. However, all proposed activities should be able to demonstrate the links between research, education, and extension that are required to achieve stated impacts or outcomes.
   - Proposed education and extension activities must reflect authentic outreach/extension methodology and pedagogy. Accepted methodologies use a network of locally based educators, reflect a community-based approach, foster the development of local capacity to solve problems and support community development efforts.

Finally, implementation of Section 406 must have a mechanism to address critical emerging issues. Of all the functions and capabilities that potentially could be lost by not funding the Extension Water Quality Base Program, the ability to respond is the most serious. Flexibility and immediacy are important attributes which allow us to respond to emergencies (i.e., flooding in the Midwest in 1993 and 1994), and to leverage in unique ways with our agency partners.

We wish you good luck in the effort of establishing guidance for Section 406, and I am anxiously anticipating progress and future announcements.

Respectfully,

/s/
Carl O'Connor
Dean and Director
University of Wisconsin Extension

* *

The Importance of Extension Water Quality 3(d) funds in the North Central States

The North Central Region recommends that the base funding from 3(d) funds be restored to the FY 1999 level with the remainder of the funds in	Water Quality 3(d) funds in the North Central Region are essential to the development and maintenance of high-quality outreach programs. Recent discussions at the federal level about the elimination of these funds and creation of a competitive grant program have raised concerns. This note summarizes the importance of 3(d) funds to the eight

section 406 used for competitive grants for integrated projects that include research and extension/outreach, or applied research demonstrations with extension/outreach.	states in the North Central Region (Kansas, Indiana, Illinois, Iowa, Michigan, Minnesota, Missouri and Wisconsin) and to three national, high-priority programs *(Farm*A*Syst/Home*A*Syst,* the *National Water Quality* *Database,* and youth oriented curricula such as *Educating Young People About Water).*

What Have We Achieved with 3(d) Funds?

States- Leveraged Funds **Kansas** $300,000 **RATIO 3(d) funds/state funds: 1:5** **Michigan** $115,000 **RATIO 3(d) funds/state funds: 1:2** **Minnesota** $1,500,000 RATIO 3(d) funds/state funds: 1:10 **Missouri** $465,000 RATIO 3(d) funds/state funds: 1:5 **Wisconsin** $1,5000,000 RATIO 3(d) funds/state funds: 1:10	A stable, integrated program All seven North Central states report that 3(d) funds help create and foster linkages with other agencies as well as ties between research and Extension. The funds have supported: • professional development programs for agents (Illinois, Iowa, Kansas, Michigan, Wisconsin); • start-up expenses for programs that later become revenue-supported (Indiana); • transitional programs for redirecting staff into new areas (Kansas); • multi-agency publications and educational materials (Illinois, Indiana, Iowa, Missouri, Wisconsin); • audience needs assessments (Michigan, Wisconsin). Leveraging and Extension Leadership Working with proper programs in many states of the North Central Region, the 3(d) funds do something that Competitive funds can not so – allow an emphasis on Development of program infrastructure rather than specific Projects typically supported by competitive grants. They also provide an immediate flexibility for state Extension programs to build cross-agency programs. An portion of the average state allocation of $60,000 in each state has been used to help integrate Extension-based outreach with other water resource programs. The 3(d) funds also have provided a multiplier effect in creating more funding.

Successful programs and tangible results

- The funds allowed all seven states to reach clients who otherwise would have been overlooked (e.g., *Educating Young People About Water* support for leader training of Latino youths, and the purchase of educational materials for low-income residents in Illinois).

- In Iowa, the funds were used to develop on-line publications and presentations concerning welll water quality reaching private well owners, well contractors and country sanitarians.

- In Minnesota, 3(d) funds supported conservation tillage programs which resulted in a 20 percent increase in usage by farmers in the project area.

- In Missouri, 3(d) funds were used to create an atrazine education project that dramatically reduced average atrazine levels in surface water by 66 percent. In Illinois, the funds allowed rapid development of materials to alert farmers of atrazine label changes.

- In Wisconsin, 3(d) funds filled funding gaps for an on-farm educator who helped 150 farmers decrease nitrogen applications by 80 pounds per acre (an average savings of $5,000 per farm per year.) The 3(d) funds were then used for a professional development program to help other agents learn about and emulate the project's approaches.

Stable, multi-state programs linked through a national network
The 3(d) funds make Extension programs more efficient by supporting high-priority, regional and national efforts. Programs such as *Farm*A*Syst, Home*A*Syst, Educating Young People About Water,* and the *National Extension Water Quality Database* need consistent support at the national level.

What Will Happen Without 3(d) Funding?

Conclusion The use of 3(d) funds has Accelerated the advancement Of water quality programs And proven to be an Excellent investment in promoting Environmental stewardship and Research-based management Practices. The present funding structure has provided states with a solid level of funding for water quality programs. The change to competitive funding may result in a reduction of integrated, cross-state,	In most states the 3(d) funds have been used as a catalyst, creating and fostering innovative, integrated approaches. States agree that the “behind the scenes” program infrastructure supported by 3(d) funding would be difficult to support through competitive grants, which often are focused on specific projects. Without 3(d) suport , states will likely revert to Individualized projects. Efforts such as the development Of a cross-state network for sharing information and Impact evaluation on Farm*A*Syst/Home*A*Syst will be Seriously reduced, a multi-state approach to expanding Farm*A*Syst along commodity systems will likely be more Focused locally, and states will be less likely to

water quality programming.	Collaborative on innovative ideas and approaches. In Addition, Extension's National Water Quality Database, The youth curricula database and web site, and various activities reaching traditionally under-served audiences would likely be seriously restricted if forced to rely solely on competitive funding. Finally, Extension's ability to be flexible and responsive would be dramatically affected. During severe flooding in 1993 and 1994, for example, 3(d) funds helped provide a rapid response in Missouri, Illinois, and Wisconsin. In each state, a multi-agency team was quickly assembled to work with landowners on needs such as finding livestock feed and coping with contaminated private wells. Competitive grants programs simply can not anticipate these types of needs or provide the level of immediate response.

This information was collected by the University of Wisconsin-Extension in collaboration with North Central Region Water Quality Coordinators (December, 1999). For additional copies, contact Robin Shepard, Water Quality Coordinator, 608/262-1916 rlshepar@facstaff.wisc.edu

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Name: Patrick Logan
Organization Representing: AES and CE, University of Rhode Island

Ms. Joya:

I've attached comments regarding Section 406 from my director, Patrick Logan.

I've also mailed to you three copies.

Thank you for your attention.

* *
December 15, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management

UNITED STATES
DEPARTMENT OF AGRICULTURE

USDAICSREES STOP 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

Comments to: Cooperative State Research, Education and Extension Service
United States Department of Agriculture

On the: Implementation of the Integrated Research, Extension, and Education Competitive Grants Program, Section 406

Submitted by: Dr. Patrick Logan, Director, AES and CE, University of Rhode Island

Thank you for the opportunity to provide comments relative to the development of administrative rules for the new Section 406 of the Agriculture Research, Education and Extension Reform Act of 1998. I am sending these comments electronically, and I have sent three printed copies.

The Cooperative Extension Water Quality Program in Rhode Island was established 12 years ago to provide research-based education and training on watershed science and management tailored to the unique cultural and environmental features of Rhode Island communities. CE's Water Quality Initiative has enabled faculty and staff to develop programs to address community needs and to leverage USDA resources with funds from a variety of public and private sources. As a result, seven faculty and senior professionals staff the program. Thirty student interns and fellowship students have worked with the program and been mentored by faculty and staff since the program began.

In addition, the program:

- Has created and sponsored over 100 educational training sessions on local water resource management.
- Engages over 300 volunteers on an annual basis.
- Serves 90% of Rhode Island cities and towns.
- Has resulted in changes in individual and community actions to protect water quality.

The mission of the CSREES Water Quality Program has been to provide leadership to enable individuals, industry, and government to effect changes that enhance and protect the nation's water resources for the public good. The program's vision is to be recognized as an important and effective partnership providing leadership to solve current and emerging water quality issues. The Water Quality Program is at the forefront of the effective integration of research and extension and has been able to develop a level of capacity at the

state and regional level through a national network of Land Grant Universities, which is both proactive and responsive to emerging issues.

The capacity and strategies of the CSREES Water Quality Program are captured in the document, "Principle, Mission, Vision, Goals and Objectives of the Water Quality Strategic Directions: Education, Empowerment, and Involvement: Safe Rural Drinking Water and Minimizing Agricultural Pollution", January 1998. We recommend that proposals responding to the Section 406 RFP should address or relate to the seven strategies defined in the January 1998 Water Quality Program document.

To continue to build upon the strengths and successes that have been developed and invested in, I would like to comment on two areas as the development of Section 406 proceeds. First, Section 406 should:

- Support the development of institutional (Land Grant University) capacity to foster the development and implementation of locally and regionally relevant extension-outreach WQ programs that are research-based.

- Support programs that leverage fiscal, institutional, and personnel resources.

- Support successful programs that achieve tangible, outcome-based results.

- Support a series of core programs that foster the maintenance of a WQ program with considerable national capacity.

- Support development of capacity at the state and regional level, which enables responses to emerging issues to occur in a timely fashion.

- Support the basic tenets of the Kansas City Water Quality document to include the following:
    - Program and project emphases in the following areas:
    - Under-served audiences
    - Agricultural water quality issues (including nutrient management, reduced pesticide inputs, integration of crop and livestock operations, and specialty agriculture) (receiving 25 - 30% of the total)
    - Watersheds and aquifers
    - Surface water systems
    - Public policy
    - Individual actions
    - Volunteerism
    - Partnerships

- Support and recognition of programs of national significance.

- Support of a national network through enhanced partnerships with other federal, state, and local agencies.

Areas of focus should be identified within each of the above areas so as to enhance the development of capacity on a state, regional and/or national basis as well as on a subject matter basis (community, residential, agriculture, etc.).

Secondly, I recommend that integrated programming should be defined on a broad basis, with eligible projects to be selected within each of three main areas - research, extensionoutreach/research, and extension-outreach. In other words, the concept of integrated programs should not be applied to each individual project, but rather to broader program areas that reflect some sort of connection with national goals and objectives. This approach to integration will support a national program which is coordinated in the areas of extension, formal education, and targeted research that overall achieves the goals of integration.

Programmatic themes should be developed and supported on a multi-state level. These themes should focus on common objectives that may reflect common technologies, approaches and tools that address a clear need and audience within the multi-state group. The multiple states develop a unified program to create educational materials, standardize research methods, coordinate assessment, and analyze and report on the successes and limitations of the program. Individual states would then develop case studies that tailor and apply the program to specific watersheds or aquifers. These individual state projects reflect differences in cultural and natural features. The case studies are likely to evolve from the regional prototype and should result in a robust set of programs that display variation on the general approach. As individual states gain expertise and develop successful programs and partnerships, these lessons will be shared with the other states and result in a broadening of successful programs.

This type of interchange is already underway in several types of programming. For example:

- Farm*A*Syst/Home*A*Syst;
- NEMO (Incorporation of spatial data into community watershed protection);
- The University Consortium for Alternative and Innovative Onsite Wastewater Technology; and
- Scientist-led Volunteer Water Quality Monitoring.

I appreciate this opportunity to comment on the implementation of Section 406. Thank you for considering my comments. Please contact me if you require additional information.

Sincerely,

UNITED STATES
DEPARTMENT OF AGRICULTURE

/s/
Patrick Logan, Director
Rhode Island Cooperative Extension and Agricultural Experiment Station

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Name: Jesse LaPrade, Extension Specialist
Organization Representing: 210 Extension Hall, Auburn University, AL 36849-5647
Telephone: (334) 844-5533
Fax: (334) 844-9022
E-Mail: jlaprade@acesag.auburn.edu

Terri Joya
USDA-REE-CSREES-PS-CRGAM
AEROSPACE RM 3RD FL.
901 D Street S.W.
Washington, DC 20250

FAS/HAS program

I believe a mechanism should be established to allow Farm*A*Syst/Home*A*Syst (FAS/HAS) to be continued as a coordinated national program.

Regards,

Dr. Jesse C. LaPrade
Extension Specialist

Name: Eldon Ortman & Frank Zalom
Organization Representing: Purdue University & University of California

Public Comments by
Eldon Ortman, Purdue University
&
Frank Zalom, University of California
on the implementation of Section 406
The Agricultural Research, Extension and Education Act, 1998

HERITAGE REPORTING CORPORATION
Official Reporters
1220 L Street, N.W., Suite 600
Washington, D.C. 20005-4018
(202) 628-4888
hrc@concentric.net

UNITED STATES
DEPARTMENT OF AGRICULTURE

We appreciate the opportunity to share some ideas relative to the implementation of Section 406 of the Agricultural Research Extension and Education Act of 1998. These comments are presented by Eldon Ortman (Purdue University) and Frank Zalom, (University of California). We serve as co-chair of the National IPM subcommittee appointed respectively by Research and Extension Administration leadership of the Land Grant Schools of Agriculture. The subcommittee has been in place for over a decade, is a broad based group with regional/multi-state representation, is multidisciplinary, has multiple missions, and represents diverse cropping systems. We met most recently in mid-September and, based on our deliberations, presented several recommendations in the IPM area to CSREES Administration and to Land Grant Extension and Research leadership.

Within each region there exists a similarly constituted multi-state, regionally based Intergrated Pest Management (IPM) coordinating committee that is constituted similar to the national committee. Members of the multi-state/regional committee are part of the National IPM subcommittee. These regionally based committees have several roles, including: a) advising the Land Grant agricultural administration and our federal partners on potential collaboration; b) providing linkage and coordination between states/regions/national IPM efforts; c) prioritizing research and extension needs; d) developing initiatives; and e) bringing state stakeholder information and dialogue to the regional Land Grant institutions and their federal partners. Each region manages a competitive IPM grants program in support of the federal partner. In 1993, the regional IPM competitive grants program pioneered the solicitation of joint research and extension projects intended to facilitate local input on research needs and efficient application of the science base. That joint research/extension program has continued in the region since its inception.

The basis for IPM is a distributed state/regional system. The state/regional IPM grants system has been effective in identifying needs at a local level based on established stakeholder relationships. The system is established, has a demonstrated capacity, a performance record and provides a functional network. It would seem beneficial and expedient to directly involve that system in conducting the Integrative Program, or to at least leverage its collective experience as an adviser/partner with CSREES.

The existing national and regional IPM committees could be expanded or modified based on an identified need(s) to meet the requirements and broader goals of the Section 406 Integrated Activity. The regional entities in particular have served the partnership well, and stand ready to be further engaged. The concept of CAR and RAMP came from state/regional/national/federal IPM partnership dialogue. Thus it would seem beneficial to continue that partnering in implementing the program.

Competitive funding is important and desirable, and we support that approach. However, not all research, information and extension education needs can be met with a program of discontinuous funding. There remains a need to support an infrastructure for applied and maintenance research, for continuous base data collection and for extension education to support the US agricultural, food and natural resources system. We suggest that a tiered approach is beneficial. NRI serves a critical role in supporting scientific discovery

and basic investigations. Regional research provides a mechanism for stakeholder input and local involvement in identifying issues and setting research and extension priorities. Infrastructural support is crucial in order to promote coordination and integration of projects and programs that are necessary to support the needs of legal and regulatory programs such as those represented by FQPA, APHIS, etc. These needs are continually evolving, and can require information on a moments notice. Response in this situation is dependent on a funded infrastructure and will not be served by a discontinuous grants program. Funding the infrastructure can also leverage local and industry support of programs since such activities are often more obvious to local stakeholders as it typically addresses their immediate needs. PIAP presents one such example of infrastructural support which provided coordination of data collection to help identify alternatives gleaned from the technical expertise resident in the Land Grant schools for the FQPA process. JR-4 presents another model of infrastructural support for an applied and directed research program that addresses needs of the US agricultural, food and natural resources system.

In our view, the two-three year competitive grants represent an excellent approach for exploratory research, and building a sound scientific base for specific disciplines. However, it is not well suited to developing and implementing an interdisciplinary IPM system. It is most difficult, if not impossible, to build, implement and enhance a sustainable IPM system with a discontinuous funding process. Similarly, it is difficult to address regional and local needs with centralized priority setting and project review. Section 406 is interpreted as being oriented to providing resources to address the applied, development and functional needs of specific program areas. If that objective is to be realized, we suggest there is a need to evolve a new operational model. We believe, as we have demonstrated through regional IPM programs, that new models are possible and desirable. We stand ready to propose and discuss specific attributes and approaches to build on the current regional IPM Land Grant/CSREES partnership in the development of a program for Section 406.

Name: Les Lanyon, Professor of Soil Fertility
Organization Representing: Department of Agronomy, The Pennsylvania State University, 116 ASI Building, University Park, Pennsylvania 16802
Telephone: (814) 863-1614
Fax: (814) 863-7043
E-Mail: lel@psu.edu

Dear Ms. Joya:

The coordination provided by the national Farm*A*Syst/Home*A*Syst (FAS/HAS) office has been an outstanding example of how state programs should be led and supported to meet national goals. The original intention of the program staff to empower the local development of pollution prevention approaches by creating and distributing materials, conducting video and in-person conferences, and individualized support as needed has been so refreshing that I am dismayed at its uniqueness. A program with this track

record and an outward focus on facilitating the accomplishments of the states should not be ignored nor penalized by changes in bureaucratic processes. If anything, the coordination by the national FAS/HAS office should be a model to be emulated far and wide by other programs!

If you have any questions, please contact me.

Les Lanyon

Name: Ginger Baird Wireman
Organization Representing: Home & Farm*A*Syst Coordinator, Water Quality Project Associate WSU Cooperative Extension, Benton County, 1121 Dudley Ave., Prosser, Washington 99350
Telephone: (509) 786-5609
Fax: (509) 786-5525
E-Mail: Gbwireman@wsu.edu

Dear Ms. Joya

In the aftermath of water quality funding being dumped into one big pot, it is imperative that important programs do not fall through the system.

One program of national importance is Farm & Home*A*Syst (FAS/HAS). The coordination role played by the National FAS/HAS ofFice in Madison. The support and ideas generated through the website and email lists they provide help me in my day-to-day delivery of Home*A*Syst in Washington State. The regional meetings they organize allow us to meet other state FAS/HAS coordinators so we can share ideas and information. In the last year I have personally delivered a message about drinking water well protection to about 300 households. Were it not for the excellent materials and support provided by the national office, I'm not sure my program would thrive. There must be funding to ensure there is a coordinated national program mechanism for FAS/HAS.

Thank you for your consideration.

Ginger Wireman

Name: Charlotte Fant, Extension Health Education Specialist
Organization Representing: P.O. Box 391, Little Rock, Arkansas 72203
Telephone: (501) 671-2105
E-Mail: cfant@uaex.edu

As coordinator of the Home*A*Syst (HAS) program in Arkansas, I believe a mechanism should be established to allow Farm*A*Syst/Home*A*Syst (FAS/HAS) to be continued as a coordinated national program. In Arkansas, the FAS/HAS and EQIP programs work closely together. It would serve Arkansans best if the FAS/HAS would be continued as a coordinated national program.

Charlotte Mills Fant
Extension Health Education Specialist

Name: Eric Lane
Organization Representing: State of Colorado
E-Mail: Eric.Lane@ag.state.co.us

I understand you are looking for input on the priorities for a new competitive grants program under CSREES. As state weed coordinator for the State of Colorado, I am writing to suggest that funds be priorities for invasive species management. There is a tremendous need at many levels in the West for research, education, and extension on noxious weeds and other invasive species. This interest spans the spectrum between local and federal lands and land management concerns. I hope that invasive species management will be considered a top priority for grants. I believe that you'll find many partners capable of carrying out projects in the field throughout the West.

Thank you,

Eric Lane
State of Colorado

* *

Comments on Implementing Section 406 of the
Agricultural Research, Extension and Education Act of 1998

To provide context for my comments, let me first provide some background information.

I have served as water quality coordinator for the University of Tennessee Agricultural Extension Service since the start of the USDA water quality initiative in 1988.

The 3(d) water quality funding was, relatively, a very small part of the federal budget. However, it was a significant amount in our state budget and gave us the opportunity to create a long term program that

comprehensively addresses important Tennessee issues. The interdisciplinary team we developed was available to provide quick, effective response to rapidly emerging issues such as the new state confined animal feeding operation (CAFO) regulations. The foundation established with 3(d) funding also let us effectively compete for other federal and state funds. We will not be able to replace this essential base support from our existing budget.

A brief description of our program and list of educational materials we have developed can be found on the Internet at http://web.utk.edu/~gfsmith/esteam.htm.

I am also an original member of the Southern Region Extension Water Quality Planning Committee (SREWQPC) formed in 1989 to share expertise and to provide regional coordination and communication. The SREWQPC is made up of the water quality coordinators in the Southern region.

The SREWQPC has allowed our state program to take advantage of the expertise and successes in the region with a minimum commitment of scarce resources. Also, the regional training programs the SREWQPC has conducted have been very successful; participants consistently rate them as some of the most worthwhile and useful training programs they have attended.

My recommendations for section 406 implementation based on these experiences follow:

1. The seven goals in the "Strategic Directions for the Water Quality Education Program" should be adopted as the objectives of the 406 program. They represent the best current thinking of experienced water quality coordinators from across the nation.

2. The program should also include a means to quickly address critical emerging needs as they appear.

3. Long-term continuity has been important to the successes in Tennessee, the region and the nation. The program must include a mechanism to support long run commitment to water quality protection and improvement. Uncertain annual funding of individual projects will not sustain a comprehensive state program. Further, a collection of varied annual projects will not add up to an effective national program.
4. Regional efforts like the SREWQPC which is a proven vehicle for strong regional programming. Regional training, in particular, has proven value. Information on the SREWQPC can be found in the Southern Rural Development Center Fall 1999 newsletter available on the Internet at http://ext. msstate.edu/srdc/publications/fallsp99. htm.

5. The investment of 3(d) funds also created two highly effective national efforts, the national water quality database at Purdue University and the Farm*A*SysVHome*A*Syst program. Maintaining and strengthening these nationally recognized efforts should be given priority in the 406 program.

6. Integration of research, education and Extension should be defined as overall programs integration. Individual projects should not be required to integrate any two or all three elements.

7. Research should be restricted to applied research focused on the goals of the water quality strategic plan.

8. Extension should be defined as the Cooperative Extension system housed in the 1862, 1890 and 1994 land grant institutions. Continuing education efforts by non-land grant, and land grant, institutions should be included in the education element.

9. Review panels should be composed of a balanced mix of experienced research, education and Extension professionals. Also, all regions of the nation should be represented on review panels because of significant differences in issues across the nation.

10. Objective evaluation criteria should be established with input from experienced research, education and Extension professionals from across the nation. These criteria should be included in requests for proposals.

11. Authors of non-funded proposals should receive all evaluations and review comments in writing as soon as possible after decisions are made.

12. To the extent possible, the Internet and email should be used to administer the program.

I appreciate the opportunity to comment on Section 406. Please contact me if any clarification is needed.

Name: Eric R. Norland
Organization Representing: The National Network of Extension Water Quality Coordinators and the National Advisory/Leadership Team
E-Mail: Norland.1@osu.edu

Terri,

Attached are the comments that were presented on Dec. 2.

Eric Norland

* *

PUBLIC COMMENTS

UNITED STATES
DEPARTMENT OF AGRICULTURE

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by
Dr. Eric R. Norland,
representing
The National Network of Extension Water Quality Coordinators and the
National Advisory/Leadership Team
to the
United States Department of Agriculture
Cooperative State Research, Education and Extension Service (CSREES)
on the
Implementation of Section 406
of
The Agricultural Research, Extension and Education Act of 1998

December 2, 1999
Washington, D.C.

Good morning! Thank you for the opportunity to provide some comments relative to Section 406 and the CSREES Water Quality Program.

My name is Eric Norland, and I am here this morning representing the National Advisory and Leadership Team for the Extension Water Quality Program. This team represents the leadership for a National Network of Extension Water Quality Coordinators established by base program funding. It was created by USDA-CSREES as part of the Extension Water Quality Strategic Plan. The team consists one representative from each Extension Region, and representatives from the 1890 and 1994 land grant institutions.

Some background information is useful in setting the stage for our recommendations. In 1997, CSREES called together a team to create a National Strategic Plan for Extension Water Quality. This plan has been endorsed by the Water Quality Coordinators of all the states and territories.

This plan has seven comprehensive goals:

- Reaching under-served audiences;
- Educating the public about watersheds and aquifers;
- Prevention pollution through best management practices;
- Educating public policy makers;
- Promoting individual actions to protect water quality;

- Promoting volunteerism; and,
- Developing partnerships and liaisons with other agencies and organizations

Our first recommendation is that these goals be adopted as the guidance for the Section 406 Integrated Water Quality Program. Our second recommendation is that "integration" be broadly defined as integration across the national program rather than each project.

We do not believe it was the intent of Congress to *impose* a program structure requiring each and every project to have three-way integration. We believe Congress intended only to *promote* integration where it is feasible and effective. This concept of national integration supports a coordinated program of extension and formal education projects with carefully targeted research that in total comprises an integrated program.

We are particularly concerned that it will be difficult to develop an effective Extension program under Section 406. Those preparing the RFP and those evaluating the proposals must understand Extension and formal education thoroughly. They must understand that an Extension Education Program is not just the preparation of fact sheets and popular reports after a research project has been completed. Extension is an educational process characterized by non-formal and formal education programs that involve the learners in the entire program development process and use appropriate teaching strategies.

We recommend that research funded under Section 406 be limited to applied research targeted to the goals of the Water Quality Strategic Plan.

We are concerned that CSREES will have difficulty establishing a well-balanced review panel. Extension programs, research projects, and university curricula are planned, conducted and evaluated differently. Each has its own model and should not be expected to fit into the model, or mold, of another. The review panel must, therefore, draw on experienced professionals from Extension and education as well as research.

As reflected in the first goal of the Water Quality Strategic Plan, the program must reach underserved, minority audiences. We recommend a program coordinating the 1862, 1890, and 1994 land grant institutions. This program has shown it can reach these audiences with important environmental and health-related education.

Finally, implementation of Section 406 must provide a mechanism to address critical emergency issues as the develop. Of all the functions and capabilities that potentially could be lost by not funding the Extension Water Quality Base Program, the ability to respond is the most serious. In the past, Extension responded rapidly and made a difference during the *Pf steria* outbreaks in the Albemarle Sound and Chesapeake Bay, during the Mississippi River floods of 1993, and when Hurricane Floyd flooded North Carolina pouring millions of gallons and tons of animal manure into rivers and streams.

In summary we recommend the following:

- The goals of the Extension Water Quality Strategic Plan be adopted as the guidance for Section 406;
- Integration be applied to the overall program, not three-way integration of every project.;
- Research be limited to applied research that is carefully targeted to support the goals of the strategic plan.;
- Review panels be balanced to include Extension and education professionals.;
- Under-served, minority audience programs be maintained.; and,
- Emergency response capability be maintained.

We have many more recommendations beyond what we have had time to share today, so it is our intent to provide written input to you by December 17th.

On behalf of the national network of Extension Water Quality Coordinators and the National Advisory/Leadership Team, I thank you for this opportunity to present these comments and recommendations.

Name: Rick Melnicoe
Organization Representing: University of California
E-Mail: rsmelnicoe@ucdavis.edu

Dear Terri,

Attached is the statement I made at the Dec 2 hearing.
This is very slightly modified from the text I gave you, more accurately reflecting my comments.

Rick

* *

Statement of Rick Melnicoe, University of California
at CSREES Section 406 Hearing
December2, 1999
Washington, D.C.

UNITED STATES
DEPARTMENT OF AGRICULTURE

Thank you for the opportunity to comment on Section 406 as it relates to the Pesticide Impact Assessment Program.

My name is Rick Melnicoe. I am the Western Region Coordinator and the California State Liaison Representative to Pest Impact Assessment Program (PIAP). I will make a few comments on Section 406 mainly as it relates to state PIAP.

The Pesticide Impact Assessment Program has been very successful in providing data on pesticide use and usage to USDA and EPA in order to address FQPA issues. This has been accomplished through very well organized state, regional, and national programs. Each state has a State Liaison Representative responsible for PIAP. This has been the strength of PIAP. The state programs have historically been funded by USDA dollars allocated by an algorithm based on a number of agricultural and pesticide factors. This funding has been relatively secure and allowed for state programs to develop with a sense of continuity. Funds have been allocated to land-grant institutions around the first of each calendar year.

Under Section 406, all the funds will be competitive. Significant funding delays to successful states will occur in fiscal year (FY) 2000. These delays will be well into the summer if the Request for Proposals (RFP) is not quickly developed and noticed in the Federal Register. This will, and has, resulted in loss of PIAP staff. This will affect the ability of certain states to respond to FQPA information issues. The continuity of the program will be jeopardized if funding cannot be expedited. PIAP has met the challenges that FQPA has presented for information needs and provided quick responses to emerging critical issues.

I strongly recommend that the RFP be written in a manner that does not fragment the responsibilities of PIAP. In order to fully respond to FQPA issues, a single point of contact is needed for PIAP in each state. The RFP should require the principal investigator to coordinate all FQPA activities within their state and not allow for multiple requesters to divide the funds so that no single person can coordinate the program within a state. Without this requirement, responses to information requests will be hampered. Further, I suggest that the Crops at Risk and Risk Avoidance Mitigation Program be coordinated by this same P.I.

Multi-year proposals should be encouraged. This will help to stabilize the FQPA activities in the states. It will allow for program continuity with SLRs, program staff and student assistants. Multi-state or regional proposals and collaboration with stakeholders should be encouraged in the RFP.

The outreach component to PIAP cannot be overlooked. In addition to providing information to USDA, SLRs are a vital link to state constituents. They provide a direct link from USDA to growers, commodity groups, university researchers and others. This component must not be lost, as the PIAP SLRs historically have been the means to get information to and from USDA.

In conclusion, the implementation of Section 406 may eliminate state and regional leadership and curtail

responsiveness to FQPA, minor crop and other pest management issues. This includes the development of crop profiles, transition strategies and the review of EPA risk assessments and other documents. The ability of the National Program leader and the Of fice of Pest Management Policy to respond to FQPA and other issues would be impacted. The continuity of this national pest management gathering network will be severely compromised by the uncertainty of a yearly competitive funding process unless a mechanism is in place to allow for multi-year funding.

Name: Brant Ladd
E-Mail: laddb@ecn.purdue.edu

Terri,

I help to coordinate the Farm*A*Syst/Home*A*Syst (FAS/HAS) programs in Indiana. They are helpful at the grassroots level to prevent pollution and protect water resources. The national office of FAS/HAS is very helpful in coordinating all the state programs, keeping us updated and informed, and overall in assisting us in continually improving the program. I believe a mechanism should be established to allow FAS/HAS to be continued as a coordinated national program.

Brent Ladd, Coordinator in Indiana

Organization Representing: National Resource Defense Council, 1200 New York Avenue, NW, Suite 400, Washington, DC 20005
Telephone: (202) 289-6868
Fax: (202) 289-1060
Web Address: www.nrdc.org

Comments of the Natural Resources Defense Council (NRDC) on the Implementation of the Cooperative State Research, Education and Extension Service (CSREES) Integrated Research, Education, and Extension Competitive Grants Program (Section 406)

December 17, 1999

National Resources Defence Council (NRDC) is a nation-wide, non-profit environmental organizations with over 400,000 members and contributors nationwide. NRDC has worked for over 20 years to improve the safety of the food supply and the environmental performance of agriculture. In addition to promoting strict safety standards for pesticide residues in food, NRDC has been at the forefront of encouraging research, development and implementation of alternative pest management systems that reduce agriculture's reliance

on hazardous materials. As such, we remain extremely interested in the mission, structure and outcome of federal agricultural research, education and extension programs. Thank you for the opportunity to submit comments on Section 406 implementation.

Our recommendations follow:

1. Model the Structure of the 406 Program on the SARE and Regional IPM Competitive Grants Programs

Section 406 requires changing the allotment of federal funding through state formula mechanisms to administration of a competitively awarded grants program. Instituting this change provides an important opportunity for CSREES to improve the process and final outcome of federally funded agricultural research, education and extension.

It is of utmost importance that the Section 406 program be modeled after a program such as the Sustainable-Agriculture Research and Education (SARE) program not the National Research Initiative (NRI). The NRI is a competitive grants program that is designed to fund basic scientific research. Using the NRI as a model would not be appropriate, given the goals of Section 406, which require CSREES to provide "integrated, multifunctional agricultural research, extension, and education activities." The principal drawback of using NRI as a model is that the NRI does not involve farmers and other stakeholders in' the prioritization process nor does it pursue multi-disciplinary research. In addition, it operates at the national, rather than the regional level.

However, a program such as SARE uses a decentralized structure with strong stakeholder involvement. This approach has been shown over the past decade to produce sound science, rapid adoption of results, and enthusiastic support from stakeholders. SARE grants are administered through four U.S. regions, where an Administrative Council comprised of all segments of the community—farm, business, education, nonprofit, and state government—sets priorities and identifies grant awards. Grants are awarded to partnerships, including both scientists and producers. Grants are also awarded to producers to conduct their own on-farm research. In addition, SARE places a strong emphasis on communication via its regional communications specialists and its national outreach arm, the Sustainable Agriculture Network. This allows the program to reach thousands of farmers, educators, agricultural professionals and consumers through a variety of publications and electronic charmers.

2. Create a Regional Program With a National Presence

The principle advantage of modeling the Section 406 program after SARE is the creation of a regional program with a national presence. Priorities are established and grants are issued at the regional level. This ensures that the program will be responsive to and supported by the community within which it operates. Section 406 priorities such as water quality and food safety will differ within different regions. A nationally- -

coordinated program could do a great disservice to certain areas and issues. However, a nationally-coordinated communications system modeled after SARE could be extremely advantageous for broadening the diversity of stakeholders involved in the program and reaching a large number of farmers and other collaborators.

3. Involve A-Broad Cross Section of Stakeholders, Particularly Farmers

The SARE program offers an extremely useful model for broad stakeholder involvement in establishing priorities and deciding which grants to award. For the purpose of accelerating the adoption of IPM, it is particularly important to involve those individuals who work closely with farmers identifying and managing pest problems, including extension agents, independent pest control and crop advisors, and in some cases local input suppliers. Farmers no longer receive all of their information about pest management from the University, thus if Section 406 programs are to leverage long term change in the agricultural sector, they need to involve all responsible individuals.

Farmers' priorities for research often differ from those of academic researchers. They often request research that addresses practical on-farm problems using a multidisciplinary approach. Given that farmers are the primary beneficiaries of research, education and extension activities, their involvement is crucial and should include, at a minimum: 1) establishing priority issues for research, education and extension efforts, 3) deciding which grants are awarded, 3) being involved in research and education activities. Farmers learn a great deal from being involved in on-farm research. Section 406 site-specific priorities are more likely to be met if scientific research and the practical on-farm research of farmers are integrated. Farmers also learn well from each other thus the extension component of Section 406 should emphasize the development of farmer-to farmer networks.

4. Focus on Implementation

The public's demands on agriculture for a cleaner environment and safer food supply are increasing. Farmers are interested in being stewards of the land, what they often lack is site-specific information about alternative technologies and methods. It is imperative that CSREES utilize public funds to get information about alternative practices into the hands of farmers. While research, particularly on-farm research,-will continue to be important, the time is ripe for increasing the emphasis on enhancing implementation of alternative practices.

Implementation occurs in tine' private sector, on farms in coordination with pest control and crop advisors, input suppliers, commodity organizations, processors, and other industry players. Enhancing implementation means working directly with and empowering these parties. In this fashion, CSREES has the greatest opportunity to leverage private funds and resources to meet public health and environmental goals.

5. Emphasize Six Elements of Effective Pest Management Partnerships

Section 406 lists a variety of integrated activities that USDA may fund in FY 2000, including water quality, food safety, pesticide impact assessment, response' to FQPA, and methyl bromide. We support funding of programs designed to assist growers in the transition away from reliance on FQPA-targeted' materials, in particular the Crops at Risk (CAR) and Risk Avoidance and Mitigation (RAMP) programs. We strongly urge that CSREES design the RFP for each of these programs such that grants are awarded to programs that incorporate at least several of six elements that have been identified for the operation of effective pest management partnerships. The elements were developed at two 3-day workshops held in Clarksville, Michigan and Madison, Wisconsin in the summer of 1999 that were sponsored by the World Wildlife Fund, Gerber Products Company, Del Monte Foods, the Lodi-Woodbridge Winegrape Commission, and the WWF/WPVGNUW Collaboration.' USDA also supported these workshops. The following six elements provide a useful framework for designing, implementing and evaluating FQPA transition projects:

- Measurable goals and timetables for adopting alternatives to and reducing use of FQPA-targeted materials
- Tools for gaining grower and industry buy-in
- Coordination and oversight of stakeholders and management needs
- Outreach, extension and field implementation to disseminate and demonstrate alternative materials and methods
- Research to develop and document alternative materials and methods
- Documentation and evaluation of progress to measure success and provide critical feedback

Name: David Moore
Organization Representing: Western Growers Association, P.O. Box 2130, Newport Beach, California 92658
Alternate Address: 17620 Fitch Street, Newport Beach, California 92614
Telephone: (949) 863-1000
Fax: (949) 863-9028
Web Address: http://www.wga.com

December 17, 1999

UNITED STATES
DEPARTMENT OF AGRICULTURE

To: Ms. Tem Joya
Competitive Research Grants and Awards Management
USDA/CSREES

From: Nancy Williams

Re: Comments on Implementation of Section 406 of the Agricultural Research, Extension, and Education Reform Act of 1998 - Funding fm the Pesticide Impact Assessment Program (PIAP)

The attached comments are being sent via fax to comply with the December 17, 1999 deadline for comments pertaining to the implementation of section 406 of the Agricultural Research, Extension, and Education Reform Act of 1998.

Three copies are being sent via regular mail.

If there are any questions please do not hesitate to contact us.

* *

December 17, 1999

Ms. Terri Joya
Competitive Resesrch Grants and Awards Management
USDAICSREES
STOP 2240
1400 Independence Ave., SW
Washington, DC 20250-2240

Dear Ms. Joya:

RE: Comments on Implementation of Section 406 of the Agricultural Research, Extension and Education Reform Act of 1998 - Funding for the Pesticide Impact Assessment Program (PIAP)

Western Growers Association (WGA) is an agricultural trade association whose 3,300 members grow, pack, and ship 90% of the fresh vegetables and approximately 60% of the fresh fruit and nuts grown in Arizona and California. This constitutes more than one half of the nation's production of fresh produce. WGA was founded in 1926 to provide the industry with support programs that could not be generated by a single grower operating alone.

UNITED STATES
DEPARTMENT OF AGRICULTURE

Although it is our understanding that the U.S. Department of Agriculture (USDA) is acting pursuant to the provisions of the fiscal year (FY) 2000 Agriculture Appropriations Bill, WGA would like to express its deep concern with the change in the funding for the Pesticide Impact Assessment Program (PIAP). The PIAP's primary functions of data collection and as a conduit for information do not lend themselves well to a competitive grant system. These activities need the continuity of funding to maintain staff, collect data regularly, and establish the trust of the growers and regulators.

The state liaisons for the PIAP have become a vital source of information on the pesticide use of individual states and crops for USDA and the Environmental Protection Agency (EPA), especially as the Food Quality Protection Act (FQPA) is being implemented. Since its passage in 1996, PQPA has dramatically increased the need for detailed information on how and why growers and other users utilize pesticides.

Because the PIAP liaisons were already established and had developed relationships with growers and other pesticide users over the years, USDA's Office of Pest Management Policy has turned to the PIAP liaisons for information. With their established network, the liaisons were poised to respond to new information needs rapidly. This would not have been possible with programs funded by competitive grants, which can take many months to be awarded and would not provide the flexibility to respond immediately to changed needs.

The difference between data collection programs and research programs is also critical. Regulators, growers and other decision-makers often simply need to know how much of something is out there, how frequently something occurs, or why a certain action is taken. This is not necessarily research in the classic sense - rather, it is basic data, or information, collection. Unfortunately, the research academic system (nor ARS) does not reward individuals engaged in this type of data collection work. However, without such data, decision-makers do not have adequate information upon which to base decisions.

For example, PIAP's assistance in compiling crop profiles—in which the pest problems, current pest control practices and potential new practices for a commodity are described— allows growers, IR-1, USDA and EPA to determine current and future pest control needs. The compilation of crop profiles is needed from all over the country - not simply from those regions which are successful in obtaining a grant under a competitive system.

While we understand the consolidation of PIAP’s funding into one source was intended to reduce the administrative burden on the PIAP liaisons, we understand it has apparently also had the consequence of removing a stable source of funding for the liaisons.

For the above reasons, WGA urges USDA to work the Congress to remove the PIAP program from the competitive grants program for FY2001. Further, WGA urges USDA to work to identify, if at all possible, a source of funding for the PLAP program over the remainder of FY 2000.

WGA appreciates the opportunity to comment on this important issue.

Sincerely,

/s/
David Moore

Name: Roger G. Crickenberger, Assistant Director
Organization Representing: North Carolina State Extension Service, College of Agriculture and Life Sciences, ANR/CRD Office, Campus Box 7602, Raleigh, North Carolina 27695-7602
Telephone: (919) 515-3252
Fax: (919) 515-5950

December 17, 1999

TO: Ms. Terri Joya
Competitive Research Grants and Awards Management

FROM: Roger G. Crickenberger
Assistant Director

RE: Comments on the integrated Research, Education, and Extension Competitive Grants Program

Attached you will find comments representing two programs that will be impacted by the proposed change in allocation of funds for pesticide impact assessment and crops at risk from FQPA. Our colleagues were also part of and concur with the comments provided from the Southern Region Water Quality leaders.

As you can see from the attached, there are serious concerns about the proposed change disrupting and possibly terminating valuable and needed programs. We request that in the review of the comments and the possible alternatives, that the ability of those who implement the programs and the ultimate beneficiaries of the programs be given primary consideration.

Cc: Dr. Jon Ort
Dr. Johnny Wynne

* *

Comments Regarding the RFP process for Crops at Risk from FQPA

We feel as though the money allocated for Crops al Risk from FQPA should be increased. It is probable that mirror use crops will be most severely affected. Given the large number of minor use crops, $1 million is inadequate to address problems that implementation of EQPA may cause. While some PIA monies ($4.541 million) will be available to help with minor use crops, these monies will not necessarily target broader pest management issues raised by FQPA implementation.

We also support regional allocation of funds. Many pests, especially plant pathogens, are more severe in the Southeast that any other region of the country. The best way to address these regional issues is to allocate funds on a regional basis. While the monies should be competitive, special consideration should be give to minor use crops within a region.

Crops at Risk Program
Department of Plant Pathology
North Carolina Stale University

* *

Comments Regarding the RFP process for PlA

The primary objective of the USDA's Pesticide Impact Assessment Program historically has been "to provide the most objective and accurate data available for defining and evaluating the benefits and risks of selected pesticides having critical agriculture and forestry uses." The USDA in cooperation with the Land-grant universities have successfully served this function for 23 years. With the passage and subsequent implementation of the FQPA of 1996, the Pesticide Impact Assessment Program has taken an even more prominent role in providing this type of information to USDA. In the past 12 months, the Pesticide Impact Assessment Program has supplied the USDA'S Office of Pest Management Policy with objective and accurate pesticide use and pest management data in the form of "crop profiles" and have participated in the reviews of U. S. Environmental Protection Agency (EPA) pesticide risk assessments and USDA transition strategies relating to the FQPA. The past and current success of the Pesticide Impact Assessment Program is directly related to the organization of the state, regional and national pesticide impact assessment programs. The state programs, funded by the USDA's CSREES through a formula based a number of factors relating to agricultural production and pesticide use in the states and territories, collect data proactively via grower surveys and other means and respond to specific requests for data from the USDA. Those efforts are coordinated in each U. S. state and territory by a State Liaison Representative, who serves as a contact point for the USDA. The regional programs provide regional leadership to the slate programs and distribute funds to the states for short-term research and Extension projects. Finally, the national program gives direction to the regional and state programs and serves as the liaison to the EPA and other federal agencies that are users of the pesticide use and pest management information generated in the

states and territories.

A current example of how the Pesticide Impact Assessment Program generates and furnishes timely and accurate pesticide use and pest management information to the USDA and other federal agencies is the development of "crop profiles," which are pest management profiles for U. S. agricultural crops. In May 1998, thc USDA's Office of Pest Management Policy and CSREES Pesticide Impact Assessment Program introduced the concept of crop profiles at the National Pesticide Impact Assessment Workshop in Sacramento, California. Crop profiles contain the type of information on agricultural pests and their management (including pesticide use) required by the EPA and other regulatory agencies for the implementation of pesticide tolerance reassessment under the FQPA. State Liaison Representatives from nearly all of the states and territories left the workshop with a clear mission provided by the national program, to develop crop profiles for critical agricultural crops in their individual states and territories. The state pesticide impact assessment programs have responded to the charge. By December 1998, the first completed crop profiles were submitted to thc USDA's Office of Pest Management Policy and forwarded to the EPA. As of December l999, 200 crop profiles from 37 states and territories have been submitted. More than 500 crop profiles representing agricultural crops in all the U. S. states and territories are expected over the next several years. The successful completion of crop profiles is not only the result of the efforts of the state programs in the past year, but is also the result of research and Extension activities and relationships established by pesticide impact assessment program personnel in the states and territories over a period of many years. For example, crop profiles for 20 agricultural crops have been developed in North Carolina. Pesticide use and pest management data that served as the basis for the North Carolina crop profiles were obtained from mail surveys of growers in the state conducted from 1988 to 1998 by the North Carolina Pesticide Impact Assessment Program at North Carolina State University. While the need for crop profiles has been recent, the development of crop profiles has been a proactive, long-term effort by the pesticide impact assessment programs in North Carolina and other states and territories.

These comments are to register concern regarding the movement of Pesticide Impact Assessment Program funds into the Section 406 category and its effect on the continuity of the pesticide impact assessment programs in North Carolina and other states and U. S. territories. In North Carolina, as well as in many states, the formula funds for pesticide impact assessment are used to support the salary of faculty and support personnel. Without these individuals, the program's research and Extension activities would be very difficult to accomplish, particularly those activities that are proactive in nature (e.g., pesticide use data collection). Of immediate concern is the expected delay in funding for FY 2000. If the RFP, is not developed quickly, the delay in providing the funds to successful states and territories may result in a loss of staff which would affect the states' ability to accomplish the goals of the program, particularly in the short term. A loss of staff would also represent a significant loss of experience in the state programs.

Second, it is important that projects be funded for multiple years to assure the proper development and continuity of pesticide impact assessment programs. Multi-year projects (3 to 5 years) would stabilize programs and allow the development of staff needed to perform program activities, especially proactive

projects. Many pesticide impact assessment activities depend on linkages established with Land-grant university faculty and staff, growers, commodity organizations, industry persons, state departments of agriculture, and others. These linkages require time and effort to establish and maintain. They also are based on a certain degree of trust which is achieved through two-way, time-tested working relationships.

Third, the outreach component of the state pesticide impact assessment programs must not be overlooked in developing the RFP and awarding grants. Information generated through research and Extension activities relating to pesticide impact assessment is extremely valuable to the Land-grant University clientele in the states and territories and must be extended. Distribution of such information contributes to the establishment of linkages that are beneficial when pesticide use and pest management data are needed to respond to issues resulting from the FQPA and pesticide re-registration.

Finally, the Pesticide impact Assessment Program has a list of well-defined program objectives resulting from a 1995 review of the Program. There are also program objectives related to the implementation of the EQPA, most notably the development of crop profiles. It is essential to the success of the program that the previously-established program objectives be included in the RFP and that successful proposals address all, or at least most, of the objectives (including outreach). The Pesticide Impact Assessment Program has served USDA, Land-grant universities and their clientele for more than 20 years. With the present data requirements resulting from the implementation of the FQPA, it is essential that the Pesticide Impact Assessment Program continue to perform its unique mission in a timely and efficient manner.

Pesticide Impact Assessment Program
Department of Entomology
North Carolina State University

Name: Robert L. Gilliland, Vice President and Director for Utah State University Extension
Organization Representing: Utah State University Extension, Logan, Utah 84322-4900
Telephone: (435) 797-2200
Fax: (435) 797-3268

December 13, 1999

Ms. Terri Joya
Competitive R) esearch Grants and Awards Management
USDA/CSREES
STOP 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

UNITED STATES
DEPARTMENT OF AGRICULTURE

Dear Ms. Joya:

We thank you for the opportunity to comment on Section 406 of the Agriculture Research, Extension, and Education Reform Act of 1998 (AREERA). Smith Lever 3(d) funds have allowed Utah to be a player at the same level as other states with greater populations and financial resources. In many cases, these funds have simply assured that Extension has been at the table and has had the ability to respond to new issues as they arise. Our comments are primarily addressed to the Pesticide Impact Assessment, Water Quality and Food Safety Programs.

PROGRAMS

The purpose of the Pesticide Impact Assessment Program is to provide the most objective and accurate data available for defining and evaluating benefits and risks of selected pesticides with critical agricultural uses. This program has been very successful in providing data on pesticide usage to USDA and EPA in order to address Food Quality Protection Act implementation. Very well organized and stable programs functioning simultaneously at the state, regional and national levels have been able to accomplish this task. This multilevel system has been the strength of this program and has led to its success. An interactive network of land-grant institutions, growers, agricultural associations and state, regional and federal agencies have been consistently working together to provide the best input possible for decision making.

The purpose of the Water Quality Program is to provide educational leadership that allows people, government and industry to bring about changes that protect the nation's waters. This program has been at the forefront of the integration of extension and research. Utilizing the 3(d) funds and the Land-grant University, a proactive and responsive program that addresses emerging issues has been developed that disseminates education through a national network. For example, cooperating with other agencies, a Utah Riparian Management Brochure has been developed. (Extension contributed about 20%, with the remainder from other agencies). A Water Quality Geographic Information System for priority watersheds in Utah has been developed and the Colorado Salinity Project has been continued. Habitat Improvement, Farm-A-Syst and faculty salary have all been paid from these funds

The purpose of the Food Safety Program is to provide educational programs covering food science, nutrition, veterinarian medicine, pesticide application, IPM, beef quality assurance, biotechnology and media communication. Beef Quality Assurance programs are in place for training beef producers. On-going pesticide handling certification and IPM programs have clientele among commercial growers and home gardeners. Information from the Guide to Minimize Microbial Food Safety Hazards for Fresh Fruit and Vegetables are included in training programs. County programs teach ServSafe to local food service providers. Food preservation and storage guidance comes only from Cooperative Extension. Food preservation is very important because a large percent of Utah families have a food storage program.

ORGANIZATIONAL IMPACTS

The proposal for the 406 funding will erode the partnership upon which Cooperative Extension was built. All of the federal funds received for Cooperative Extension Programs are leveraged with other funding sources to develop the partnership, which has been so successful over the years. The 406 funded programs, as we understanding them, will provide no funding for the current year until the year is about over and only if our proposals are selected for funding. We have ongoing programs, which have been funded in the past and are presently being carried out. What do we do about these programs? Do we terminate employees and cancel these programs?

Over the long term, these programs will lose personnel and become fractionated because of the insecurity of long term funding. Many years spent establishing programs with responsive methods could be lost when stability is needed to address the expanding scope of these programs. The uncertainty of future funding will force us to seriously consider whether to make firm financial commitments to these programs. Top faculty funded through these programs will begin to look for other more secure positions leaving surviving projects with lower quality temporary personnel. If programs are funded for a year at a time, long term programs, goals, impacts and outputs will be replaced with short-term projects, activities and indicators. The long range goals and impacts we are now making with the programs will be reduced.

SUGGESTIONS

O We need a federal partner we can work with to develop programs which will have long-term outcomes and make impacts. We wish to build a partnership where all partners are willing to commit long term. We suggest the 406 funding remain within the organization to build stability into the partnership.

O We need a transition period to move from the traditional funding of these programs to the new procedure. This would allow us to continue our present programs until the RFPs are out and we can apply for funding.

O We need a multi-year funding cycle of at least three years but preferably five years to coincide with our five-year plan of work. The complexity of resolving problems within these systems requires both multi-year and multi-tactical methods. Many times unforeseen issues arise that require immediate response and a refocusing of resources in order to solve the problem. Multi-year funding allows us this capacity.

O Each of these programs needs a single point of contact at the state level to facilitate coordination of goals and activities.

O Goals already in existence for these programs should be continued in order to build upon successes. Successful programs should be continued to maintain productivity and bring about change.

O Communication networks and working relationships between stakeholders and others need to be continued in order to assure the success of these programs and maintain our creditability as partnering agencies.

O The local, state and federal partnership must be maintained if high impacts are to continue. True partnerships are based on trust developed over years of positive working relationships where each partner fulfills their role.

Thank you very much for the opportunity to submit these comments.

Robert L. Gilliland
Vice President and Director for
Utah State University Extension

cc: Charlotte Brennand
Howard Deer
Chuck Gay
Kevin Kesler
Sherm Thomson
Ralph Whitesides

Name: Charles Abdalla, Associate Professor of Agricultural Economics
Organization Representing: Penn State University, Dept. of Ag Economics and Rural Sociology, 201-B Armsby Building, University Park, PA 16802
Telephone: (814) 865-2562
Fax: (814) 865-3746
E-Mail: Cabdalla@psu.edu

Dear Ms. Joya:

Three hard copies of the letter below were sent via US mail today.

Charles Abdalla

December 17, 1999

UNITED STATES
DEPARTMENT OF AGRICULTURE

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES, STOP 2240
1400 Independence Avenue, SW,
Washington, DC 20250-2240

Dear Ms. Joya:

I am writing to address the priorities of the Integrated Research, Education, and Extension Competitive Grants Program as printed in the November 19, 1999 Federal Register.

My first comment relates to the importance of taking an integrated approach to agricultural related issues. Clearly, these issues do not respect disciplinary or functional lines and we need to invest much more heavily in integrated approaches to come up with results that actually address the problems as they exist in the real world. A number of USDA funded research programs have taken too narrow a view of issues from a production science standpoint and tended to not overlook the role of broader social and economic systems in which the farm producer or rural resident exists. If these issues are to be effectively resolved, research and education programs that are lead by (or include in a significant way) economists and social scientists will be needed.

Second, I have a more specific comment on the Water Quality subject matter area in the program description. With external funding (non-land grant), I have initiated several multi-state and state and local educational programs efforts involving partnerships. These have been quite successful. The availability of seed money, the requirement for a partnership, and the availability of technical support were some of the key ingredients in the success of these projects. (Some other ingredients are contained in a Penn State publication titled: Community Groundwater Education in Pennsylvania: Lessons from Successful Project Leaders). Agricultural-related water degradation was addressed by only a fraction of the local initiatives that were undertaken as part of these projects. There are many critical ag-related water issues in Pennsylvania, the Northeast, the Middle Atlantic States, and Great Lakes States. More issues will arise in the future due to changes in agriculture and in rural demographics. Partnerships are an extremely effective way to organize and create innovative educational approaches to water quality education. But they can be challenging to organize and manage. Additional funding is needed to help extension and other organizations use existing methods for conducting education and research and to develop and evaluate new ones. Integrating the human, organizational and public policy dimensions of water quality

issues will be critical to the success of future research and educational programs.

Thank you for the opportunity to contribute to this new and exciting program.

Sincerely yours,

/s/
Charles W. Abdalla
Associate Professor of Agricultural Economics

Name: Leonard P. Gianessi
Organization Representing: National Center for Food and Agricultural Policy, 1616 P Street, NW, First Floor, Washington, DC 20036
Telephone: (202) 328-5048
Fax: (202) 328-5133
E-Mail: ncfap@ncfap.org

Public Comments by
Leonard P. Gianessi
to the
Cooperative State Research, Education, and Extension Service (CSREES)
U.S. Department of Agriculture
on the
Implementation of Section 406
of the
The Agricultural Research, Extension and Education Reform Act of 1998
(1998 AREERA)
December 2, 1999

My name is Leonard Gianessi. I'm a Senior Research Associate with the National Center for Food and Agricultural Policy - a private non-profit research association here in Washington, DC. For the past 10 years I've worked on maintaining a national pesticide usage database. Our database is the only comprehensive publicly-available database for the U.S. covering all states, 87 crops and 200 pesticide active ingredients. A major source of pesticide use data for our database has been pesticide usage surveys and reports supported by PIAP. Since l99O, several hundred pesticide use reports have been prepared with PIAP support. Most of these PIAP supported reports cover individual crops in a particular state. The PIAP funded reports have served as a natural complement to the statistical surveys conducted

by the National Agricultural Statistics Service (NASS). NASS surveys cover major crops in major states. The PIAP surveys fill in the gaps. There are literally hundreds of crop uses of pesticides for which we would have no information were it not for the PIAP surveys. The PIAP surveys have included certain types of information that are very useful in analyzing regulatory policy - target pests, timing of application, formulations and types of applications. I urge the continuation of support for pesticide use surveys as part of the new PIAP. Many of the PIAP funded surveys are several years old and need to be updated. Many crops still need to be done.

Another feature of PIAP that has served us well has been the designation of a State Liaison Representative (SLR) for each state. Each state has a unique set of pest control problems and pesticide use patterns. I've been in regular contact with SLR's for a decade, and they have facilitated reviews of our database, the gathering of more information from Extension agents, and have answered many questions about usage patterns. I think that USDA needs the network of SLR's to provide the critical link to Extension Service specialists in each state.

Another kind of report that PIAP traditionally has supported has been the analysis of alternatives to currently used pesticides. Recent reports have covered cranberries, strawberries, tomatoes and asparagus. We can debate the methodologies used in these reports, and we can argue about the exact numbers used. These reports are controversial, but these reports are valuable because they reflect the views of Extension specialists who

speculate on what would happen if EPA canceled certain pesticide uses. They let us know how important these uses are by putting numbers on them. Some crop pesticide uses receive very high values; other crop uses have received lower values.

For the past few years, EPA has considered restricting use of organophosphate insecticides. PLAP funded reports covering cranberries and asparagus analyze the impacts of the potential loss of organophosphate insecticides for those crops. The conclusions in the reports are that the loss of the organophosphates would lead to the total collapse of the asparagus industry on the West Coast and the cranberry industry on the East Coast. Those conclusions were supported with analysis, with information, with data, with numbers. Again we could argue about the exact numbers, but clearly the specialists were conveying their very strong concerns about the importance of these pesticides. This was valuable information to convey to the regulators.

PIAP needs to support studies to estimate more rigorously the consequences of restricting pesticides. There has to be a better way than simply asking an Extension Service specialist to speculate and provide an estimate. Methodological work is needed on the procedures that are used to estimate potential losses and to calculate the potential economic impacts of those cancellations.

Perhaps the new PIAP should focus on developing databases by crop, state and pest that identify the

current usage of pesticides, the target pests, the efficacy of available controls and the costs of those alternative controls.

Maintenance of a national database of this nature could be built up from the state level and is critically important for USDA to implement. No one else is going to do it. The agricultural chemical industry is not going to assemble such a database, nor is EPA. It is up to USDA to continue to provide the analytical structure and the data necessary to analyze the potential choices among pest management alternatives and regulatory policies.

Name: Dave Pike
Organization Representing: University of Illinois at Urbana-Champaign, Department of Crop Sciences, 1102 South Goodwin Avenue, AW-101 Turner Hall, Urbana, IL 61801-4798
Telephone: (217) 333-3420
Fax: (217) 333-9817

10 Dec 99

Terri Joya,

Please include my comments in the package that goes fonvard to the RFP development panel for the PIA program.

I appreciate your help on this. Thank you

Dave Pike

* *

10 Dec 99

To the panel developing an RFP for the Pesticide Impact Assessment Program

I appreciate the opportunity to submit comments for your consideration prior to the development of the RFP for the Pesticide Impact Assessment Program. As the State Liaison Representative for the State of Illinois I am concerned about the program and the possible impact of the changes brought about by inclusion of PIAP in the Integrated Activities category of the Federal Budget.

After reviewing the comments presented orally on the 2nd of December I can say that I agree with and support each

and every statement made by the presenters. All that I can find to add is to re-emphasize the importance of a few salient points.

First, I agree completely that a single point-of-contact within each state is essential to providing program continuity and stability. Over the years as a liaison representative I have developed close ties with state agencies, grower groups, and national organizations. Each of these relationships is a two-way interdependence based on experience, trust, and a working knowledge of the capabilities of the people and their programs. These relationships have been very fruitful and have allowed me to access the people and information necessary to address critical pesticide registration issues in a timely manner.

These relationships have also been fruitful over the years in that a number of cooperative projects have been jointly carried to completion. These projects have included publication of pesticide use summaries of NASS data not otherwise available, publication of pesticide use and pesticide efficacy data in cooperation with the National Center for Food and Agricultural Policy (NCFAP), and development of a corn OP decision matrix with the National Corn Grower's Association. Relationships with these organizations and these types of projects would not be possible if a single point-of-contact within the state is not maintained.

In addition to the above, an Illinois project which has been a benefit to the PIA program nationally, is Aria. Aria is software which facilitates entry and analysis of data from pesticide use surveys and automatically encodes the information in a standard format for submission to a central data center. This software, which was developed under my direction, would not have been possible without the feedback and cooperation of PIAP colleagues in other states. This type of cooperation is only possible when people and programs have stability. This useful tool could not have been developed, nor would continuing support and training be available, if multi-year support were not implicit in the funding.

I believe that it is evident that the lack of a forewarning of budgetary changes has already adversely impacted the ability of PIAP to respond to FQPA issues. Some personnel have been lost due to the uncertainties of funding and many projects suspended. To reduce further impacts I would urge panel members to consider a gradual phasing-in of the allowable overhead expenses and an expeditious release of the RFP.

/s/
David R. Pike
University of Illinois

Name: Billy Diction, Interim Associate Dean and Director & Ronnie Byford, Department Head, Plant Sciences Dept. & Craig Runyan, Extension Water Quality Program Coordinator
Organization Representing: New Mexico Cooperative Extension Service

UNITED STATES
DEPARTMENT OF AGRICULTURE

Public Comments
From New Mexico Cooperative Extension Service
Presented to
United State Department of Agriculture
On Implementation of Section 406 of
The Agricultural Research, Extension and Education Act of 1998

The New Mexico Cooperative Extension Service (NMCES) takes this opportunity to recommend and support the following actions toward the implementation of Section 406 designed to fund the USDA Integrated Research, Extension and Education Competitive Grants Program.

- NMCES recommends adoption of the Extension Water Quality Strategic Plan as a guidance for the Section 406 RFP and grant award process.

NMCES Water Quality programs adheres to the seven goals outlined in the Strategic Plan. This plan is used as a criteria in development and implementation of state WQ programs. Priority goals of the plan include addressing New Mexico's under-served Hispanic and American Indian audiences, pollution prevention through best management practices, and education of public policy makers.

- NMCES urges that integration of USDA funded water quality projects be program rather than project integrated with research, extension, and formal education.

It is without doubt that most of NMCES impact on improving water quality is accomplished through non-traditional outreach education programs. Activities such as workshops for American Indian agricultural producers, homeowner household hazardous waste reduction, and animal waste management for large scale livestock producers do not necessarily require the inclusion of research or formal classroom components to be successful . On the contrary, much of the science is complete and requires only outreach delivery to targeted audiences who can most benefit. Also, New Mexico's rural and minority audiences are far removed from opportunities for classroom focused training.

- NMCES recommends funding only applied research projects that complement the goals of the Strategic Plan.

A view functional to this recommendation is that Extension professionals be sufficiently represented in the grant review process. It is our feeling that this process be managed by USDA and not contracted to institutions less sensitive to the needs of Extension, applied research, or education.

- NMCES strongly recommends that particular consideration be given to programs addressing the needs of under-served minority audiences.

New Mexico's Extension WQ programs targeting minority populations have a strong need of Extension oriented

outreach education. Currently, NMCES has implemented the New Mexico Tribal Lands Water Quality Project with the goals of delivering water quality and natural resources education to tribal members and leaders of the Navajo, Jicarilla Apache, and Zuni reservations. The limited resources and lack of understanding of land use activities impact on water quality by these audiences creates a critical need for continued programming.

- NMCES recommends establishing a mechanism within Section 406 implementation for maintaining Cooperative Extension's capacity for responding to urgent and emergency water quality/quantity needs of the people of New Mexico and the nation.

Early 1999 and into the summer saw most of the state of New Mexico falling deep into drought. Many portions of the state were declared in Emergency Drought Status by the Governor. NMCES involvement in the Governors' Drought Task Force and mitigation activities for agriculture, tourism, and public health industries was contingent on funding resources that could not otherwise have been planned for. This is only one example of the often urgent need for quick response to local issues that cannot be anticipated in a grant proposal. The strong national network of Extension professionals that are available for technical assistance in times of urgent need is critical to the maintenance of our reputable programs.

- NMCES urges continuity in funding national replicable programs that provide coordinated leadership and assistance for recognizable and successful programs.

Specifically, we support a mechanism be established whereby the National Farm*A*Syst/Home*A*Syst program be continued as a national program. New Mexico Farm*A*Syst has continued to provide a practical effective method by which to introduce pollution prevention practices to a number of different audiences statewide. It's national recognition allows Extension professionals "a foot in the door" when seeking to help land use managers improve practices. Additionally, guidance for the national office minimizes replication and reduces development time for locally adapted risk assessment materials.

- Finally, NMCES recommends that funding priority be given to those Extension Water Quality projects that were awarded competitively for FY99.

New Mexico currently has two very promising such projects. The aforementioned "New Mexico Tribal Lands Water Quality Project" is being implemented through the Indian Extension of fices of the Shiprock Navajo, Jicarilla Apache, and Zuni tribes. Activities in progress and planned for these locations include in-school training activities, wellhead protection workshops, irrigation management demonstrations and training, public service announcements for household hazardous waste management, and more. Extension involvement in tribal water commissions, and counsels is an integral part of this project.

"Protejer E1 Rio" (Protect the River) is a Home*A*Syst oriented project targeted for eight counties along the Rio Grande from Taos to Truth or Consequences, NM. The project has been modeled after a very successful project with the City of Las Cruces, Dona Ana County entitled "Don't Dump It". It has as it's primary goal a

significant reduction in household hazardous waste inflow to municipal wastewater treatment plants that discharge to the Rio Grande. This goal was accomplished by the Don't Dump It campaign. City officials, and utility managers up and down the river are cooperating in "Protejer E1 Rio" in the belief that we can accomplish similar results as in Las Cruces.

Each of these projects were projected for three year funding, with FY99 being the first year. Technicians for the 'Tribal Lands" project have been hired and have begun program delivery. Home*A*Syst materials, brochures, PSA's and scores of other materials have been or are being developed for "Protejer El Rio" for a coordinated Earth Day 2000 delivery date. Continued funding of these projects is imperative to the improvement of practices, effectiveness of first year funding, and the reputation of New Mexico Cooperative Extension Service as being good for our promise to deliver.

In conclusion, NMCES wishes to express concerns over the fiscal difficulties the transition from 3d funding to Section 406 funding is expected to create with regard to faculty salaries. Food Safety, Water Quality, and Pesticide Impact Assessment are important Extension programs in New Mexico. The 3d monies that have for some time supported the salaries of the faculty providing leadership to these programs is now at risk of being lost. Along with that is the potential of having to terminate or re-assign professionals who are most suited to continuing these programs at some level. We respectively urge CSREES to adopt a mechanism by which to minimize unnecessary program gaps due to the loss of faculty. The lead time for the transition to Section 406 is insufficient to make necessary fiscal and faculty changes that will be critical to retaining these individuals.

We thank you for the opportunity to comment. NMCES is ready and willing to assist in a successful transition in the coming months.

/s/
Billy Diction, Interim Associate Dean and Director

/s/
Ronnie Byford, Department Head, Plant Sciences Dept.

/s/
Craig Runyan, Extension Water Quality Program Coordinator

Name: Dr. Peter Barry, Chair
Organization Representing: Council on Food, Agricultural and Resource Economics

Public Comments
By: Dr.Peter Barry

UNITED STATES
DEPARTMENT OF AGRICULTURE

Cbair, Council on Food, Agrkultural and Resouree lDconomics
To the
Cooperative State Research, Education, and Extension Sernce
(CSREES)
U.S. Department of Agriculture
On the
Implemenhffon of Section 406 of The Agricultural llesearch, 13xtension
and Educedon Act of 1998 (1998 AREE:RA)

Thank you for the opportunity to submit comments on behalf of the Council on Food Agricultural and Resource Economics (C-FARE) regarding USDA's implementations of Section 406 and the new Cooperative State Research, Education, and Extension Service (CSREES) competitive grants program that integrates research, education, and extension fimctions.

First let me take this opportunity to explain more about C~FARE. C-FARE is a nonprofit, non-partisan organization dedicated to strengthening the national presence of the agocultural economics profession. C-FARE's four primary goals include;

1. To identify key economic issues, establish priorities, and seek support for research, extension, and academic instruction;

2. To help agacultural economists contribute more effectively to public and private sector decisions;

3. To work with other professional organizations to foster support for agricultural research, and

4. To publicize agricultural economics contributions to solving irnportant societal issues.

As you can see, Congress's reason for creating the Integrated Accounts and the goals of C-FARE go hand-in-hand. This allows our perspective on the new Integrated Accounts to be especially unique and critical to this process.

As you know, the original intent oiCongress while they were establishing the integrated account was to encourage competitive research and education that is applied problemsolving. I would like to urge the USDA and CSREES to recognize the need for economics while you finalize the Implementation of Section 406. Economics would be a perfect match for Congress's reason for creating this account, because economic activities encompass the broad interests of the agricultural industry such as water quality, food safety, pesticide impact assessment, FQPA, and methyl bromide. There has been much ongoing research work and extension education conducted at the state level. This research needs to be mirrored at the national level.

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Economics provides fundamental knowledge about the people and institutions that make up our food and agriculture system. And while we believe that the economics research currently supported by USDA grants is of high value and quality, it represents only a shadow of the potential contributions the science of economics can offer society and the scientific community, research areas relevant to the objectives ofthe Section 406 Authority.

We need to increase the opportunity for social science funding and this can be done within the Section 406 authonty. This will generate flew knowledge about the economic and social consequences of environmental regulation. Again, this is why I would line to voice my strong support for the additional need for economists and social scientists to padicipate in such additional programs as the Section 406 of the Agricultural Research, Extension and Education Act of 1998.

Name: John R. Kershaw
Organization Representing: Imperial Valley Conservation Research Center Committee, P. O. Box 1375
Brawley, CA 92227
Telephone: (760) 334-1184
Fax: (760) 344-7951

December 15, 1999

Ms. Terri Joya
Competitive Research Grants & Awards Management
U.S. Department of Agriculture
CSREES STOP 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

REFERENCE: Integrated Research, Education and Extension Competitive Grants Program

On behalf of the producer-based Imperial Valley Conservation Research Center Committee, which for over 50 years has contributed funding and manpower to augment agricultural research at the Brawley Research Center in a unique private community-Federal partnership, I am submitting comments relative to the topic referenced above.

We urge the CSREES to base its competitive grants program on the merits of the objectives and research involved regardless of whether the request originated through the land grant university system. Applications for research grants that are producer-driven should be given a priority, especially if the application would benefit a local industry or community that is primarily dependent upon agriculture (such as Imperial Valley, California).

Here in the Imperial Valley there is the Imperial Valley Research Center at Brawley, CA. that is partially supported by the ARS and also there is the Meloland Field Station that is supported by the University of California. Both stations are critical to the sustainability of the region's agricultural output which is one of the most diversified in the world. Traditionalists might have a tendency to feel that requested CSREES assistance might be more suitably located at the Meloland Field Station because of its university/extension affiliation. However, the Brawley Research -Center has a prouc history of accomplishment in a tremendous variety of research that has benefited not only the region but also many areas around the world. Though the Brawley Center has ARS support, this support is limited and has not had an increase in many years.

I am enclosing a copy of an laformation brochure that further explains about the Brawley Center.

I wish to add that the Brawley Center maintains a good working relationship with the Meloland station. As an example, an adjunct of a promising new cattle feed (Elephant Grass) is being researched at the Meloland station, i.e., the comparative feeding value of elephant grass in bovine diets. We have, on our committee representatives of the University of California staff in order to prevent undesired duplication and also to foster a true partnership in facet as well as in theory.

There is a perception that CSREES competitive grants cannot be accomplished except through the land grant university system. We feel that agricultural research projects funded by the Federal treasury should not be restricted to or have their destiny determined solely by a land grant university, especially in California where we have a tremendous cross-section of educational facilities that include Community colleges and the State colleges as well as the land-grant universities.

If such grants are to be routed solely through the land grant system, then the USDA should institute an appeal mechanism, particularly for producer-based applications so the research projects can stand on their own merits rather than on those that are purely oriented to or determined by land grant universities.

Sincerely,

/s/
John R. Kershaw President

Name: Daniel D, Godfrey
Organization Representing: Chair of the Extension Committee on Organizational and Policy (ECOP) of the National Association of State Universities and Land-Grant Colleges (NASULGC)

Thank yo for the opportunity to officially comment on the implementation of the Integrated Research, Education, and Extension Competeive Grants Program, more specifically known as Section 406 of

Agriculture, Extension, and Education Reform Act of 1998 (AREERA). The comments I offer today are done so as Chair of the Extension Committee on Organization and Policy (ECOP) of the National Association of State Universities and Land-Grant Colleges (NASULGC) which represents the 75 Land-Grant University Cooperative Extension Services in our nation-vvide Extension System. I am also the Dean of Agriculture at North Carolina A&T State University and the Administrator of the Cooperative Extension Service and Agriculture Experiment Station.

The Section 406 authority was quite well known by our State Extension Services administrators from the time it was considered for inclusion in AREERA. The concept and intent of the Section 406 was generally accepted by the State Extension Services. However, these same people and others in the Extension System have three major concerns.

First, when the basis for funding the account appeared in the FY 2000 Executive Budget, the State Extension Services at the administrative and program levels expressed significant concern. The primary concern was the movement of existing 3(d) program fiunds for three high prionty program into this account. Food Safety, Water Quality and Pesticide Impact Assessment are not minor programs in the Extension System; quite the contrary. The main concern is that a significant amount of these 3d program funds were long time monies that are currently being used for faculty salaries and operating expenses for those providing the specialized leadership ant continuity for these programs. It is these faculty that would have provided leadership for an expanded program in these areas with the additional funds that Congress appropriated to this account. In too many situations, these faculty will or are being terminated because the long standing funding source for these very high priority programs is now uncertain. This will be a difficult transition year for these three programs and for the faculty who have provided the leadership for these programs over the last several years. We respectively ask the CSREES to use every possible option available to help the State Extension Services through this transition year to minimize any unnecessary program gaps because the lead time to make fiscal and faculty adjustments is not available.

The second significant concern that we offer comments is the manner in which the Section 406-account fund is administered. There are two aspects of this matter. One is the time frame from when CSREES has access to these funds and the awarding of these funds to those who are successful in the competitive grant process. It is imperative that this time frame be something considerably less than 12 months. We recommend this time frame be no more than 4-6 months. Operating with year to year funding for educational programs is tenuous enough in terms of quality programming and faculty retention-without adding the burden of learning toward the end of the year that you may or may not have the needed funding.

The other important aspect of administering this fund is how grant prposals are rewiewed. Very specifically we recommend a merit review process, as defined in the AREERA, rather than the peer review process. The latter has a long track record of being very time consuming. Initiating a new

merit review process is an opportunity to streamline the decision-making and to assure not only quality of programs, but also stress relevance to the real world issues. After all, relevance appears to be one of the intents of Section 406. We stand ready to provide advice, guidance and faculty support in your deliberations on the merit review process design and subsequently implementation.

The merit review process will allow states to use local input rather than all guidelines coming from the federal level. Many water quality issues are regional in nature and are not necessarily national in nature, though some such as the "Hypoxia" issue do involve between 20 and 37 states, depending on how many states one considers to be in this water shed.

Lastly, we recommend the funding allocation process be managed by the CSREES either by a specific unit for this purpose or by the agency's relevant program units. We are not supportive of the Section 406 account being administered in the same unit that administers the National Research Initiative (NR1). Our reason is that the purpose of the Section 406 funds is so different than those currently administered under the NRI, which is primarily basic/fundamental research. Section 406 funds are intended for more action-focused research and education. Establishing a streamlined, action focused review process could serve as a hallmark of state/federal partnership review process that would involve both entities of the partnership to the fullst extent permissible under current laws and regulations. A process that best serves the agency, the state partners, and most importantly, the public, is very important because it is likely more and more federal funding appropriated to CSREES to administer will be in the competitive grants mode. It is for these reasons, we would discourage the CSREES flom administering these funds on a regional basis or some variation thereof. Why have several entities that will need duplication of merit review systems and fiscal accounting? One well managed review system with maximum involvement of the partnership seems most efficient and effective, and can accomplish the intentions of Section 406, namely integration, multi-state, multi-institutional and an interdisciplinary focus on the significant national, state and local issues. The manner in which the competetive portion of the Water Quality monies for Extension has been administered for nearly a decade is a prime example of this recommendation working very well.

We appreiate this opportunity to present our general thought and specific recommendations on the implementation of Section 406. The State Extension Services stand ready to assist in the successful implementation of this budget authority.

Daniel D. Godfey

Name: Charles L. Norman, Dean
Organization Representing: Agriculture Extension Service, The University of Tennessee Institute

UNITED STATES
DEPARTMENT OF AGRICULTURE

of Agriculture, Office of the Dean, Post Office Box 1071, Knoxville, Tennessee 37901-1071
Telephone: (865) 974-7114
Fax: (865) 974-1068

December 13, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES
Stop 2240
1400 Independence Avenue, SW
Washington, DC 20250-2240

RE: Section 406 of the Agricultural Research, Exrension and Education Act of 1998

Dear Ms. Joya:

This correspondence is to endorse the recommendations on implementing the 406 program submitted by the water quality NALT at the December 2 hearing and by Dr. George F. Smith of our staff via e-mail on December 9.

The formula funds for the water quality, food safety and pesticide impact assessment programs supported educational programming that significantly benefitted the people of Tenessee. The impat on our clienetele of the loss of these funds through a competitive grant system is a concern. Money is not available within out very lean budget to replace these funds.

The change in philosophy a competitive grant system represents is also a concern. We become simply another applicant for grant money under the 406 program. This is a fundamental change in the federal-state-local partnership which is part of the genius of the Cooperative Extension system.

Sincerely,

/s/
Charles L. Norman
Dean

cc: Dr. Ray Humberd
Dr. George Smith
Dr. Clark Garland

UNITED STATES
DEPARTMENT OF AGRICULTURE

Name: Susan P. Whitney, 912 Rockmoss Avenue, Newark DE 19711
Organization Representing: Chair, Delaware Govemor's Advisory Committee

December 8, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES
STOP 2240
1400 Independence Avenue, SW
Washington, D.C. 20250-2240

Dear Ms. Joya,

I am the Chair of the Delaware Govemor's Advisory Committee on Pesticides. Our task is to inform the Secretary of Agriculture, Mr. Jack Tarburton, on matters concerning the use of pesticides in the state. Mr. Tarburton, in turn, conveys the needs and concem about pesticides to our Governor. I am writing in regards to the Section 406 of the Agricultural Research, Extension and Education Reform Act of 1998 (AREERA) related to the Pesticide Impact Assessment Program. Under these new guidelines, to obtain funding, individuals will be required to submit grant proposal to a competitive process. I urge you to ensure that this is done in a manner to make sure that each state is able to maintain a PIAP program. It would not be possible for growers in Delaware to be served adequately by a PIAP program based in Florida, Michigan, New York, Califomia or any other state. We need to have a PIAP program housed here in Delaware and administered within the state. We need to have a local PIAP program that is accessible to the growers of the state, that answers to their needs, and that works though the Cooperative Extension System that has successively served the citizens of this state for many years. I urge you to give this concem your consideration. Thank you.

Sincerely yours,

/s/
Susan P. Whitney
Chair, Delaware Govemor's Advisory Committee

cc: Mr. Jack Tarburton, Secretary of Agriculture

UNITED STATES
DEPARTMENT OF AGRICULTURE

Name: Ronda E. Hirnyck
Organization Representing: University of Idaho, Department of Plant, Soil, and Entomological Sciences, Pesticide Program Coordinator, Boise center, 800 Park Boulevard, Boise, Idaho 83712
Telephone: (208) 364-4023
Fax: (208) 364-4035
E-mail: rhirnyck@uidaho.edu

December 15, 1999

Ms. Terri Joya
Competitive Research Grants and Awards Management
USDA/CSREES
STOP 2240
1400 Independence Avenue SW
Washington D.C. 20250-2240

SUBJECT: Comments To USDA/CSREES Section 406 - Request For Proposals

Dear Ms. Joya:

The University of Idaho appreciates this opportunity to provide written comments regarding the CSREES Section 406 funding changes and request for proposals (RFP). Our comments will address Section 406 as it relates to PIAP. We wish to give you a perspective from a land grant institution where agriculture is still one of the top three industries in the state and minor crop production is a significant factor.

We have several points we would like to make and encourage you to consider when determining the criteria for the RFP. We believe the following points are valid to our Institution and the agricultural community we serve. We feel these points will help provide consistency in the program implementation to our clientele and continue the efforts we have contributed, thus far, in the past 23 years of PIAP.

1. **Multi-year proposals should be considered.** This will allow for program continuity, which is crucial during this implementation phase of FQPA. The continuity allows us to train and maintain staff and students to assist with the program work. This multi-year concept also allows time for more complex areas of work such as transition strategies for sustainable pest management practices, pesticide use surveys and other projects that may require more time to complete. These type of projects rely on trust and understanding between our clientele and us. The multi-year approach provides time for these working relationships to be built.

2. **Single point of contact for each state.** Having this type of infrastructure will allow for information to flow easily from USDA to the states and visa versa. If there are multiple requesters, it will be very difficult for all of the relevant data to be coordinated by our state. The single point of contact allows the principle investigator to have more flexibility when determining the data needs and means of measurement.

3. **All states and territories need to be involved.** We urge you to develop the RFP that will involve as many states and territories that want to participate. If only a few of the states, with larger programs, participate, the program will not cover the many different state issues and multiple crops. We believe that minor crop and minor crop issues, especially, would suffer from lack of participation by these smaller states.

4. **Encourage the outreach component to continue for these programs.** We believe this has been the strength of PIAP. The State Liaisons have been successful at leveraging PIAP funding with other programs in order to coordinate pest management activities. This work has led to successful partnerships and interactions with individual growers, commodity groups, University specialists, other land grant institutions and USDA. Supporting and crediting these unique partnerships should be part of the RFP.

5. **Do not delay the RFP and subsequent funding.** If funding delays occur, some states will be forced to close down their PIAP program and infrastructure. We believe if this occurs, USDA would lose the valuable partnerships that have been built up over the past 23 years. This will also affect the ability of some states to respond to FQPA implementation issues. We believe minor crops will have the most impact from this disruption. In a state like Idaho, agriculture is dependent upon minor crop production and the availability of pest management information.

In closing, the University of Idaho strongly urges you to find ways to include in the RFP mechanisms for providing the continuity and outreach components of the PIAP program that have made it so successful, in the past.

Sincerely,

/s/
Ronda E. Hirnyck
Pesticide Program Coordinator

cc: Michael Weiss, Department Head
LeRoy Luft, Director of Cooperative Extension, Associate Vice Provost of Outreach

Name: Dr. Jesse LaPrade, Extension Environmental Specialist
Organization Representing: Alabama Cooperative Extension System, 210 Extension Hall, Aurburn University, Alabama 36849-5647
Telephone: (334) 844-5533
Fax: (334) 844-9022
E-mail: jlaprade@acesag.auburn.edu

MEMO

To: Terri Joya
USDA-REE-CSREES-PS-CRGAM
From: Dr. Jesse LaPrade, Extension Environmental Specialist
Date: December 14, 1999
Subject: Farm*A*Syst/Home*A*Syst program

I believe a mechanism should be established to allow FAS/HAS to be continued as a coordinated national program.

Name: Mark L. McFarland, Chair
Organization Representing: SREWQPC, Associate Professor and Extension Specialist, Texas Agriculutural Extension Service, College Station, texas 77843-2474

Public Comments
on the
Implementation of Section 406
of
The Agricultural Research, Extension and Education Act of 1998
to the
United States Department of Agriculture
Cooperative State Research, Education and Extension Service
by the
Southern Region Extension Water Quality Planning Committee

December 17, 1999

Water quality is a leading public concern in every state of the Southern region, and throughout the country. The Southern Region Water Quality Planning Committee (SREWQPC) was formed in

1989 to share expertise and facilitate regional coordination and communication. It is composed of water quality coordinators from the 13 Southern region states the Virgin Islands and Puerto Rico. The SREWQPC has been a highly effective regional initiative that has contributed substantially to both individual state and national water quality programs. The transition of ffinding from the Smith-Lever 3(d) account to the Section 406 Integrated Activities account will have a significant functional impact on the SREWQPC, its program activities and its members states. To demonstrate the extent of these effects, we have attached a summary

We offer the following recommendations regarding implementation of the Section 406 Competitive Grants Process:

- The National Strategic Plan for Extension Water Quality which has been developed and endorsed by Water Quality Coordinators for all states and territories should be adopted as the guidance for the Section 406 Integrated Water Quality Program.

- The concept of program "integration" as recommended by Congress should be broadly dehmed to achieve integration across the entire national program rather than each project. Individual projects should not be required to integrate any two or all three elements. National integration should support a coordinated program of extension and formal education projects with carefully targeted research efforts.

- Research funded under Section 406 should be limited to applied research designed to complement and enhance extension and education delivery.

- The RFP process must be developed and processed expeditiously to minimize program discontinuity.

- We strongly recommend that CSREES implement as soon as possible a transition procedure to provide interim funding which will minimize overall program disruption. Immediate attention to this essential need will provide effective program continuity, maintain existing highly skilled and qualified personnel and assure consistent program delivery to clientele.

- Objective evaluation criteria should be established with input from experienced research, education and Extension professionals from across the nation. These criteria should be included in requests for proposals.

- All review panels must be composed of a well-balanced mix of experienced Extension, research and education professionals, which represent all regions of the nation.

- Selection and management of projects for funding under 406 should not be placed in the NRI.

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- We recommend the use of multi-year projects with full funding awarded upon project approval. This procedure will promote optimum program continuity by stabilizing faculty and technical support personnel and encouraging full-scale program implementation. It also will enhance leveraging opportunities with other agencies and organizations by establishing well-defined, consistent program activities.

- We recommend continued support for effective national efforts including the national water quality database at Purdue University and the Farm*A* Syst/Home*A* Syst program.

- Extension should be defined as the Cooperative Extension system housed in 1862, 1890 and 1994 land grant institutions. Continuing education efforts by non-land grant and land grant institutions should be included in the education element.

- We recommend that Section 406 provide a mechanism for emergency responses to critical issues. This characteristic of the former Water Quality IPS funds provided unique flexibility and strength which enable Extension and the LGU system to provide leadership during urgent need.

- The 406 program must provide a mechanism to foster and support regional efforts such as the SREWQPC, which has proven to be tremendously effective for regional coordination and programming.

Thank you for the opportunity to provide comments regarding this important new program. Please let us know if you have any questions regarding these recommendations.

Mark L. McFarland
Chair, SREWQPC
Associate Professor and Extension Specialist
Texas Agricultural Extension Service
College Station, Texas 77843-2474

* *

SOUTHERN REGION WATER QUALITY PROGRAMS

SUMMARY OF IMPACTS
(Information for 9 states and the Virgin Islands)

Issue: Impacts of Reallocation of Smith-Lever 3(d) Funds on Leveraging, Program Delivery and Human Resources.

HERITAGE REPORTING CORPORATION
Official Reporters
1220 L Street, N.W., Suite 600
Washington, D.C. 20005-4018
(202) 628-4888
hrc@concentric.net

Funding Impacts - Loss of Direct and Leveraged Program Implementation Funds:

- Total Losses: $ 4,566,822 from federal, state and local projects.

Reduced Contact with Citizens and Communities:

- Direct Educational Program Delivery:
    - 64,856 fewer direct citizen contacts
- Information Dissemination (electronic, media, copy):
    - 891,168 individuals not reached by water quality information
- Agent and Staff Training Opportunities
    - 1,868 professionals not trained

Reduced Potential for National, Regional. Multi-State and Interagenev Coordination: These partnerships will be severely impacted or eliminated.

- National Water Quality Conferences
- Environmental Protection Agency
- Natural Resources Conservation Service
- State Conservation Agencies
- State Environmental and Natural Resources Agencies
- Coastal Zone Management Programs
- Community and Industry Partnerships

Human Resource Costs - Loss of Highlv Trained Educators and Support Personnel:

- 22.7 FTEs Personnel responsible for program development and delivery. Eliminates EPA Liaisons for Region 4 and Region 6.

Program Losses - Established Regional Linkages Will Be Eliminated:

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- Southern Region Extension Water Quality Planning Committee - Established in 1989 and has facilitated outstanding regional coordination of water quality programs.

- Southern Region Water Quality Workshop - biennial water quality training and technology transfer conference for state and local educators. Annual attendance of 250 individuals from across the nation and abroad.

- Comprehensive regional and state educational programs which enable citizens to protect, conserve and enhance water resources for human health and natural ecosystems.

HERITAGE REPORTING CORPORATION
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1220 L Street, N.W., Suite 600
Washington, D.C. 20005-4018
(202) 628-4888
hrc@concentric.net

UNITED STATES
DEPARTMENT OF AGRICULTURE

In the Matter of:)
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SOLICITATION OF INPUT FROM)
STAKEHOLDERS REGARDING THE INTEGRATED)
RESEARCH, EDUCATION AND EXTENSION)
COMPETITIVE GRANTS PROGRAM;)
PUBLIC MEETING AND DELEGATION OF)
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THE UNITED STATES DEPARTMENT OF AGRICULTURE

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Thursday,
December 2, 1999

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Jamie L. Witten Federal
Building
12th & Jefferson Drive, S.W.
Washington, D.C. 20250

The conference commenced, pursuant to Notice, at 9:03 a.m., before the United States Department of Agriculture.

MODERATOR:

DR. CHUCK LAUGHLIN

ON BEHALF OF WATER QUALITY:

DR. TOM FRETZ
Dean of the College of Agriculture
University of Maryland
1106 Symons Hall
College Park, Maryland 20742-5565
(301) 405-2072

DR. ERIC NORLAND

National Advisory/Leadership Team
Ohio State University Extension
School of Natural Resources
2021 Coffey Road
Columbus, Ohio 43210
(614) 292-6544

MARY-ELLEN DEVITT
Project Coordinator
SAES/USDA-CSREES National Environmental Initiative
4321 Hartwick Road, Suite 120
College Park, Maryland 20740-3210
(301) 403-4244

DAVID SALMONSEN
American Farm Bureau
600 Maryland Avenue, S.W.
Suite 800
Washington, D.C. 20024
(202) 484-3621

ON BEHALF OF FOOD SAFETY:

MERLE PIERSON
Professor of Food Microbiology/Safety
Department of Food Science & Technology
Virginia Polytechic Institute & State University
Blacksburg, Virginia 24061
(540) 231-8641

JEFF RICHARDS
Project Coordinator Safe Agriculture and Food
Through Education and Research Initiative (SAFER)
SAES/USDA-CSREES National Environmental Initiative
(SUNEI)
4321 Hartwick Road, Suite 120
College Park, Maryland 20740-3210
(301) 403-4243

BARBARA STOWE

H. DEAN SUTPHIN
Associate Dean and Director of Academic Programs
Cornell University
140 Roberts Hall
Ithaca, New York 14853
(607) 255-3081

BERNADETTE DUNHAM
American Veterinary Medical Association

ON BEHALF OF PEST MANAGEMENT:

RICK MELNICOE
Western Region Coordinator
Pesticide Impact Assessment Program
Department of Environmental Toxicology
4138 Meyer Hall
University of California
Davis, California 95616-8588
(530) 754-8378

O. NORMAN NESHIEM
Southern Region Coordinator
Pesticide Impact Assessment Program
Building 847, Box 110710
University of Florida
Gainesville, Florida 32611-0710
(352) 392-4721

LEONARD GIANESSI
National Center for Food and Agricultural Policy
1616 P Street, N.W., First Floor
Washington, D.C. 20036

DR. JOHN E. AYERS
The Pennsylvania State University
Professor of Plant Pathology
308 Buckhout Laboratory
University Park, Pennsylvania 16802
(814) 865-7776

CATHERINE H. DANIELS
Pesticide Coordinator/PIAP SLR
Pesticide Information Center/Food & Environmental
Quality Lab
WSU Tri-Cities
2710 University Drive
Richland, Washington 99342-1671
(509) 372-7495

ELDON ORTMAN
eeo@aes.purdue.edu

LARRY ELWORTH
Executive Director
Center for Agricultural Partnerships

VERNON HIGHLEY
Highley Associates

ON BEHALF OF OTHER ISSUES:

John C. Nye
Dean of the College of Agriculture
University of Delaware

DR. JAMES R. CLARK
AASCARR
Box 60267
Canyon, Texas 79016
(806) 651-2585

FERD HOEFNER
Sustainable Ag Coalition
110 Maryland Avenue, N.E.
Washington, D.C. 20002
(202) 547-5754

DR. JACQUELYN MCCRAY
New Extension Complex
Room 177
1200 University Drive, Box 4990
Pine Bluff, Arkansas 71601
(870) 543-8529

DR. SAM DONALD
Regional Research Director
University of Maryland Eastern Shore
Room 1103, Early Childhood Research
Princess Anne, Maryland 21853
(410) 651-6074

DAVID MACKENZIE
Executive Director Northeastern Association of State Experiment Station Directors (NERA)
SAES/USDA-CSREES National Environmental Initiative (SUNEI)
4321 Hartwick Road, Suite 120
College Park, Maryland 20740-3210
(301) 403-4238

DAN GODFREY
Extension Committee on Organization and Policy

National Association of State Universities and Land-Grant Colleges
Webb Hall, Room 111
1601 East Marnet Street
Greensboro, North Carolina 27411
(336) 334-7979

I N D E X

	PAGE
OPENING STATEMENT OF DR. CHUCK LAUGHLIN	7
TESTIMONY OF DR. NORLAND	10
TESTIMONY OF DR. TOM FRETZ	14
TESTIMONY OF MARY-ELLEN DEVITT	25
TESTIMONY OF DAVID SALMONSEN	30
TESTIMONY OF DR. MERLE PIERSON	38
TESTIMONY OF JEFF RICHARDS	45
TESTIMONY OF BARBARA STOWE	52
TESTIMONY OF H. DEAN SUTPHIN	58
TESTIMONY OF BERNADETTE DUNHAM AMERICAN VETERINARY MEDICAL ASSOCIATION	60
TESTIMONY OF RICK MELNICOE	63
TESTIMONY OF O. NORMAN NESHIEM	66
TESTIMONY OF LEONARD GIANESSI	71
TESTIMONY OF DR. JOHN E. AYERS	75
TESTIMONY OF CATHERINE H. DANIELS	79
TESTIMONY OF ELDON ORTMAN	83
TESTIMONY OF LARRY ELWORTH EXECUTIVE DIRECTOR OF THE CENTER FOR AG PARTNERSHIPS	87
TESTIMONY OF VERNON HIGHLEY HIGHLEY ASSOCIATES	90

TESTIMONY OF JOHN C. NYE 91

TESTIMONY OF DR. JAMES R. CLARK 95

TESTIMONY OF FERD HOEFNER 98

TESTIMONY OF DR. JACQUELYN MCCRAY 103

TESTIMONY OF DR. SAM DONALD 108

TESTIMONY OF DAVID MACKENZIE 113

TESTIMONY OF DANIEL D. GODFREY 121

P R O C E E D I N G S

(9:03 a.m.)

DR. LAUGHLIN: Good morning. Can you all hear me in the back? No? If need be I'll use it, otherwise...

We sincerely appreciate each and everyone of you making time in your schedules to come in because I know that many of you travelled a long distance to come in and share your thoughts on Section 406. We really appreciate it.

For any of you who may think that you're not in the right place, we are here to discuss the Section 406, which is Integrated Research, Education and Extension Competitive Grants Program.

The kind of format that we will follow is that several of you have registered but there may be people here who have not registered to speak in a particular time or section and we will provide opportunity for you. It may get a little ragged there for awhile but let's not worry about that.

Also, our intent is to get a transcription of all the comments that are made here. We would ask that

if you could leave a copy of your transcript, if you have it, if you don't, no problem. We will have -- our intent is to have the transcripts of this session on the Web by next Friday, December 10. So, that's the way we would work it.

Also, for those of you who would rather submit written comments, written comments will be accepted through December 17. So, there may be some things that you hear and you start thinking when you get back and say, "I really would like to include these kinds of comments."

You know, Section 406 really is a continuing evolution of the reorganization that occurred in 1994, which brought together cooperative extension and CSRS and brought these together. It is a continuing congressional intent that occurred in, I like to say, our era of 1998, which brought together the Section 406, which is the integration of research, teaching and extension into a competitive grants program.

Now, I'm completely aware that with an opportunity like this there is some downside to opportunity. I have a rock that somebody gave me. I

collect rocks. This rock, on it says, "In the midst of difficulty lies opportunity." I hope that we can look for those kinds of opportunities because I think there are some very real opportunities in this integrated initiative. One is that there has been no loss of funds. There has been a repackaging of the funds but there has been no loss of funds.

Secondly, if one looks at where increases occurred for our agency this is the only place that we really had real increases. I think it reflects the interest in OMB and the interest, concurrent interest, within Congress, which supports that.

It also provides us with an opportunity to co-mingle extension and research funds. Many states have a difficulty, perceived or real, in the bringing together of extension and research activities. This gets us beyond that so we have an opportunity to do that. I think it also broadens the base of who can participate in these kinds of funds so that we can bring together the very best minds throughout the university and college systems.

Now, there is something that you need to be

aware of. It goes back and says that it broadens the base to colleges and universities as described -- I never thought I'd talk like this -- Section 1404 of the Higher Education Act of 1977, which states, among other things, that universities and colleges are described as accredited colleges or universities that offer a B.S. or higher degree. So this means that some of the things that we might want to do with some of the 1994 institutions is going to involve collaboration. Perhaps we haven't had collaboration before.

One of the other issues that we're acutely aware of is the whole issue of when you go from a block grant to a competitive grant is the issue of continuity. We have sent a series of questions looking for clarification to the lawyers where we're trying to see if we can make five year grants with annual appropriation of funds, which would then provide a mechanism for some continuity in the process.

The areas that are included in this, just as a review, is, one, the area of Water Quality; secondly, Food Safety; third, the Pesticide Impact Assessment program; fourth, Crops at Risk from FQPA implementation;

also the FQPA Risk Mitigation Program for Major Food Crop Systems; and the Methyl Bromide Transition Program. Section 406 includes all of these and moves it into a competitive basis.

Are there any questions before we go on? They had scheduled me for 25 minutes. I never speak that long.

(Laughter.)

Blood accumulates in your gluteus maximus way before then.

There are none. Tom isn't here yet, is he, Dave? Have you seen him?

DAVE: No.

DR. LAUGHLIN: What we may do is go ahead and we would ask Eric Norland to come forward. The podium is yours. You can even have the mike.

DR. NORLAND: Good morning. Thank you for the opportunity this morning to provide some comments relative to Section 406 and the CSREES Water Quality Program.

My name is Eric Norland and I'm here this morning representing the National Advisory and Leadership

Team for the Extension Water Quality Program. This team represents the leadership for a national network of extension water quality coordinators established by base program funding. it was created by USDA/CSREES as part of the Extension Water Quality Strategic Plan. This team has one representative from each extension region and the 1890 and 1994 institutions.

Some background information is useful in setting the stage for our recommendations. In 1997 CSREES called together a team to create a national strategic plan for extension water quality. This plan, which was created in 1997, has been endorsed by the water quality coordinators of all the states and territories.

This plan has seven comprehensive goals, reaching under served audiences, which intentionally was listed as goal number one; educating the public about watersheds and aquifers; preventing pollution through the use of best management practices; educating public policy makers; promoting individual actions to protect water quality; promoting volunteerism; and developing partnerships and liaisons with other agencies and organizations.

Our first recommendation is that these goals and this strategic plan be adopted as the guidance for Section 406 Integrated Water Quality Program.

Our second recommendation is that integration be broadly defined as integration across the national program, rather than each individual project. We do not believe it was the intent of Congress to impose a program structure requiring each and every project to have a three-way integration. We believe Congress intended only to promote integration where it is feasible and effective. This concept of national integration supports a coordinated program of extension and formal education projects with carefully targeted research that in total comprises and integrated program.

We are particularly concerned that it will be difficult to develop an effective extension education program under Section 406. Those preparing the RFP and those preparing and evaluating the proposals must understand extension thoroughly, they must understand that extension education is not just the preparation of fact sheets and popular reports after a research project is finished. Extension is an educational process

characterized by non-formal and formal education programs that involve the learners throughout the program development process and use appropriate teaching strategies for those learners, be they youth or adult.

We recommend that research funded under Section 406 be limited to applied research targeted to the goals of those strategic water quality plan.

We are concerned that CSREES will have difficulty establishing a well balanced review panel. Extension programs, research projects, and university curricula are planned, conducted, and evaluated differently. Each has its own model and none should be expected to fit into the model or mold of another. The review panel must therefore draw on experienced professionals from extension and higher education, as well as research.

As reflected in the first goal of the National Strategic Water Quality Plan, the program must reach under served minority audiences. We recommend a program that coordinates the 1862, 1890, and 1994 Land Grant Institutions. This program has shown our efforts to date that it can reach those audiences with important

environmental and health related water quality education programs.

Finally, implementation of Section 406 must provide a mechanism to address critical emergency issues as they develop. Of all the functions and capabilities that potentially could be lost by not funding the Extension Water Quality Base Program the ability to respond is the most serious.

In the past extension has responded rapidly and made a difference in the Pfiesteria outbreak in the Chesapeake Bay and Albemarle Sound, during the Mississippi River floods of 1993, and when Hurricane Floyd flooded North Carolina, pouring millions of gallons and tons of animal manure into rivers and estuaries.

In summary, we recommend the following, that the goals of Extension Water Quality Strategic Plan be adopted as the guidance for Section 406; that integration be applied to the overall program, not three-way integration of every project; that research be limited to applied research that is carefully targeted to support the goals of the plan; that review panels be balanced to include extension and higher education professionals;

that under served minority programs be maintained; and that the emergency response capability be maintained.

We have many more recommendations beyond what we have time to share today so it is our intent to provide written input to you by December 17.

On behalf of the National Network of Extension Water Quality Coordinators and the National Advisory/Leadership Team I thank you for this opportunity this morning to present these comments and recommendations.

DR. LAUGHLIN: Thank you very much, Eric. I'd like to, rather than going onto Mary Ellen, the next person, I'm going to ask Dr. Tom Fretz, who asked to come in early because of the pressing schedule that he is on, to share his thoughts on general issues. Tom.

DR. FRETZ: You caught me a little bit off guard here this morning in that I was expecting to be here a little bit later, so I guess the remarks went a little quicker. I must admit, I need to reset my watch here. I came in from Dubai in the United Arab Emirates last night late so I am still on -- I'm not sure whose time I'm on. My watch is certainly not on Eastern Standard Time.

I'm Tom Fretz, Dean of the College of Agriculture and Natural Resources at the University of Maryland, Director of the Maryland Cooperative Extension Service, and Director of the Maryland Cooperative Agricultural Experiment Station. My responsibilities extend to the three primary functions of a contemporary Land-Grant University -- teaching, research, and extension.

I am also currently the chair of the NASULGC Board on Agriculture. However, I'm here today not as a representative of the Board on Agriculture, but rather as an administrator of state-based programs intended to serve the needs of my institution's broad constituency.

I appreciate the opportunity to provide comments to you on the implementation of Section 406 of AREERA. I have given this matter a great deal of thought over the last several months and I'd like to share some thoughts with you regarding Section 406, and recommend a process which I believe could have significant impacts on our ability to address critical issues facing the agricultural community.

In stating this, I see two possible and

fundamental options for implementing Section 406, each with has its variations. The two options are, I believe, a centrally organized initiative and, two, a distributive program with your partner institutions. It is really the latter which I believe will have the greatest impacts on our partnership, bringing to the table new stakeholders and allowing us to address issues at the local level.

Centralized organization may have appeal to some, especially those interested in investing in the discoveries of fundamental science, as we now do with the extraordinarily well thought through National Research Initiative - Competitive Grants Program. Basic scientific research, I think we would all agree, is important to all of us but I do not believe it was the intention of Congress in creating the Section 406 authority.

I believe Congress was clear in its intent that this new authority be targeted for problem-solving in a functionally integrated set of activities. I see a need to carefully consider the opportunities for more directly working with your institutional partners in the identification of stakeholder needs, setting program

priorities, and tracking the benefits that are to be derived from these investments. In my view, a distributed partnership approach would be the most effective way to accomplish that goal.

I base my conclusion on the highly successful regional approach to integrated activities that have been conducted for many years within the Integrated Pest Management and the Sustainable Agriculture (SARE) programs and activities. Both of these regional activities are true federal/state partnerships that operate a competitive grants program.

Programmatic priorities are locally and regionally meaningful. Project activities are responsive to stakeholder needs. These programs are well integrated and, in my view, function across extension and research. These multi-state collaborations are strongly supported, and most importantly, they are highly prized and valued.

Certainly, the existing competitive grants model is not directly applicable to the implementation of Section 406. But there is much that can be learned from this two-decade experience with success. How we might learn from these experiences should be discussed in a

"think tank" activity that should include our regional stakeholders.

We need to extract the best practices of the IMP and SARE activities for adaptation to this new funding authority. I believe we should do this as soon as possible so we can begin to define the broad areas which we are addressing through our requests for proposals and set up procedures needed to attain success.

The funding has been appropriated and now we need to get organized so that we will not lose what I believe could be a full year of critical research, outreach, and instruction within these integrated activities, as outlined by Congress.

Now, how might the program be organized? I am proposing that we are already organized to regionally manage our research, extension, and instructional activities through our regional associations of deans and directors. We have in place formally approved functionally integrated activities that are open to participation by federal and state agencies, private institutions, and international specialists, as well.

Additions to our existing portfolios could

easily accommodate the needs we have for stakeholder input, priority setting, technical assessments, planning for integrated collaborations, and project impact assessments.

Modest staffing requirements could be met through existing funding provisions that permit program dollars to be used to manage the program. In addition to peer review panel costs, funding might be used to support regionally organized stakeholder listening sessions, and formal impact assessments of funded projects.

A lead office could be designated within each region to coordinate regional activities, much as is now done in the Western Region for integrating multi-state research and extension projects.

Several of my colleagues have asked me on numerous occasions about the need to identify and distinguish regional priorities. I think the question is, "Couldn't this simply be done centrally?" I think not, given the following examples.

Our functionally integrated Northeast regional project in food safety has identified four key priority areas in need of integrated research, extension and

instruction. Our technical specialists see the overwhelming need to address the implementation of the HACCP implementation for small enterprises, to name four: fruit juice production, especially with relation to E. coli in apple cider; processed meats; seafood and shellfish; and food handlers. Obviously, these Northeast priorities would not fit the needs of other regions.

Similarly, for water quality issues we believe that we must address the teaching, extension, and research needs of several major watersheds, such as the Chesapeake Bay. The Chesapeake Bay, as you are well aware, is where Pfiesteria continues to be an issue and with much of the concern directed and suggested blame directed at inputs from the regional agricultural sector.

Our water quality problems and issues are much unlike those based in other regions and need to be dealt with on a regional basis. In a different area, our pesticide impact problems also differs here in the Northeast Region, with major concerns coming from home and golf course turf, and household pest control abuses.

I'd like to suggest the following for your consideration as you plan the implementation of Section

406:

I am recommending the organization and management of Section 406 be regions, although some consideration might be given to building a multi-regional program. For example, all of the food safety grants might be supported by one regional office as a set of services for regional competitions. This would seem to be, I believe, the most efficient use of staff support and resources.

Funds should be allocated to the regions by a formula that reflects the purposes of the Section 406 program.

Size of grants, in my view, need to be larger than has been customary in past practices if it is the intention to encourage fully integrated activities, especially if more than on institution is to participate.

Institutional eligibility will be important and I believe that ad hoc extension activities by extracurricular bidders must be guarded against. We do not need to build another extension system but, rather, we need to bring more partners from other sectors into extension. Moreover, pledges to integrate and

collaborate will need some form of assurance that goes beyond simple statements of promise.

I believe that the processes used to call for proposals, evaluate proposals, and monitor awards needs to be re-engineered if the partnership is to gain the efficiencies it really must be re-engineered. Paperless management of grant proposals, virtual panel meetings, and more effective means of accountability must be employed. I suggest looking very seriously at the ADEC, that's the American Distance Education Consortium, electronic model which was developed last year for electronic grant submissions and evaluations. It was designed and implemented and was extremely successful. I think we ought to look at that very carefully.

I strongly suggest that whatever the process that we use a pre-proposal process to screen for the most relevant proposals. I think that you must be aware of the enormous cost to our institutions of faculty time in writing proposals for inadequately funded federal and other -- I won't just simply say "federal" but all competitive grants programs. It costs us literally millions and millions of dollars each year of faculty

time, some estimate as much as 30 percent of our time is spent simply writing proposals. Many of these unfunded proposals are admittedly by the peer panels, are rated extraordinarily high.

I would like to recommend also that you design the Section 406 process to allow partnering with other agencies. I think we all have first hand knowledge of interest by other federal agencies in matching the USDA funding in specific areas. Much of this interest is in gaining access to our extension and outreach networks in areas of mutual interest, and I think I addressed that earlier. I seer opportunities to leverage Section 406 funding several fold but astute strategies are required.

I think I already stated this but I strongly recommend that processes be created for electronic submission of grant proposals.

I also suggest that you give strong consideration to requiring matching in some manner. I'm not suggesting one-on-one matching or one-to-one matching but some degree of financial interest should be committed by the various interest groups if this is done regionally, be they commodity, public or private sector.

I also propose that the process used for announcing the request for proposals, or the RFP , be delegated to the regions, with the use of the Federal Register notification only as required by law. Our scientists don't read the Federal Register. We have a great deal of difficulty getting information from that. I think there are an awful lot of missed opportunities as a result. I think the use of listserves, up-dated home pages, professional society newsletters and there are a vast variety of other opportunities that can also get this information out.

I'd, lastly, like to suggest in this process that the 1890 institutions be fully integrated into the process and that some minimum level be set for their participation. I fundamentally believe that if we exclude the 1890s' institutions from this that we are at great risk, they should never be excluded. While this might not be achievable, an alternative would be to treat the 1890 institutions as we do in other funding as a fifth region.

I believe that regionally organized competitive grants program under Section 406 would yield the

following benefits:

Lower administrative costs, all things considered, including the cost of lost opportunities, but lower administrative costs;

I think it is a vastly improved stakeholder input process into the priority setting process if we do this regionally;

Much greater focus on regional and local needs on topics of importance to the intended user;

I also believe that we can result with a much shortened turn-around time for the grant awards process;

Greatly improved programs success by bringing the grants management process into the information technology age;

Lastly, I think we can accomplish true functional integration, not only do I think we can, I think it has to be accomplished.

Insomuch as this was the point, presumably, or the intent of Congress in creating Section 406 authority, I personally hope that this point will remain central to you, the point that true functional integration will remain central to you in your decisions to proceed with

implementation.

I appreciate this opportunity to share my thoughts with you and I will be pleased to try to respond to any questions that anybody might have. Thank you.

DR. LAUGHLIN: Thanks, Tom. Tom, if you can leave a copy of your --

DR. FRETZ: There are 30 copies in the back.

DR. LAUGHLIN: Okay. Good. Eric, Terri -- do you see where Terri is? So that you'll know who to leave that with. Thank you very much.

Our next speaker, presenter, is Mary-Ellen Devitt, who is the Program Coordinator for SUNEI, which is the National Environmental Initiative.

MS. DEVITT: Hello. How are you today. Thank you for letting me be here and for the opportunity to submit comments on the Agency's Implementation of Section 406 and the new Cooperative State Research, Education, and Extension Service competitive grants program that integrates, as Dr. Fretz was saying, research, education, and service functions.

My name, again, is Mary-Ellen Devitt. I am the Project Coordinator for the SAES/USDA National

Environmental Initiative. That is pronounced "sunny." I am here today on behalf of the SUNEI Steering Committee.

SUNEI is a federal-state outreach partnership that focuses on environmental issues. It was initiated in 1997 by the State Agriculture Experiment Station Directors and USDA-CSREES.

As a primary goal, SUNEI works to broaden this partnership with the Land Grant Universities and CSREES to other federal agencies. It's aim is to reposition the LGUs more centrally on the national environmental research and education agenda and to attract new resources for environmental research and education activities conducted at Land Grand Universities.

To this end, we hope to identify mission-relevant potential partners in other agencies; to foster long-term communication of our interagency partners, including EPA, NASA, NOAA, DOE, USDA, other mission areas besides CSREES; assist federal agencies in gaining access to our Land Grant scientists and the Land Grant system; facility partnerships by our universities with agency decision makers; and distribute information about financial resources among our Land Grant community.

In our purpose to facilitate teaching, research, and extension activities of the Land Grant in areas of environmental science as they relate to agriculture and natural resources. We hope to form new federal-state partnerships.

The SUNEI leadership has picked three areas of national concern that we want to focus our activities on, two which are in our near term and that includes water quality. Our second issue is global change and how agricultural impacts relate to that. Our third issue is invasive species.

In particular to today's comments, the SUNEI Steering Committee recommends that hybrid of the Land Grant Multi-State Research, Integrated Pest Management, Sustainable Agriculture Research and Education (SARE) management strategies could be affective mechanisms to manage the CSREES integrated competitive grants program.

We suggest that committees similar to the Multi-State Research Committees be developed, including Extension, Academic Programs and Research faculty to guide and formulate competitive grants requests for proposals. Formerly known as Regional Research, the

Multi-State Research Programs successfully manage projects across state lines and that is what is intended here we believe.

SUNEI also feels that we can learn a significant amount about grants management from the models of IPM and SARE. Unlike the NRI, both of these programs currently review integrated proposals that take into consideration applied extension and education activities, not just the basic research questions. Therefore, SUNEI suggests that some combination of these three programs will be the most logical strategy.

We feel the direct advantages to CSREES in this regional approach would be in the forms of: staff support for the program that would otherwise be difficult to provide, given the current federal employment caps; direct access to a regionally organized stakeholder listening system; programmatic input from committees of technical experts; greater cost effectiveness for panel meetings; better processes for collecting project impact information; and, more support for the federal-state partnership than through other forms of grants management.

Regionalized competitive grant management would provide the best alternative for managing the Integrated Activities proposed in FY2000 Budget for the following reasons:

We could meet the intended goals of congress when it created the Integrated Account. We could better support the functionally integrated activities, over centralized efforts. We could become more relevant to regional priorities. We could increase long-term funding sustainability. We could better demonstrate applied regional and local impacts. We could encourage states to work together.

In cooperation with CSREES, the SUNEI Steering Committee would like to work with the Agency and our extension partners our Extension National Advisory/Leadership Team to focus on a list of high priority water quality needs, be this through listening sessions or survey. Some of these program areas may include watershed and water quality management, including nutrient management, animal waste management, harmful algal blooms; water scarcity and availability; wetlands groundwater recharge.

In the terms of land-use planning and management including sustainable development to reduce urban/suburban polluted run-off; land conservation and open space for recharge and riparian buffer strips; and coastal zone management.

In terms of environmentally and economically sound agriculture these could include alternative and integrated pest management to reduce pesticide use and improve water quality; sustainable agriculture and turf management to reduce water quality inputs and polluted run-off; precision ag, forestry, and range resources to reduce inputs and run-off.

In terms of environmental modeling, monitoring, and forecasting, these could include monitoring floods so that we know when soils are saturated so we can reduce run-off; weather and climate forecasting to reduce the risks of polluted run-off; and nutrient management models to meet clean water action plan requirements.

Our additional recommendations include the following:

SUNEI would suggest that however CSREES chooses to implement Section 406 that the integrated competitive

grants that regional management of peer review panels, chairpersons, and committees be adequately funded.

SUNEI would like to work with CSREES to leverage water quality program dollars with other agency funding, especially EPA, to increase the total amount of the competitive grants program in water quality. We feel that this leveraging with other agency funds will directly serve Land Grant System needs.

If we can leverage USDA funds to increase the pool of funding we will be able to fund larger projects, more of them, and better meet regional agricultural and natural resources stakeholder needs in water quality.

Similar to the IPM and SARE models, SUNEI recommends that opportunity announcements for these funds be communicated not only through the Federal Register, as Dr. Fretz said, but also through a variety of Web-based tools.

SUNEI also recommends that CSREES apply the new Web-based paperless management technologies that are being developed to manage these competitive grants.

SUNEI would also, finally, suggestion that CSREES call for pre-proposals, as Dr. Fretz suggested, to

encourage proposals that most appropriately fit the RFPs and applied regional needs, in turn saving time and energy for our faculty members.

I thank you very much for the opportunity to submit comments. If you need to ask questions on, please feel free to call the SUNEI office. There are copies of the testimony in back. Thank you.

DR. LAUGHLIN: Thank you very much. Our next presenter is David Salmonsen. David is from the American Farm Bureau.

MR. SALMONSEN: Good morning everyone. My comments today are going to focus on the water quality and pest management parts of the Integrated Research, Education, and Extension Competitive Grants Program.

Farmers and ranchers share the public's concern about the quality of our water resources and are working to improve water quality. More than two-thirds of our nation's waters now meet their designated uses. We believe that private efforts, improved technology, and incentive-based programs, such as the Environmental Quality Incentive Program, the Wetlands Reserve Program, and the Conservation Reserve Program have contributed and

will, if properly funded, continue to contribute to improved water quality.

There are now several regulatory proposals from EPA related to non-point source pollution. We believe that the states must be allowed the flexibility to address non-point sources with reasonable voluntary approaches, based on incentives, education, and technical assistance. Using locally designed, economically feasible best management practices they will help farmers and ranchers maintain their businesses and improve water quality.

State and local programs should provide for a mix of research, development, education, and technical and financial assistance for both planning and implementing actions aimed at achieving water quality standards and designated uses. Grants should be made available for these purposes.

Water quality monitoring is crucial to understanding the extent and nature of impairments, as well as gauging the effectiveness, utility, and economic feasibility of conservation measures and best management practices. The use of monitored, instead of evaluated,

data is necessary so that policy and regulatory decisions are based upon an accurate understanding of water quality conditions and impairment sources. Grants should be made available for state and local watershed water quality monitoring programs.

The effective approach to solving our nation's water quality problems is through local incentive-based partnership efforts with the government and other local stakeholders. State and local watershed efforts are effective and must continue to be supported through financial and technical assistance. Land Grant colleges and universities must be partners with farmers and ranchers to effectively address water quality.

Several years ago I was with the New York Department of Agriculture and we engaged in a program in the New York City Watershed, large watershed area north of New York City which provides drinking water for 10 million people and primarily land use composed of dairy farms.

According to the Safe Drinking Water Act amendments the New York City had imposed severe restrictions on manure spreading in the watershed, a lot

of setbacks from streams, which was really going to impact the farmers' ability to run their farms in that area.

We along, especially with Extension Cornell University and several other people, got together and worked on a two year process to try and bring about a program which would allow the farmers to remain in business and a law to protect the drinking water quality in the New York City reservoir system. It did work and has worked.

The point I want to make in regards to the water quality in this program from that effort was that it was the extension program with local people, with the access to university research when that was needed, and primarily with the trust and the willingness for a long-term commitment that made that program work. It was the one local entity that had a lot of other people that it could bring in that the farmers would trust, for in the beginning there was no trust between the farmers and the New York City regulators who had had a long history in that area and a not very good one with the local people.

So, I just want to make the point that in trying

to fund these programs, working with extension, getting close to the farmers as partners, and also working with the other entities, whether it be regulators with the local government, other watershed people that there must be a longer term commitment, must be adequately funded and supported through the university. The extension program there was very effective and it has been effective in other watershed efforts across the country.

The second part of my comments today would focus on pest management, specifically Pesticide Impact Assessment, the Food Quality Protection Act, and Methyl Bromide.

We are in the third year of implementation of the Food Quality Protection Act. However, the way the act is being implemented is causing great concern for growers across the country. We are now being told that farmers must mitigate risk for many critical pesticide tools, some of which have been used safely for over 40 years. This has meant the outright cancellation of some uses and dramatically altered use patterns of others. There is substantial concern among producers as to whether they will have access to effective and affordable

crop protection tools.

With these mounting concerns, growers view the Agriculture Department's involvement in this issue as critical. Yet, despite the growing need for USDA involvement, the department's budget requests for assisting the FQPA implementation were not fully funded. The availability of newly released funds now offers the USDA a way of supplementing needs in program areas involved with pest management and the FQPA. We urge that a portion of these funds be allocated for FQPA implementation. Let me be more specific.

It is essential that USDA, the Land Grant Colleges and Universities and growers work together to solve the serious challenges and threat to agricultural producers by the implementation of this act. The prospect is very real that producers of some commodities will have no tools to adequately or affordably protect their crops and still remain competitive domestically and internationally.

It is critical that a greater level of outreach be undertaken at the state level to involve growers in the collection of data and also in the search for

alternative and biological tools to replace those that may be lost.

The fiscal year 2000 Agriculture Appropriations bill provided the allocations that are much less than the Administration's original budget request. We urge you to consider increasing the funding amounts for these critical programs to the level that was initially requested by the Administration. We also urge that the Pest Management Alternatives Program be supplemented by additional funds.

Additionally, various crop survey programs, including residue and market basket surveys and pesticide use data, were funded. The use of more real-world data in assessing pesticide risk under the FQPA, rather than the use of default assumptions, is essential for sound implementation.

Grants from this initiative should also be used to fully fund the Office of Pest Management Policy at USDA so that the department can maintain its critical involvement in the implementation of the Food Quality Protection Act. Farm Bureau strongly advocated for the creation of USDA's Office of Pest Management Policy and

we believe it is essential that USDA play a leading role in efforts to ensure the availability of effective and affordable crop protection tools for growers, especially those who produce fruits, vegetables and other specialty crops.

We also encourage the use of grants for the purpose of collecting residue data at harvest which would demonstrate actual, rather than theoretical use. This type of information could serve to protect the continued use of many safe pesticides that have not alternatives. This type of data could be especially beneficial for minor uses of pesticides.

Additionally, we encourage you to consider requests to directly fund and facilitate "self-help" grower initiatives which would allow resources for grower groups who are interested in reaching alternatives for uses, in anticipation of the loss of organophosphate.

There is considerable knowledge and expertise among private sector firms that provide a variety of pest management and environmental services to farmers on a regular basis. We believe that some of these resources should be available for use by farm and commodity

organizations for such private sector initiatives.

Thank you for the consideration of our comments.

DR. LAUGHLIN: Thank you very much. Does anybody else who is here today have any comments that they would like to make on water quality? The mike and the podium are open.

(No response)

Seeing none, part of me says just go on but part of me also says you have to be fair to those folks who read the notice and were given specific times to be here. So, in fairness to those who aren't here I'd like to say let's take -- if you could be back here at 10:45 a.m. we will begin with the food safety.

(Whereupon, a brief recess was taken from 9:49 a.m. to 10:43 a.m.)

DR. LAUGHLIN: Well, if we could get started. What we'll plan to do is we will do the food science section now, we'll break for lunch, we'll come back and then we'll do the pest management and the other issues but we won't take the break, we'll put them together and then at the end we will open it up for anyone else who would have something that they'd like to say. I think

that many of the folks who were not here early this morning have arrived and so they'll have the opportunity to hear the conversation that goes on.

So, if we could go ahead. We'll start with food safety. Dr. Merle Pierson from Virginia Tech will actually be addressing two issues. Merle.

DR. PIERSON: Thank you. Good morning. My name is Merle Pierson. I am a Professor of Food Science at Virginia Tech. I will be giving comments on behalf of two different organizations so that I'll go ahead and separate those accordingly.

First of all, I'd like to speak on behalf of the Institute of Food Technologists, or IFT as it is known. IFT is a 30,000 member professional organization. Its membership consists of representatives from universities, industries, and government throughout the world, very large professional organization.

IFT commends USDA CSREES for its role in administering research and extension grant programs directed toward the safety of our food supply.

IFT appreciates the opportunity to make recommendations for the new Integrated Food Safety

Competitive Grants Program. This program, yes, is new, it will be unique. However, the program is an outgrowth of really two existing programs. One is the Special Research Grant Program that started the fiscal year before last at $2 million, this past fiscal year was at $5 million. The Food Safety and Quality Program last year was $7.365 million -- is that right, Jan? That particular program was under the management of Jan Singleton.

These two programs, in effect, are being combined. The programs identified and addressed issues of national priority and importance, issues relative to the President's Safety Food Initiative. These issues that were identified were also based upon stakeholder input. For example, there was last year a national conference that was sponsored by USDA/CSREES that had stakeholder input from throughout the United States, consisted of a series of presentations on areas, as well as an opportunity for public input.

I thought it was important in this to give that background and to know where this program is coming from. Now it is in one $15 million package. The ante has been

upped by about $2 million for this year in this new program.

It is important that the new program be complimentary to and address food safety issues that are not already embraced by the National Research Initiative Food Safety Grants Program. It is important, again, that there be a complimentary nature to this.

The NRI program is focused more on basic long term research needs. The integrated program should address applied issues and areas that are of continuing concerns, as well as issues that are of emerging concerns relative to public health.

The program should consider food safety issues related to the entire food system and not just emphasis on one segment. It needs to address the interrelationships of this system.

The RFP, whatever form it occurs, should address national priorities for food safety and the concerns of producers, processors, distributors, retail consumers, and government agencies.

It is recommended that the program not be overly prescriptive relative to specific research extension

projects that need to be generated, rather major concern areas need to be identified.

It is recommended that there be three components to this program. One, with a research emphasis; two, an area with an extension emphasis; and, three, an integrated extension research area.

The allocation of funds to these areas for the research should be similar to last year, to the extension similar to last year and the new funds could possibly go into this for integrated research extension activity. For example, for the research area last year it was recommended that the proposals address risk assessment issues. For this year you might consider something similar in the area of risk assessment of extreme importance. Specifically needs, for example, of testing models for risk assessment and information and support of risk assessment.

Another area of research that is very important is understanding the sources and incidence of food borne pathogens and new and unique ways to control those pathogens in the food system.

Another area that could relate is a continuing

area from last year, something that is of continuing concern and that is the scientific basis for components of HACCP, the critical limits, critical control points. These types of things are in support of, obviously, industry concerns, consumers' concerns, and government agency concerns.

Areas of microbial resistance should be addressed, such things as antibiotic resistance and acid resistance, et cetera, and, again, considering the food spectrum, whole food spectrum.

The area covered for the past two years in the research component addressed fresh fruit and vegetable safety, that is a continuing concern. I believe there is some good research that's ongoing and we would encourage the support of more research in that area.

For the extension area, I won't say quite as much about that, however, it should be broad based relative to food safety issues and the entire food spectrum. One specific area that is quite important would be the plan of work projects, those provided states with very specific seed funds that can cross a number of boundaries relative to food safety and address a number

of specific issues within states. We should hope that there are similar types of funds that are available to the states to support plan work type of activities.

For this integrated extension research area it is recognized that quite often one specific research project does not generate an extension activity. Normally an extension activity comes about through a synthesis of various types of research activities. So, an integration of a broader scope of research.

What should be looked for in this area is a synthesis of a diversity of research, again, a multi-disciplinary type of approach, a multi-state approach to bring these types of projects together into some major food safety issue that's addressed.

In short, these are the comments that IFP is making on this particular grant program. We thank you for the opportunity to make these suggestions and wish you the best on getting everything on stream and timely funded. Thank you for that part of my presentation.

Now, if I could put on another hat. For the record, I would like to thank you again for the opportunity to provide comments relative to the new

Integrated CSREES Extension Research Program and Food Safety. My name is Merle Pierson, if you didn't catch it the first time around. I am speaking this time on behalf of the participants of the Integrated Extension Education Group, IEG4, specifically, and S263, the Southern Regional Research Project on enhancing food safety through control of food borne disease agents.

IEG4/S263, although it was created as a Southern Region project it has grown more national in scope in that it includes participating states of Alabama, Arkansas, North Carolina, South Carolina, Virginia, New York, Minnesota, Michigan, Nebraska, Mississippi, and Iowa. So, again, it has gone beyond this artificial boundary.

IEG4/S263 has been an integrated research extension project now for 5 years. The project was started by the Southern Region Extension Information Exchange Group. IEG4/S263 would like to make the following recommendations concerning the Integrated Research Extension Program.

One, plan of work funds should continue in some form. States have used this money very effectively in

initiating innovative food safety programs. Plan of work funds support a wide range of activities addressing food safety issues of specific concerns within states.

Two, it is recommended that the program, although integrated, consist of three distinct components. One being research, two is extension, and three is a combined extension research area. The level of funding for research in extension could be similar to what it was the past fiscal year and the additional funds used to support the new research extension component. For this latter area it is recommended that there be a pool of money to support not only larger interdisciplinary projects and multi-state projects but also for smaller demonstration type projects of national importance and need.

Three, universities have been conducting integrated research extension food safety projects for many years in fact. This has often occurred with extension inputting research ideas, as well as extension transferring technology of basic research projects. The new area of integrated extension research with a focus on interpretation of research in extension, therefore, would

be desirable and provide needed funds for this integration that we have seen in the past.

Four, in the past extension related projects have been limited to one year. It is recommended that projects be allowed for at least two years or more to provide more continuity to the programs. Furthermore, it is recommended that multi-state projects in the area of extension be encouraged in order to provide a broader scope of focus and collaboration.

With that, IEG4/S263 looks forward to seeing these new funds, welcomes them very much, and thanks you for the opportunity for comments regarding the new program. Thank you.

DR. LAUGHLIN: Thank you, Merle. The next presentation is Jeff Richards, representing SUNEI.

MR. RICHARDS: SAFER.

DR. LAUGHLIN: SAFER. Okay, sorry. Glad to have you here.

MR. RICHARDS: Good morning. My name is Jeff Richards. I am the Project Coordinator of the Northeast Food Safety Initiative, better to be known as SAFER, Safe Agriculture through Food and Education and Research

Initiative. I am here today on behalf of this consortium of Land-Grant universities to talk about food safety.

Thank you for providing the opportunity today to comment on the implementation of the new Section 406 Integrated Research, Extension and Education Competitive Grants Program. We are pleased to see that there is a continued interest in promoting integrated activities to address the critical issues in agriculture. This integration provides a unique network for research, extension, and education to resolve the agricultural issues in our communities.

The threats posed by the spread of new and emerging food-borne pathogens and disease are increasing as a result of increasing international trade and lack of sanitary conditions and regulations. It is also increasing partially due to an increasing proportion of susceptible subpopulations.

New pathogens and infectious organisms appear to be becoming more virulent as a result of the development of new antibiotic resistant strains and the emergence of foreign diseases or those which have not previously associated with human or animal disease. Both new and

emerging organisms are often undetectable and/or untreatable by traditional techniques.

Better methods of analyzing, identifying, and managing new and emerging hazards is critically needed so that research results, new technologies, and training can be employed from the farm-to-table. In result, our agricultural food products can be processed under economically efficient methods and safer conditions to eliminate the potential for food-borne toxins, pathogens, or diseases to develop.

In recent years the Land-Grant Universities of the Northeast have moved to a more functionally integrated approach to multi-institutional collaborations. The region has been concerned with many of the food safety issues associated with seafood, meat and poultry, fresh fruit and vegetable food-borne illnesses. The North East Land-Grants have joined efforts to utilize the strengths of the various institutions and partners to provide a food production, processing, marketing, and consumption system that is free from food-borne toxins and microbes. The SAFER Initiative is a regionally developed effort to be

implemented at the local, state, and national level and is directed towards increased food safety teaching, extension and research.

As the Federal Government moves forward in the process of converting the nation's food safety assurance system from one of inspection to one of risk-management under the HACCP system, the identification of the key food processing risks are being identified and plans are being implemented for dealing with those risks.

This delegation of food safety responsibility to food processors and handlers will require adequate research and education efforts for success.

Safe food depends upon broad-based understanding of the causes of food-borne illness, paths to prevention, and commitment to preventative practices employed by producers, processors, handlers, and consumers. Much like the successes of the regional IPM and SARE programs, producers are joining in efforts with Cooperative Extension educators to apply management programs and new technologies that best resolve the local and regional agricultural needs. A majority of the food safety issues, both nationally and internationally, are

parallel in nature. However, there are elements of food safety which highly pertain to the localized influences on the development of these food-borne hazards. There are geographical differences alone that play into the variables affecting the food agriculture within that area. For example, seafood and shellfish food safety concerns lies heavily in the Northeast Region of the United States.

Many of the concerns would pertain exclusively to the environmental influences on the water bodies that host these organisms. Other commodities share similar regional concerns in the nature of their ability to become contaminated. However, they are usually brought about under different regionally distinct environmental conditions. Specifically food-borne organisms are highly dependent on the local environmental conditions that allow them to flourish.

In discussing the options for CSREES implementation of the new Section 406 account a variety of mechanisms have surfaced.

Our preferred model would be to organize the food safety competitive funds into a program similar to

the manner of the regional IPM model. The IPM funding is annually apportioned to regions that set priorities for research and extension, and assist in the development of the request for RFPs.

A grant manager impanels a team of peer reviewers from other regions to evaluate the proposals received. Recommendations are then made to CSREES for funding based on scientific quality, merit and relevance to regional needs. Institutional participation is not exclusive to that region, in that principal investigators outside the region may join in with one or more PIs from within the region to form a proposal. Thus, the regional organization of the IPM program is more in terms of priorities, rather than the institutions alone. Both extension and research projects are funded through this model. Similarly, the regional SARE model is uniquely close to the IPM program.

One of the great advantages of having regional facilitation of food safety grants would be that the organizational structure and mission to partner with other federal agencies and have an established set of relationships with different agency players in this

topical area. SAFER would aim to leverage food safety program dollars with other agency funding to increase the net total funding of this grants program.

We feel this leveraging with other agency funding would directly serve the Land-Grant System needs and meet the intent of Congress and other agency agendas via partnership opportunities and the development through efficient use of resources.

This proposal offers several advantages to USDA when compared to the NRI model alternative. These advantages include cost efficiencies relative to centralized management; stronger support for partnership opportunities; more responsiveness to regional priorities; and, proven methods for managing functionally integrated activities. The advantages for the state partners will be in opportunities to partner with other federal agencies who share in our common agendas; designation of grants larger than traditionally awarded to support multi-state and integrated activities; and more direct participation in the planning and reporting of these activities.

Under conditions of a regional competitive

grants program much of the existing personnel and committee resources within the university teaching, research, and extension system can be utilized. Regional technical committees could be formed to assess regional priorities and collect input from stakeholders. The regional committees could develop and draft the RFP to respond to the region's specific issues. The regions could utilize the extra-regional specialists to review their region's grant proposals as to limit conflict of interests.

The regional committees could have a chair to coordinate interregional activities for the food-safety competitive grants. Recommendations from the peer review panels would be submitted to the partnership agency(s) for final approval and direct awards by the agency.

We believe that the functionally integrated regional IPM and SARE programs offer the best models for implementation of the integrated activities account. Our preference is for emulating both the strong stakeholder involvement of the SARE program and the managerial efficiency of the regional IPM programs.

A significant amount can be learned about the

grant management from the regional IPM programs. These programs review integrated proposals and have had success in administering a competitive awards program that takes into consideration the integrated research and extension education activities. Therefore, some combination of these programs seems to be the most logical strategy for implementation of this new program.

Thank you for the opportunity to comment on Section 406.

DR. LAUGHLIN: Thank you very much, Jeff. The next person is June Henton.

MS. STOWE: I'll be speaking for her.

DR. LAUGHLIN: Barbara. Barbara Stowe will be presenting.

MS. STOWE: Thank you very much for this opportunity. June Henton is the Dean of the College of Human Sciences at Auburn University and she also is on the Executive Committee of the Association of Administrators of Human Sciences and is the representative from that group to the NASULGC Board on Agriculture Budget Development Committee.

So, we too appreciate this opportunity to

comment on this Integrated Research, Education, Extension Competitive Grants Program which is made available by Section 406 of AREERA.

On behalf of the Association of Administrators of Human Sciences we want to specifically address the food safety component of this competitive grants program but also the delegation of authority for its management.

Human sciences units within the Land-Grant University System offer research, academic programs undergraduate through doctoral degree and extension outreach education programs from an integrated or systems perspective understanding that the most effective solutions to human needs require linkage between discovery and dissemination of information. So, this Integrated Grants Competitive Grants Program really offers a very important opportunity, we think, to find solutions to some targeted issues that are important to people and also to the agricultural enterprise more generally.

Now, on the matter of food safety. Certainly food-borne illness remains prevalent throughout the United States and that is in significant part because

food handlers, preparers, consumers are really not fully informed of the risks or committed to safe food handling practices.

The public has become increasingly sensitive to food safety issues with highly publicized reports of food-borne illnesses. But, in too many cases segments of the public are not aware of ways in which illness can be prevented.

Today approximately half of food expenditures are for meals away from home. Vulnerable populations, such as children and the elderly, have increasing responsibility for acquiring and actually preparing some of their own food or they are served meals in congregate feeding sites, such as daycare centers, homes for the elderly, and a number of others any of us could add to the list.

Further, ready to eat food is so widely available at a range of retail establishments. The increasing diversity of the American population is also a matter of increasing diversity in the way food is eaten and the way food is handled.

It is no longer reasonable then to base food

handling guidelines or management practices or policy or education on a monolithic view of the food handler or of the consumer.

Now, we have numerous reports which describe what consumers in general can do to improve food safety in their own households. Yet, little information exists identifying the method and frequency at which specific food handling practices are performed in a less than safe manner.

While a great deal of research and indeed more is needed, is available on handling practices, and production, manufacturing, processing, and distribution of food stuffs information regarding the range of consumer and food handling practices has really been almost non-existent. So, to prevent further spread of food-borne illness there really is a need to target and change unsafe food handling practices all along the food chain.

A specific goal of a research phase would be to document food handling practices of retailers, food service workers, and various segments of the consuming public as a scientific basis for regulatory policy and

effective education programming. A specific goal for an education phase would be to develop audience specific research based education programs, teach and evaluate them to effect positive behavioral change.

If such objectives were met successes could be in the following areas:

Significantly reduce food-borne illness, especially among our vulnerable populations.

We should be able to significantly improve the quality and effectiveness of food safety education. In other words, make it more specific, targeted, understand how the user of the information is receiving the message.

Better target food safety education food safety programs for effectiveness among these specific populations and an efficiency in which we administer food safety education

Provide small business food processing and handling operations better access to scientific based food safety procedures. And provide a scientific base for food safety policy development and there could be others.

Now a word or two about management of the

program. Success of a program, such as that outlined above, requires the integrated approach to problem solving, which is provided for in Section 406 authority.

Affecting human behavioral change toward activities, such as safe food handling, requires documentation of actual practice within specific population context and cultures. Message of rules testing, based on that documentation and that is followed then by a series of refinements of documentation and message testing until the changes in behavior can either be adopted or hopefully be sustained. This kind of research and education requires continuous interaction between the researcher and the educator.

Early identification of populations in need, might be small business operations, child care centers, homes for the elderly, are readily identified by our extension educators currently and they are very skillful in tailoring education to the targeted audiences. I think the EFNEP program is a prime example in which they do a great deal of message testing, knowing how many times one needs to go back to a certain population, with

what frequency, what kind of message delivery is most effective. So this would be an enabling way in which they could use much of what they are already extremely good at doing.

Integrated problem solving and behavioral research methodology do differs from the type of basic research approaches generally currently managed in the NRI program. Further, current definitions of scientific merit that are used by that program, may not be appropriate for this kind of integrated problem solving and would indeed have to be addressed effectively.

So, we would like to recommend that this competitive grants program, integrated program under 406, be managed centrally under CSREES authority and the reason that we -- the issues are universal, we think, and therefore, there is, as has already been mentioned, interaction nationally and sometimes internationally among our workers in the Land-Grant University System research and/or extension but a central authority would be available then to help oversee national/international activity.

We also think that the program might be well

directed by a manager with administrative experience in research, education, and extension integrated problem solving in the subject matter areas that are identified specifically for this program. That might even be an administrator drawn from the Land-Grant University System. We know that the competitive grants program in USDA is often looking for additional assistance and indeed does draw upon the Land-Grant and others, so this might be an opportunity for involvement of someone with this kind of experience.

We also would recommend that panel reviewers be representative of the integrated nature of this program and that the manager have sufficient staff and resources to get grants awarded from an accelerated time frame.

Thank you for the opportunity to comment.

DR. LAUGHLIN: Thank you very much, Barbara. Our next presenter is Dean Sutphin from Cornell University. Dean.

MR. SUTPHIN: Thank you. My name is Dean Sutphin. I should point out that is a first name, not just a title. I am the Associate Dean and Director of Academic Programs at Cornell University and Chair Elect

of the Academic Program Section of the NASULGC Board on Agriculture.

I am here today on behalf of the Academic Program Section to express support for higher education in the definition description and implementation of the new integrated account under Section 406 of the Agricultural Appropriations of Fiscal Year 2000.

While the testimony for this session focuses on food safety my comments apply across all areas.

We believe that change brings opportunity and that the new integrated account provides an excellent opportunity and mechanism to generate programs that create a strong future for American agriculture.

Nothing in the future of agriculture will have a greater impact than our ability to produce leaders that generate new ideas, new products, and new methodologies for agriculture and the food system. A well educated agricultural scientific workforce capable of adapting to economic and social change, adopting current and future technologies, and using pioneering information will be the main stay of a strong agriculture in the 21st Century.

In order to ensure that our institutions and faculty have the capability to produce and develop human capital that is needed to maintain a strong agriculture they must be able to offer programs that are innovative and exciting that integrate all parts of the food and fiber industry in their curricula and that are attractive and accessible to all parts of society.

Past agriculture has always depended on a highly educated workforce. Future agriculture will depend even more on an educated workforce that can take information and technology and turn them into agricultural value.

We believe that this program has the ability to strongly contribute to that educated future workforce in agriculture. The Academic Program Section is pleased that higher education is included in the discussions and concepts that have been developed for this program to date.

We encourage you to continue to include higher education and the development of human capital as integral components of this new program and to ensure that the criteria for evaluation of proposals for this program will ensure that education proposals can compete

on an equal footing with other areas.

There are opportunities for individual, regional projects, or through a consortia, cross-regions that address critical needs and leverage state and institution funds. This competitive grants program opens new possibilities to prepare the next century workforce that would not be possible with existing funding mechanisms. This new competitive grants program provides greater access to needed funds and partnerships.

We commend the Agency on this new way of addressing needs. The Academic Program recognizes your past support and appreciates your continuing support of higher education and students in agriculture. Thank you.

DR. LAUGHLIN: Others who would like to make comments in the area of food science or food safety?

MS. DUNHAM: Good morning and thank you for letting me address this group right now.

My name is Bernadette Dunham and I'm representing the American Veterinary Medical Association. I am delighted to join you on this new Integrated Research, Education, and Expansion Competitive Grants Program that has been announced.

The one thing I wanted to agree upon, as you've heard so far, is the definite need for diversity and collaboration amongst the various universities involved as we look at a very important phase of food-borne illness. From the veterinary point of you, you are right, antimicrobial drug resistance is very very important. We need so much more basic research to understand this problem. We certainly need the development of rapid diagnostics that can be utilized all the way from farm through to the final person using this, the consumer, us.

On that note, I would encourage very much where we can looking at and reviewing applications that would focus on those two areas. At the same time, we have with the Special Grants Program an ongoing project that can continue to grow and also reach out and be further involved in collaboration and that is the Food Animal Residue Avoidance Databank, which the USDA has started and has grown and there is a marvelous program. And where there can be continued collaboration with this I would encourage it, especially after we've seen what's happened in Europe with Dioxin scare. We still need to

be able to communicate and have research basis here for understanding residue avoidance, being able to utilize drugs safely in our animals so we can have healthy animals to give us a healthy food supply so, that is one area that can continue to grow and this program may be able to assist on that.

Finally, as I say, regarding the chance to be more competitive with regards to agriculture, the whole scenario of understanding what's happening globally so we do have transparency as an issue of big concern. So with universities being able to understand what we need to be competitive we do need to open up areas of research so we can understand what's happening in other countries and so they can understand what we're doing. So, we really do have the transparency required and there is a lot of research that can be conducive to do that.

Very broad statements for right but thank you so much for allowing me to have a few comments to give to you. Thank you.

DR. LAUGHLIN: Thank you very much. Other comments as relates to food safety?

(No response.)

Seeing none, I would suggest that we will break for lunch, we will come back. As we said, we will start at 1:00 p.m. and we will compress the afternoon. As soon as the pest management comments are done we will go into the other issues and move forward. At the end we will then have an opportunity if anyone wants to come in to make additional comments.

(Whereupon, at 11:23 a.m., the hearing was recessed, to reconvene at 1:00 p.m. this same day, Thursday, December 2, 1999.)

A F T E R N O O N S E S S I O N

(12:58 p.m.)

DR. LAUGHLIN: Okay, I think the hour has arrived and we can go ahead and get started. I noticed that we have some folks that weren't here this morning. I'd like to say that if you have comments that are written -- I don't see Terri right at the moment but if we can leave those with Sally Rocky at the end. Also, we plan to have the comments on the Web by December 10 for everyone to have access to and written comments will be accepted through December 17.

So, what we'd like to do is start this afternoon's session in the area of pest management. Our first person will be Rick Melnicoe from the University of California. Rick, we're happy to have you here with us today.

MR. MELNICOE: Thank you for the opportunity to comment on Section 406 as it relates to the Pesticide Impact Assessment Program.

My name is Rick Melnicoe. I'm the Western Region Coordinator and the State Liaison Representative for the California Pesticide Impact Assessment Program.

I will make a few comments on Section 406, mainly as it relates to state Pesticide Impact Assessment Programs. Others that will follow me will talk a little more on the regional issue, as well as the state issue.

The Pesticide Impact Assessment Program has been very successful in providing data on pesticide use and usage to USDA and EPA in order to address FQPA issues. This has been accomplished through very well organized state, regional, and national programs. Each state has a State liaison Representative responsible for PIAP and this has been the strength of PIAP. I think those of you who have worked with it understand that.

The state programs have historically been funded by USDA dollars allocated by an algorithm based on a number of agricultural and pesticide factors. This funding has been relatively secure and allowed for state programs to develop with a sense of continuity. Funds have been allocated to land-grant institutions around the first of each calendar year.

Under Section 406 all funds will be competitive. Significant funding delays to successful states will occur in FY2000. These delays will be well into the

summer if the RFP is not quickly developed and noticed in the Federal Register. This will, and has, resulted in a loss of PIAP staff. This will affect the ability of certain states to respond to FQPA information issues. The continuity of the program will be jeopardized if funding cannot be expedited.

PIAP has met the challenges that FQPA has presented for information needs and provided quick responses to emerging critical issues. I strong recommend that the FRP be written in a manner that does not fragment the responsibilities of PIAP. In order to fully respond to
FQPA issues a single point of contact is needed for PIAP in each state.

The RFP should require the principal investigator to coordinate all FQPA activities within their state, as much as the program would allow, and not allow for multiple requesters within their state to divide funds so that no single person can coordinate the program within the state.

What I mean there is that you really need a single focal point within the state on these issues. In

order to respond to questions that may come from the Office of (?) Management Policy it works very well to have a person they can go to within the state that can gather the information and quickly provide information back.

Without this requirement responses to information requests will be hampered. Further, I suggest that the Crops at Risk and Risk Avoidance Mitigation Program be coordinated by this same PI.

Multi-year proposals should be encouraged. This will help to stabilize the FQPA activities in the states. It will allow for program continuity with SLRs, program staff, and student assistants. Multi-state or regional proposals and collaboration with stakeholders should be also encouraged.

The outreach component to PIAP cannot be overlooked. In addition to providing information to USDA, SLRs are a vital link to state constituents. They provide a direct link from USDA to growers, commodity groups, university researchers, and others. This component must not be lost, as the PIAP SLRs historically have been the means to get information to and from USDA.

In conclusion, the implementation of Section 406 may eliminate state and regional leadership and curtail responsiveness to FQPA, minor crop, and other pest management issues. This includes the development of crop profiles, transition strategies, and the review of EPA risk assessments and other documents. The ability of the National Program leader and the Office of Pest Management Policy to respond to FQPA and other issues would be hampered. The continuity of this national pest management gathering network will be severely compromised by the uncertainty of a yearly competitive funding process unless a mechanism is in place to allow for multi-year funding.

Thank you.

DR. LAUGHLIN: Thank you very much, Rick. Norm Neshiem from the University of Florida.

MR. NESHIEM: Thank you also for the opportunity to comment on Section 406 of AREERA as it pertains to the Pesticide Impact Assessment Program.

My name is Norman Neshiem. I am the Florida State Liaison Representative and the Southern Region Coordinator for the Pesticide Impact Assessment Program.

My comments will relate to the Pesticide Impact Assessment Program, impacts of Section 406, and some recommendations as it relates to both state and regional programs.

The primary objective of the Pesticide Impact Assessment Program has been to provide the most objective and accurate data available for defining and evaluating benefits and risks of selected pesticides with critical agricultural uses. Inherent in this objective has been the provision for a single uniform approach to obtain data from the agricultural system. And by here the meaning of agricultural system refers to USDA agencies and the agricultural experiment stations and the state cooperative extension services.

Although this objective for the Pesticide Impact Assessment Program was written 23 years ago when the program was established, it is interesting to note that the issues that led to its development then are very similar to the ones we are dealing with today in the implementation of the Food Quality Protection Act and the reregistration process for pesticides.

There is still a need for objective and accurate information on pesticide use and pest management practices to be able to define, evaluate, and mitigate dietary, occupational, and environmental risks to selected pesticides.

More recently the Pesticide Impact Assessment Program has been a link to the states for the USDA's Office of Pest Management Policy, related to FQPA and pesticide issues.

One of the principle reasons for establishing the Pesticide Impact Assessment Program was to create a coordinated approach to obtain information from the agricultural system. Until PIAP was created efforts to obtain information were uncoordinated and ineffective. One of the strong points of PIAP was the establishment of the single contact point, the SLR, in each state. In view of that, I strongly recommend that the RFP for the Competitive Grants Program under Section 406 be developed in such a way to prevent fragmentation of the program, to be able to retain some type of a single contact point in states.

We don't want to fragment the program so that it

is difficult to coordinate such activities in the state and that responsiveness to questions and issues that are raised are difficult to coordinate and respond to from a particular state perspective.

PIAP has played an important role in dealing with pesticide issues related to EPA risk assessments for pesticide use in crops or other sites in the states. These issues frequently occur without predictability and the EPA/USDA staff making requests for state specific information often ask for a quick response. Program stability has played an important role for states to effectively respond to such requests.

The previous mechanism of allocating funding to states based on an algorithm permitted the development of stable state programs and the ability to attract and retain program staff that was needed to develop information resources to respond to such requests.

In the development of an RFP strong consideration should be given to multi-year funding of proposals to encourage stable PIAP programs in the successful states and to attract -- so if they are able to attract and retain staff.

State outreach components, of course, need to be considered strongly in developing the RFP. In addition to providing the information to USDA or EPA, as the requests may be, the program has been important in communicating to constituents in the state. Growers, commodity groups, applicators on pesticide registration issues, pesticide regulation issues, are important to have that interaction with the user community in the state so that these linkages need to be maintained so that critical pesticide information, pesticide use, and pest management practices can be obtained. So, a state outreach component needs to be included in the RFP.

As we have said, the PIAP program has been in existence for nearly 23 years. Many states have experienced staff whose salaries come from PIAP funds. We have already heard that these funds have come, traditionally, at approximately the first of the year. In January 1999 was when last year's funds came.

Due to the new mechanism of funding PIAP, states who successfully compete for these funds will probably not receive them until August of September. This puts some real strain on maintaining existing linkages and

staff in states. So, a developed RFP, I'd urge to get that out quickly so that appropriate responses from people competing for these funds can be made.

An RFP was used in the call, previously in the call for state allocation proposals under the previous funding mechanism to distribute PIAP funds. In developing an RFP for the competitive grants process I would encourage that strong consideration be given to use of the areas of emphasis that were in that state allocation proposal to be put into the new allocation proposal.

This concludes my comments for the PIAP program. Thanks for the opportunity.

DR. LAUGHLIN: Thank you very much. Leonard Gianessi, from the National Center for Food and Agricultural Policy. Thank you for coming.

MR. GIANESSI: My name is Leonard Gianessi. I am Senior Research Associate at the National Center for Food and Ag Policy. We are a private non-profit group here in Washington, D.C.

For the past 10 years or so I've been working on maintaining a national pesticide use database for the

country. Our database is the only comprehensive database of pesticide use for all states, crops, and active ingredients.

A major source of data on pesticide use that we put into our database have been pesticide use surveys and reports that have been supported with PIAP projects. Basically since 1990 there have literally been hundreds of reports on pesticide use that have been supported and developed because of PIAP support. Most of these reports on pesticide use have come from the states with PIAP support, they have generally covered one or two crops in the states. The PIAP funded reports have provided a natural compliment to the statistical surveys that the National Agricultural Statistic Service have conducted. The NASS surveys cover major crops in major states. The PIAP surveys and reports have served to fill in the gaps. Literally, there are hundreds of crop uses of pesticides in this country that we would have no information on the extent of use of particular pesticides had it not been for the support of the PIAP program in developing these pesticide use surveys.

So, I certainly urge the continuation of support

for pesticide use surveys in the development of the RFP and in the new PIAP. Many of these PIAP funded studies are several years old, they need to be updated. There are still many crops that are falling through the cracks for which we do not have recent pesticide use data and the RFP can address that.

Another factor of PIAP that I think has served us well here in Washington has been the designation of state liaison representatives, these SLRs. Each state has a unique set of pest problems and a unique set of pest control issues, pesticide use problems.

I have been in regular contact with SLRs for the last decade or so and they've been invaluable in terms of answering questions, getting extension service agents to look over data, reviewing the data, certainly, that is in our database. I think that USDA needs this network of SLRs to provide this critical link out to the extension service specialists in each state.

Another kind of report that PIAP has traditionally supported has been the analysis of alternatives to currently used pesticides. Recent commodity reports that have come out of the PIAP program

have looked at pesticides used in cranberries and strawberries, tomatoes, asparagus.

We can certainly debate the methodology that is used in these reports. We can certainly debate the numbers that are in these reports. There is a lot of controversy about the methodology and the numbers and how they are put together but, in my view, these reports have been invaluable because they reflect the views of extension service specialists who are in direct contact with growers, directly in the states who simply ask the question, "Would you please speculate for us what would happen if those pesticides were no longer available?"

They provide estimates, they tell us how important they are, they provide numbers, they quantify those for us. Some pesticides are important, they get a big number; other pesticides are less important, it's smaller.

We all know that EPA has considered many restrictions on organophosphate insecticides over the last several years under FQPA and these two reports, PIAP reports on asparagus and cranberries analyze what would happen to those industries without organophosphate. They

are big numbers for organophosphate.

The conclusions are very dramatic in the report. The asparagus report concluded that without organophosphate there'd be a total collapse of the West Coast asparagus industry. The cranberry report concluded that without organophosphate the East Coast cranberry industry would collapse. Again, we can debate how they came up with those numbers, we can debate the methodology but there is a clear message there that I think everybody paid attention to. There are some important uses here that need to be considered by everybody in Washington before regulatory action is taken.

I think that PIAP probably needs to support studies that more rigorously estimate what the role is of alternatives, that more rigorously look at how we should calculate the economic effects of potential bans. I think there has to be a better way of coming up with these studies than simply asking extension service specialists to speculate what would happen if the chemicals were no longer available. There's got to be a better methodology. I certainly think that the new PIAP should address methodological issues of doing these kinds

of studies.

In my view, perhaps, the new PIAP should focus on setting up an integrated national database on pesticide use, target past, control efficacies, cost of controls, an integrated national database that is built from the state level up.

I think that would be critically important for USDA to have for one basic reason, no one else is going to do it. The agricultural chemical industry is not going to build such an analytical tool. The EPA is not going to build such an analytical tool. If it is going to built, if it is going to be there to evaluate these questions that come up then USDA needs to support this program, develop those databases and make those methodological improvements. Thank you.

DR. LAUGHLIN: Thank you very much. Our next speaker is John Ayers from Penn State University. John.

DR. AYERS: Thank you for the opportunity to provide input to the priorities to be addressed in the request for proposals for the PIAP, Pesticide Impact Assessment Portion of Section 406.

My name is John Ayers. I am a Professor of

Plant Pathology at Penn State University. Since 1987 I have served as the regional coordinator for the Northeast PIAP program, until the mid-1990s this was primarily a grants management role with considerable input into overall program direction through the Inter-regional Coordinating Group, which is the group of other regional coordinators --Rick and Norm spoke already -- plus our administrative advisors who actually set policy for the PIAP program for a number of years.

I differ from Rick and Norm and Catherine Daniels, who will speak in a few minutes, because I do not have a state liaison representative responsibilities. I am just a regional coordinator.

Rick and Norm and Leonard have actually adequately addressed the purpose and role of PIAPs so I'm not going to do that except to emphasize that the program's role has never been more critical than it is now as the agricultural community addresses FQPA issues.

Two things I would like to address very briefly this afternoon. One is the role of states, by this I mean all states in this program, and the need for a complete program that has some kind of stability or

continuity.

It is very clear from the beginning of PIAP in 1976 or 1977 that all states were to be involved. Although I've not seen the original law that was past, that set up, the PIAP program or the transcripts of committee deliberations when PIAP was formed, I have seen the correspondence, meeting minutes, and so forth of USDA personnel and EPA personnel as they were clearly spelling out the role of states in this program. All this correspondence, minutes, etcetera emphasize that all states and territories were possible for it to be involved.

I urge you then to develop the RFP and the funding mechanism that will allow as many states and territories as possible, to participate. If you do not, and others have said this, many state issues and many crops, particularly minor crops, will not be addressed.

In many states PIAP federal funds means people. The job will not be there without these funds. Already there have been critical people lost to the program because of the uncertainty of the funding.

In terms of a complete program, in response to

the 1990 review of the PIAP program and the joining of CSRS and Extension Service the Inter-regional Coordinating Group and the CSREES program staff defined the role or objectives of state liaison representatives. Eleven items were listed as what was required of a state liaison representative to address one way or another in order to have a complete PIAP program. Although not truly competitive, states had to respond to an RFP for funding and they were held accountable to what they said they would do within that response or in their proposal in response to that RFP. Many times states were asked to re-write their proposal and to address all 11 points.

My point in raising this issue is that I wish to suggest that you review this earlier RFP and write the new RFP in a manner that requires all or most of these objectives to be addressed by the individuals funded.

Mr. Melnicoe stated that having this fragmented within states would make it difficult for people to get information and I wish to emphasize that also.

This program must be in place to give the Office of Pest Management Policy the ability to address FQPA issues in a timely manner. Further, I urge you to

provide for multiple year projects, three at a minimum, five would be better, which would permit some continuity to the program and true program development.

This morning Eric Norland addressed the fact that with the Water Quality Program emergency issues could be addressed, PIAP is a good example of how this could happen with the state liaison rep network already in place, when FQPA came along we were in a position to respond very rapidly to the questions raised by FQPA and respond directly to requests for such things as crop profiles, as suggested by the Office of Pest Management Policy.

An additional point, this morning other people mentioned the Integrated Pest Management and Sustainable Ag Programs as a model for funding and management of these new programs in Section 406. I have had considerable experience with both the IPM program and the SARE program and can state quite simply they work fairly well. They are reasonably based programs that address somewhat similar but yet different issues. They are managed similarly and have been successful in all regions. I believe this model could be addressed for

PIAP. Thank you very much.

DR. LAUGHLIN: Thank you very much, John. Our next presenter is Catherine Daniels from Washington State University. Catherine.

MS. DANIELS: Good afternoon and thank you for the opportunity to provide input on priorities to be addressed by the new Section 406 program.

My name is Catherine Daniels. I'm the Washington State Pesticide Coordinator and Pesticide Impact Assessment Liaison Representative.

My comments will address Section 406 as it relates to PIAp and to give you a perspective from a Land-Grant institution. I have conferred with several of my colleagues in the Western Region and the following comments reflect our joint views.

You've heard comments from my colleagues, Mr. Melnicoe, Dr. Ayers, and Dr. Neshiem on the success of PIAP under 3(d) funding. States can support the move to competitive funding and continue to provide quality research, education, and extension programs if the competitive grants program is carefully structured with our mutual needs and goals in mind. I urge you to work

together with us on this.

The complexity of many agricultural systems demands a multi-tactic, multi-year approach to transition them to newer, safer, or more sustainable practices. Only a multi-year funding cycle, such as three to five years, will provide the necessary flexibility to the program.

To conduct surveys of pesticide use, for example, there is a growing season time factor, there is a hiring of personnel time factor, and there is, finally, an establishment of trust factor between the surveyor and the producer.

Trust is crucial. The producer is trusting that your survey will not identify them, that they won't become a target of regulatory action or environmental extremists and NAS Office will echo these comments. So, I urge you to give us adequate time to do the job.

Equal emphasis needs to be placed on the education and extension components as are placed on the research components. Many backbone projects that support research efforts are built using education and extension efforts. We urge you to give us the adequate tools to do

the job.

Agricultural producers are generous with their production information as relates to surveys and such. Only when it is clearly defined where the information is going, how previous information they gave you got used, and how the information might make a difference in the regulatory process; otherwise, they balk. If they balk it is not because they are apathetic or obstructionist, at least not in my state, they are politically savvy and organized.

If they don't feel they are going to get solutions through voluntarily providing information they are very competent in applying political pressure to solve their perceived problem. So, at the Land-Grants we make producers partners in our efforts. A critical component of that relationship is communication, it has to flow two ways. It is not enough for us to collect information at the state level and send it off to Washington, D.C. Information has to be provided from D.C. to be shared at the state level through our extension and educational programs. We urge you to share your information with us.

All PIAP activities that I am aware of, both in my state and in others, have been partnered with other agencies and other funding sources. Thus, consistently leveraging the PIAP funding, which translates into more bang for the buck for USDA. An example is crop profiles, they serve both PIAP and IR4 by identifying and prioritizing crop protection needs. I urge you to give credits to RFP applicants when such partnerships are identified. Give us adequate rewards for leveraging your programs.

An infrastructure is necessary to hang the competitive grants on in order to provide a framework for which a systematic program can be built. Competitive grants are usually narrowly written with clear and non-negotiable objectives.

No matter how much effort is placed in estimating future data needs, however, many times unforeseen situations arise overnight, they require data which is not readily at hand. PIs of narrowly written grants are not going to be willing to take on new outside the grant objectives.

I suggest that the RFP be broadly worded and

have a place for points of contact or state liaison representatives or information centers, et cetera, as yet another resource for the agency and such circumstances this will allow you flexibility in information collection.

In conclusion, the personnel involved in PIAP, at least during my nine years of association with the program, have all been proactive, dedicated to its success, and very interested in providing results that improve the program. These senior people look forward to building a new program under the Competitive Grants Mandate that will serve our clientele and provide objective, fact-based information for use in the regulatory process.

My colleagues in other states and I would like to go on record in saying it is regrettable that no transition period was given to PIAP in moving from 3(d) to competitive funding. We would suggest that in order for USDA to take full advantage of productive programs already in place that an RFP be developed and released as quickly as possible. Some thought should be given to a regionally equitable distribution of funds so that a few

large states are not the recipients of the bulk of funding. Perhaps the previous PIAP algorithm, applied on a regional basis, could serve as a model. Together we can modify an already successful program to be even better.

Thank you again for the opportunity to comment.

DR. LAUGHLIN: Thank you very much. Next person is Eldon Ortman from Purdue University. Eldon.

MR. ORTMAN: I appreciate the opportunity to offer some comments, some observations with regard to 406.

I would also like to endorse the partnership, the networking, the countryside activity that PIAP has so effectively spoken to via the several previous speakers.

The comments I am offering -- I am speaking -- Eldon Ortman from Purdue University but through the collaboration and co-development of comments with Frank Zalom, University of California. We serve as the National Co-Chairs for IPM, appointed respectively by Research and Extension in the Land-Grant System.

This subcommittee has been in place for well over a decade. It is a very broadly based group with

regional multi-state representation. It is interdisciplinary by its very nature, has multiple missions, represents very diverse cropping and commodity systems.

We met most recently in September and as a result of those deliberations offered some comments and some recommendations, both to the Land-Grant System, as well as to CSREES as a partner.

Within each region there exists a multi-disciplinary similarly constituted program and set of committees as at the national level. Many of these people serve on the national committee, plus there is a linkage and a liaison.

These multi-state committees have many roles, including advising Land-Grant and the CSREES system on partnering and priorities, providing a linkage and the coordinating activity between state, regional and organizations within the states out in the countryside.

We bring stakeholder information, concerns, and developments from our long standing association in the states. Each of these regions manages a cooperative, a competitive grant system. Indeed, this group pioneered

in 1993 a joint research and extension competitive grant program and successfully conducted that program since 1993.

The basis for IPM is a distributed state and regional system. The state regional IPM grant has been effective at identifying needs at the local level based on establish stakeholder relationships. The system is established, has demonstrated its capacity and its ability to perform. It would seem beneficial and expedient to directly involve that system in the 406 program or at least leverage that expertise in its further development and elaboration. The system provides an excellent operating network.

Existing national, regional IPM committees could very easily and very well be expanded or modified based on identified needs as you look at the 406 requirements and goals. The regional committees have served the partnership well and we stand ready to be further engaged in program development.

The concept of CAR and RAMP, which are identified within the integrated program came from this very state/ regional/national/federal partnership

dialogue. Thus, it would seem beneficial to continue that partnering in implementing the program.

We need to evolve new operational models to expedite, to enhance inclusivity. We believe new models are possible and are doable. We stand ready to make specific proposals to engage in that discussion. Competitive funding is important, it is desirable, and we support that approach. However, not all research, education, extension, and implementation programs can rely on competitive grant funding. It is a discontinuous process. There is a need for continuity, as previous speakers have so eloquently stated.

There is a need to support infrastructure in the application, the development, the research and education for data collection, and to respond to ever and newly evolving needs in the countryside and in this city as you look at legal and regulatory constraints.

We suggest that a tiered approach is beneficial. NRI serves a very critical role in supporting scientific discovery and IPM draws heavily on that research and that development. Multi-state and regional, based on countryside identified needs, provides a mechanism for

stakeholder input, local involvement in identifying needs, setting research, extension, education priorities.

Infrastructure support to promote coordination, cooperation, complimentarily is critically important, as you, again, have heard from the previous speakers. The multi-state, previously known as regional, research programs have done well, I think, in delivering useful information. Let me give you one very recent example, and pardon my using the North Central Program as that example. NC205, European Corn Borer and the issues that surround BT and refuge development. While it is a regional program headquartered in the North Central there are 20 states involved from 3 of the 4 traditional regions. They have spoken to and given expert advise and testimony to EPA in looking at the implementation of refugia and other issues.

Infrastructure is also needed to leverage local and industry support for programs that are called upon to solve very immediate and evolving problems. PIAP is, or maybe was, one of those very excellent programs on infrastructure support. IR4, SARE, additional models of infrastructure support to address needs.

While a two to three year competitive grants program represents an excellent approach to some needs, it is not ideal or is it well suited to developing applications, systems, implementing, and data collection for IPM systems. It is quite difficult to build and implement a sustainable IPM program based on discontinuous funding. We suggest that a dispersed model will best serve the needs for 406 implementation.

DR. LAUGHLIN: Thank you very much. Are there others who would like to make comments as relates to pest management program? Please.

MR. ELWORTH: My name is Larry Elworth. I am Executive Director of the Center for Ag Partnerships, a non-profit organization that works directly with grower groups and others to implement solutions to a combination environmental and production problems growers face.

I want to speak specifically on pest management to the CAR and RAMP programs if I may. These are programs that, as I understand it, were directly intended to deal with the Food Quality Protection Act and the language that you see in the FR notice indicate that the intention is clearly that these programs make it possible

for new practices to be implemented.

The Crops At Risk Program refers to assisting in a transition, which I would assume means helping growers move from one set of practices to another. The RAMP program is very specific in emphasizing development and implementation of new practices.

Implementation of agricultural practices is not a public sector task, it is done by the private sector, it is done by growers and the people who work with them. In fact, it is done entirely by the private sector. So, if both of these programs were intended to result in implementation then the private sector has to be involved from the very beginning, specifically the grower groups, in order for that to happen, as the program goes forward, any grants that are made, and the RFP in particular, needs to specify the grower involvement and industry involvement as a requirement for securing a grant, if in fact implementation is the goal here.

I would also argue that any of these grants need to be evaluated on a regular basis to make sure that the objective of implementation of new practices is being fulfilled.

My experience with the EFNEP Program, which was set up in somewhat the same way, indicate that this is going to take a special effort on the part of CSREES and the Department. It really means that their involvement is going to have to be something more than a two page or two sentence letter saying that the grower group supports the funding of the project. An implementation plan is going to have to be in place that involves the grower groups from the beginning.

Relevancy of the project to the needs of growers is going to have to be given more than 25 percent weighting in the determination of granting money under these programs. This is a remarkable opportunity for the Department to be of significant use in FQPA. There is a real opportunity here with grower groups and with industry to implement some new practices and to develop some practices that can be implemented.

This money got here through some fairly direct support from the private sector from grower groups with the expectation that this money would be useful to them. I think the Department has an opportunity here to make that promise possible and both to help grower groups and

to help grower groups continue their support for this program. If we don't, I think we are going to leave grower groups with a real problem of dealing with FQPA. The Department won't meet the mandate of the law, which is clear that implementation take place as a result of these programs and we're going to really jeopardize the kind of credibility and support that have been essential between the Department and the grower groups in getting this money there. Thank you.

DR. LAUGHLIN: Thank you very much, Larry. Others who'd like to make comments, please. Any other comments? Yes, please.

MR. HIGHLEY: Thank you. I'm Vernon Highley with Highley Associates. I represent a number of producer groups, upwards of about 50,000 growers combined. I have been in Washington, D.C. for quite awhile. I've been in the Department on a couple of tours and I now work in the non-federal sector here in this city. I want to say that I've helped secure a lot of funding for USDA, largely because of my clientele, but nonetheless I think this is the greatest department in all of government and am very proud of what I see here.

I am very supportive of this CREES program concept. I think if we make it work we'll be able to go to the Hill and get additional funding. So, I want this program to work very much.

I endorse a lot of what Larry has just said. I also know that there is a tendency for the states to want everything to go through a single office and I support that because, like the comments made from California and Florida, I think it is very critical that we do have some kind of state coordination but also I hope that there is some form of appeal that people can go through if they don't -- if they get turned down at the state level, particularly if they are a producer group. I guess that's why some of these clients have me in Washington, D.C. helping them out. If we are all together we will work together and we'll make this thing work. Thank you.

DR. LAUGHLIN: Thank you, Vern. Any other comments?

(No response.)

If not, we'll go on and move into other issues. John Nye who is Dean of the College of Agriculture at the University of Delaware. John.

MR. NYE: Thank you, Chuck. I appreciate this opportunity to comment on the implementation of Section 406 of the Agricultural Research, Extension and Education Act of 1998, which represents a new approach to competitively funded integrated activities in extension, education, and research in targeted areas.

My name is John Nye and I am presently Chair of the Northeastern Regional Association of State Agricultural Experiment Station Directors, an organization of the leadership of the 15 State Agricultural Experiment Station administrators in the Northeast region of the U.S. I am also Dean of the college of Agriculture and Natural Resources at the University of Delaware, and Director of our state's Agricultural Experiment Station and Cooperative Extension Service.

My comments today will be directed to aligning this new authority with the historically important federal/state partnership, a tradition that holds as much relevance and importance today as when it was first established in 19862.

Section 406 represents a great opportunity for

the Land-Grant Universities to extend their work in the important areas deemed worthy by Congress for teaching, research and extension attention. We agree and support the wishes of Congress. We stand ready to engage in this activity. But, w are also concerned for the challenges of programmatic implementation of Section 406. Implementation must be done in a way that supports our history and builds on the federal/state partnership's tradition.

After much though and discussion we are recommending a distributed system for the organization of the integrated activity competitive grants authority in Section 406. Centralization of this program within the agency would be counter to the traditions of the federal/state partnership and would detract from the joint planning necessary for our partnership to function well.

We see the regional Integrated Pest Management program as an excellent example of a distributed, competitive grants program that meets the needs of the partnership and the intent of Congress, just as Dr. Ortman has outlined. But, I'd like to take just a few

minutes to explain how this regional IPM program functions and why it would be just as relevant for the Food Safety and Water Quality programs also.

Regional technical committees are asked to work with stakeholders in developing a set of regional priorities, which are then translated into a request for proposals. The RFP is then submitted to the agency for review and, once approved, is publicly announced. Working with the responsible CSREES National Program Leader, the region's grants manager invites a peer panel who, in turn, selects her panel members, all with the oversight of the NPL coordinator. Peer panels are always made up of a balance of research and extension specialists that are not from that region, thus greatly reducing the potential conflicts of interest. Care is taken to fit the panel to the array of proposals and to give balance to functions, geography, diversity, and disciplines.

After evaluating the assigned proposals and drafting comments the panel meets face-to-face to rank the proposals for several criteria. Evaluation typically includes scientific quality and technical merit;

relevance to the region's priorities; technical feasibility; and the likely impact of the work. The highest ranked proposals are then recommended to the agency for funding.

Here are some of the advantages of the regional IPM competitive grants model:

First, assurance of highest quality activities through peer review processes;

Second, targeted relevance through regional stakeholder input;

Third, greater responsiveness to regional needs;

Fourth, proven integration of the institutional functions of research, extension and teaching through this competitive grant process;

Fifth, multi-state participation in specific projects; and, finally,

Extra-regional participation through multi-institutional projects.

To this last point I wish to dispel a myth. Regionalization does not mean strict boarders to participation. In fact, our history of regional research is often misrepresented as regionally bounded, when in

fact more than two-thirds of our base program's regional activities involve investigators from three or more regions. Moreover, federal agencies, private sector research laboratories, state agencies, and other institutions commonly participate through their own funding. But, must importantly is the extent to which extension and research projects are already integrated within and across regions in dozens of formal and informal projects and activities.

We are proposing that the implementation of Section 406 be built on the institutional strengths, not create a divisive competition within and between Land-Grant Universities. We strongly recommend a distributed process that uses the best of the regional IPM program's innovations to move us forward as a partnership.

Thank you for this opportunity to comment.

DR. LAUGHLIN: Thank you, John. Next will be James Clark, representing AASCARR. AASCARR are those colleges which are non-Land-Grant but have very active agricultural programs.

DR. CLARK: Thanks for the opportunity to make comments. I am here representing AASCARR, which is the

American Association of State Colleges of Agriculture and Renewable Resources. Now you know why we say AASCARR and not all that other.

I represent an organization that represent approximately 55 state colleges, public non-Land-Grant universities emphasizing education in agriculture and renewable resources. Many of our institutions also have programs in graduate education, research, and public service.

AASCARR institutions provide quality educational programs, contribute to the training of under-represented groups for careers in agriculture and renewable resources, and partner with their communities in engaging in educational programming to implement new technology.

AASCARR is dedicated to promoting leadership in agriculture and renewable resource academic programs by advocating the members' collective interest, needs, and values to the agriculture industry policy makers and the public, providing the forum to disseminate information, address critical issues, and solve problems and share ideas, and facilitating the development of innovative, forward looking programs that ensure sustainability of

food and agricultural systems, and also developing priorities for globalization of academic research and outreach programs.

AASCARR supports the establishment of the new integrated account under Section 406. Creating an account that is open to all to competition from all colleges and universities enhances the funding opportunities for the highest quality and most relevant projects.

As you know, a well-educated workforce is a requirement for a secure strong future of agriculture in the United States and also globally. This workforce must be knowledgeable about the latest technology and research to preserve the availability of inexpensive yet high quality source of food for the American consumer. Increasing the opportunities for quality research, education, and extension programs and preserving the vital element of open competition for all colleges and universities are the foundation for a strong agrarian future.

AASCARR worked very closely with the Academic Program Section of NASULGC Board on Agriculture to

promote academic programs in agriculture and renewable resources allied disciplines, such as human sciences and family and consumer sciences and the Office of Higher Education Program Chair within the department.

Our recommendations are that the program be open to all colleges and universities and that education, higher education, have an equal partner at the table with research and extension. Thank you for the opportunity.

DR. LAUGHLIN: Thank you very much. We've been sitting about 55 minutes. Let's take two minutes to stand up and make sure our blood moves and then we'll continue.

(Whereupon, a brief recess was taken from 1:51 p.m. to 1:56 p.m.)

DR. LAUGHLIN: Our next presentation will be Ferd Hoefner with the Sustainable Agriculture Coalition. Ferd.

MR. HOEFNER: Thank you. I hope everybody cooled off just a little bit during the break anyway, as much as is possible.

My name is Ferd Hoefner. I'm the Washington Representative for the Sustainable Agriculture Coalition.

On behalf of the 13 farm and rural member organizations of the coalition, we welcome this opportunity to present our comments.

I would note at the outset that we chose to testify at this point in the proceedings, not because we might not have had much to say about the specific programs and topics and issues but, I guess, from a sort of fundamental belief that how a program is structured and the rules that it operates under are as important as the issue content in terms of actually delivering the program. So, I want to address this new authority in a sort of general way.

I would start my remarks by first just asking the question, "Why integrate to begin with? Why does this authority exist?" Obviously there are rationales related to cost effectiveness and bureaucratic efficiency and so on and so forth but I think fundamentally there are some real important bedrock issues that are central to the Land-Grants and to the federal/state partnership at stake here. Namely, research that is intimately connected to real world considerations, educational and dissemination of objectives built into actual research

and extension projects, extension serving its historic two-way role of communicating research results but also bringing the feedback back with on the ground input back into the research programs and so on. I just raise those at the outset because I just think those are really important things to remember as to why this exists to begin with.

I would make just a few quick comments about things that we believe should be in the program, proposed rules for the program and guidance that follows. First, as has been said by many speakers now, we think that regional structure should be adopted to deliver these programs, as in fact has already been the case with some of them. So, we would support a national coordinated but regionally administrated structure.

As the program develops in future years the bulk of funding should be reserved for distribution at the regional level with perhaps some held back at the federal level for national priorities that may emerge from time-to-time.

The regional approach, I would note, foster widespread participation, which I hold as a very key

value here, and also helps target the program on clear regional needs and priorities. It also, not unimportantly, helps with the distribution of funds and that helps in terms of continued funding in the future.

Second thing that we'd like to see in rules would be a requirement that integration happen at the project level, not just at the program-wide level, as important as that is in itself but it should be a requirement of each successful program project that gets awarded that there be a real consideration of integrated functions within that project.

Third, I think that farmer participation in all aspects of the program is absolutely critical. This is a very, sometimes, difficult objective for USDA research programs to achieve so I think it has to be very explicit and I think it has to be something that's worked on with all due deliberations.

Let me note that farmer participation, in our view, is not just annual submission of ideas for priorities but goes to all aspects of the program, from program development and redirection to priority selection to review panels to the actual research and extension

projects themselves to communication strategies, oversight evaluation, the whole nine yards.

Fourth, I think the program should evolve into a broad-based multi-institutional partnership. Here I would note that the partnership should include researchers, educators, extension agents, for sure but also agency representatives, farmers, growers, non-governmental organizations, business, and others. Again, I think the rules for this new authority should be very explicit in terms of requiring that kind of partnership.

Fifth, I think encouragement should be given to on-farm research and demonstration and training, wherever appropriate and I hope that that would be appropriate in many many instances.

Sixth, I think there should be a strong focus on systems research. Again, I think experience shows that unless this is explicitly required and promoted that you don't get very much of it and, I think, therefore, major attention and emphasis should be given to inter-disciplinary whole farm, whole food system, natural systems, and area-wide research demonstration, decision, support, and training kinds of activities, not to the

exclusion of component research but certainly as a major priority.

Next, I think that there should be a requirement for communications to be built into every proposal. In other words, some explicit plan on how to communicate useable results from any awarded project to the intended user community and also to the general public. This not only is critical in terms of building an effective results oriented program but also in capturing public interest and, hence, future public dollars.

Next, I would urge that the structure of the program incorporate economic, environmental, and social impact assessments and analysis. Again, unless this is required it does not get done very often. We believe that technology assessment should be built in on a program-wide basis but also on a project-by-project basis there should be indications of exactly what is predicted and then after the fact what is assessed in terms of particularly environmental and social impact.

Two more and I'll end. One is that project evaluation should be done on multiple criteria, including, very importantly, relevance, in addition to

technical merit. And finally, that there should be very clear and enforceable strict conflicts of interest rules that apply to the program.

One other point that I want to raise is that I think this new authority gives a great opportunity to encourage research that will foster and encourage independent small and moderate size family farms and help the department in fulfilling one of the recommendations of the National Commission on Small Farms, which called for two-thirds of competitive grants funding to be small farms directed. That is also in keeping with the new USDA Small Farms Policy recently enacted, which calls for, in part, research programs directed in this way. So, I think that is a great opportunity.

I would note that Section 407, the very next section of the Research Bill from 1998 on Coordinated Research, Extension and Education around Small and Moderate Sized Live Stock Production is, for us, a very key section that still goes unimplemented. I think 406 is an excellent place to get it implemented and would urge due diligence to get that off the ground just as quickly as possible.

Finally, I would note that as this program matures and develops under its new authority that there should be efforts made to coordinate more closely with the national research initiative, both in terms of allowing the 406 programs to take and run with research results from NRI and adapt them to on the ground realities but also in terms of that on the ground reality coming back as a feedback group into NRI's research priorities. I think that is an important area to explore in the out years as this program develops. Thank you very much.

DR. LAUGHLIN: Thank you very much, Ferd. Next I'm going to introduce at the same time Jacquelyn McCray from University of Arkansas at Pine Bluff and she will be followed immediately with Sam Donald who is the Regional Research Director for the 1890 institutions. Jackie.

DR. MCCRAY: Good afternoon. My name is Jacquelyn McCray and I am the Dean and Director of 1890 Research and Extension at the University of Arkansas at Pine Bluff. I also Chair the 1890 Association of Extension Administrators, representing the leadership in extension for the 18 Land-Grant universities organized

under the 1890 legislation.

Thank you for allowing us the opportunity to provide input on the Integrated Research, Education and Extension Competitive Grants Program. Together with my colleague, Dr. Donald, who is Regional Director of the 1890 Association of Research Directors, we represent the extension and research activities in these universities. My testimony will begin our presentation, which will be concluded by Dr. Donald.

The rich legacy of the land-grant tradition remains prominent on the campuses of the 1890s. These institutions have exemplary influence in the lives of all citizens, including African Americans and other minority groups. While enduring inequities in state and federal funding, the 1890s serve as exemplary role models; they provide educational access to those who may otherwise be denied the opportunity to pursue a college education; and they foster an unyielding commitment to academic excellence, social equality, and the assurance of a decent future for all served by our institutions, including those from the lowest socioeconomic strata of the nation. These universities have been in the

forefront of educating youth-at-risk, producing research vital to the quality of life and the environment, and addressing the social and economic needs of urban and rural communities. Teaching, research and extension remain prominent on our campuses.

Our community has an interest in Section 406 program, not only as a part of the Land-Grant System, but as 1890 institutions we feel there are particular elements that need to be addressed, given the unique opportunity to design this program to accomplish its goal of integrating research and extension and to address real world issues.

I would like to present the following issues: As we all know, and as many speakers before me have stated, Section 406 of AREERA was established to provide funding for integrated, multi-functional agricultural research, extension and education activities. This charge is quite different form the purpose of the National Research Initiative, currently CSREES's largest competitive program to date.

Although we understand the immediate impulse to model Section 406 after NRI, we strongly oppose that

course of action for three reasons. First, the different goals of the programs; two, the matching fund problems within the 1890 community; and, three, the lack of opportunity for these and other institutions within the NRI program.

First, NRI was established to promote basic research. Proposals funded through the NRI program ask specific questions and set out to find specific answers. Within this program there is no link between the answers discovered and the delivery of answers to farmers and ranchers.

Within the NRI, a missing element is congruence between basic research and outreach and education. The mediary, which we believe is applied research, is needed to ensure useful application of basic research findings to real world problems. This is where the Section 406 program can play a role. These proposals should promote programs that take the answers found through basic research and study the collateral effects and practical application. Thus, making the findings useful to the practitioners. However, if 406 is operated by the same approach as the NRI this will not be allowed to happen.

Thus, disallowing the original intent of Section 406 program as a multi-functional research and extension initiative.

Second, a serious problem among the 1890 institutions is the matching requirement, contained both within the NRI and Section 406 grant programs. Approximately one-third of the 1890 institutions have asked the Secretary to waive the mandatory matching requirement for Fiscal Year 2000 in order to receive formula funds they need to survive.

Given this environment and the fact that many state legislatures have already established their budgets for the coming year, it will be difficult for our universities to ask for additional matching funds.

We ask that USDA and CSREES work with the 1890 community to find ways to solve this problem and to allow all land-grant universities to benefit from this program.

Finally, as one of the groups of Land-Grant institutions previously excluded from full participation in NRI and as 1890 institutions, we are concerned that our community will not be given the opportunity to participate fully in Section 406 if it is implemented

with the same philosophy as NRI.

Data evaluated from the Budget Explanatory Notes provided by USDA to Congress illustrates why this concern exists. From FY1994 to FY1998 the 1890 institutions submitted 207 research proposals, totalling $36.5 million in requests to the NRI. Of these 207 proposals, amazingly, only 6 were funded, representing 1.1 percent of the funding requested.

The total funding to NRI for these 5 fiscal years, 1994 through 1998, was an aggregate amount of $489,332,000. The 6 proposals awarded to the 1890 community totalled $405,000, which is 8/100 of 1 percent of the total amount appropriated.

It would be a great disservice to our institutions and the American citizens we serve to allow these results to continue by structuring the Section 406 program within the same jurisdiction as the NRI.

The research and extension efforts of our universities are vital to the communities we serve, and we have demonstrated our capacity to provide integrated, multi-functional research, extension and education activities.

At this time, I would like to turn the presentation over to Dr. Donald, who will discuss some of the integrated problem solving areas where we believe the 1890 institutions could make a significant contribution if given the opportunity. Dr. Donald.

DR. DONALD: Thank you Jackie. I too would like to thank Chuck and CSREES and USDA for the opportunity to appear here today and give a testimony on behalf of the Association of Research Directors of the 1890 Land-Grant universities.

This presentation represents an integrated approach to solving problems. We do have a problem as it relates to trying to convince USDA to do what we think would be best in terms of handling these Section 406 funds. And, so, Jackie and I represent an integrated model. She is the pretty and I am the ugly.

(Laughter.)

Our community has extensive examples which illustrate our ability and commitment to address real world problems, real world integrated problem solving activities, which is a major goal of Section 406. I will share with you three of these examples.

First, while large segments of the older population live in rural areas, little is known about their status relative to quality of life and well-being. Recognizing this gap in the literature, scientists from the 1890 institutions initiated a regional research project entitled, Quality of Well-Being of Rural Southern Elderly: Food, Clothing and Shelter to conduct a comprehensive study of the rural elderly population.

The purpose of this project was to determine the quality of life of rural elders by assessing the actual and perceived status of nutrition, clothing, and housing, and the interdependence between and among the status parameters. Extension counterparts carried forward the crucial outreach at a number of our institutions to rural elders and their service providers.

The second example deals with small farms. Small farmers from the southeastern United States and other areas around the nation are struggling to survive. Directing attention to alternative agricultural enterprises and other types of enterprises can make a significant contribution to the economic well-being of small farmers. This is especially true for

southeastern farmers and others who are seeking viable production alternatives to growing tobacco and other row crops.

For example, the U.S. goat industry, at one time, lacked the necessary expertise and technologies to met the growing demand for quality goat products. The 1890 Institutions, through integrated research and extension programs and other activities have been the leaders in developing technology and management systems needed to give the necessary momentum to the newly emerging small ruminant industry.

Given this new technology, a growing demand globally for nutritious goat products and the influx of ethnic groups, with a preference for goat meet, the industry has experienced tremendous growth within areas served by the 1890 Institutions.

The third example deals with aquaculture. Aquaculture is not only one of the fastest growing segments of U.S. agriculture, it is one of the fastest growing food production activities in the world. Being given the sole responsibility for developing the state aquaculture industry, 10 years ago the University of

Arkansas at Pine Bluff, an 1890 institution in the State of Arkansas, integrated its research, extension, and education program in aquaculture, with emphasis on improving catfish and bait fish production and marketing.

Arkansas has now moved from the fourth to second as a catfish producing state in the United States and is now the largest bait fish producer in the country. Its integrated program was designed 10 years ago in the very image of Section 406. In 1998, per capita consumption of seafood in the United States was 14.6 pounds. The United States trade deficit in edible fisheries products is $5 billion per year, with shrimp alone being among the highest producing areas and it averages about $2 billion.

In 1998, total shrimp imports reached $3.1 billion, an increase of 5 percent from the previous years.

The 1890 Institutions have aided in the economic growth of the aquaculture industry by providing hatchery and nursery production of aquaculture species, such as stocker-shrimp and hybrid striped bass. In addition, there is continuing research being done at 1890 Institutions on freshwater shrimp, paddlefish and its caviar. Because of the role of the 1890 Institutions,

the role that they have played, aquaculture is a great example of how a growing industry benefits the whole economy.

In closing, the funding available through Section 406 program can create real world opportunities of great results. However, this is dependent upon establishing a structure where the entire community can benefit and the mission of Section 406 program can stay intact. We would be more than willing to work with appropriate officials to ensure a fair opportunity for the 1890s and other minority serving institutions to help accomplish the goals of Section 406.

We too can help solve the nation's water quality problems, food safety, pesticide, and other problems that Section 406 will be sure to address.

Again, we appreciate the opportunity to provide input and we look forward to helping to make this program a success.

I might add, one way of ensuring its success is to give all the money to the 1890 Institutions and we'll make sure you have an integrated program.

(Laughter.)

Because knowing that time would not permit, we have included a more extensive list of potential areas where the 1890 Institutions could contribute to further integrated research and extension activities in an addendum to our testimony. On behalf of Dr. McCray and myself, and the chair of our association, the chair of the Association of Research Directors, Dr. McArthur Floyd, who would have loved to have been here today but I believe CSREES has a team on his campus looking at some of his activities and so he asked us to pass on his regrets that he could not be here.

We respectfully reserve the right to revise and extend our remarks beyond our testimony for the duration of the time that the testimonies will be available, the opportunity will be available. Thank you for the attention.

DR. LAUGHLIN: Thank you, Jackie. Thank you Sam. Next, Dave MacKenzie. Dave is the Executive Director for the Northeastern Association of State Agriculture Experiment Stations.

MR. MACKENZIE: Thank you, Dr. Laughlin. I want to publicly express my appreciation for the opportunity

to speak publicly and reflect on the fact that the World Trade Organization meetings in Seattle is in my mind as one of the reasons that there is so much demonstration up there, apparently is the World Trade Organization won't listen to their critics. One of the great things about our democracy is the fact that we do have meetings like this where people have a chance to express their differences of opinion. It has been very rewarding for me today.

I am representing today the Chair of the Experiment Station Committee on Organization and Policy, or ESCOP as we call it, of the National Association of State Universities and Land-Grant Colleges. ESCOP's Chair, Richard Jones, couldn't be with us today because of a medical emergency his mother had and he is taking care of her like a good son. So, he asked that I stand in for him. Under normal circumstances the Southern Region's Executive Director, my counterpart, Tom Helms, would be here but Tom is suffering from a respiratory infection so I was asked to do that.

My name is David MacKenzie and I am Executive Director for the Northeastern Regional Association of

State Agricultural Experiment Station Directors and a member of the ESCOP Chair's Advisory Committee. The responsibilities have fallen to me only recently but we have had a chance, through conference calls, develop a position consensus document.

My comments today are not to be taken as a general consensus within our community because there are in fact notable disagreements within our research community regarding the best approach to the implementation of Section 406 of the Agricultural Research, Extension and Education Reform Act of 1998. However, in our community we have a very strong desire to align our comments with those of our functional counterpart, Cooperative Extension.

Some of us would simply defer to the national extension leaders and avoid the unseemly division that might appear. Others see a need to build on our successes and learn from our experiences, even though that takes us in a direction different from our extension counterparts. Thus, we have a disagreement over how best to proceed. But, before I get to that disagreement, let me share with you a vision.

The State Agricultural Experiment Station community, or SAES, as we call ourselves, foresees the further fulfillment of the Land-Grant University paradigm of integrated research, teaching, and extension activities through new and expanded partnerships with the U.S. Federal Government.

The SAES Directors are funding an innovative experiment in partnership building called SUNEI. Mary Ellen Devitt spoke to you this morning about SUNEI and you've heard those comments already.

We see SUNEI as a concerted effort in partnership with CSREES to build bridges to other federal agencies that share our agenda on agricultural and environmental issues. We received a warm welcome from these contacts and we are looking forward to building interest in working together.

The Land-Grant University/CSREES partnership's unparalleled success this century no doubt serves as a model for others to follow. But, as well, e need to look at our partnership's strengths and to learn from that experience about how we can do better. The message from Congress in 1998 in the AREERA Farm Bill was clearly,

among other things, more stakeholder listening, more multi-site collaboration, more integrating of activities, and more accountability. We need to consider these points in the implementation of any new federally funded programs. Given our institutional interests, experiences, and the understood messages from Congress, how might Section 406 competitive grants program be implemented, I ask.

There will be a need for mechanism to assure that stakeholder needs are addressed through listening sessions and transparent priority setting exercise. There will be a need to assure the quality and relevance of proposed activities through peer and merit reviews. There will be a need to facilitate multi-institutional activities. There will also be a need to integrate our functional activities. And, there will be a need to provide adequate accounting for the promised deliverables. How might his best be done in a partnership?

As a former employee of the Agency, I feel confident in mentioning that the funding available for managing a competitive grants program with CSREES is

inadequate. Additionally, staffing caps and location costs work against internalizing the entire grants management process. Moreover, the Agency's current policy against pooling grant funding with partner federal agencies, which I understand is based on an interpretation of the USDA's Office of the Inspector General, significantly limits any strategy for leveraging Section 406 appropriations.

We propose a partnership approach to the management of Section 406 that builds on the comparative advantages of our component institutions. We are proposing a regional approach that:

One, allows greater focus on regional stakeholder needs;

Two, avoids conflicts of interest in the review process by drawing talent form outside the region;

Three, permits multi-institutional, integrated activity-collaborations to form; and,

Four, gives strong support to impact assessment of the outputs and outcomes from current and past investments.

We see the regional Integrated Pest Management

program, or IPM, and the Sustainable Agriculture Research and Education program, or SARE, as the most appropriate examples from which we can draw experience. Both programs manage a competitive grants program that is functionally integrated, multi-institutional, and a model of accountability.

We see great opportunity to seek matching funds from other federal and state agencies and from the private sector. Previous discussions with EPA, NASA, FDA have led us to conclude that great interest exists in such a strategy, if done as a partnership and with joint funding. We believe that the funding made available through Section 406 could be more than doubled through matching funds.

We are not harmonious with our national extension counterparts on the point of centralization versus regionalization of Section 406. We agree with our extension counterparts that Section 406 should not be administered in the same unit that administers the National Research Initiative, or NRI. But, we do not agree that CSREES should be discouraged "from administering these funds on a regional basis, or some

variation thereof," which is testimony that is going to be presented to you in a moment. We are proud of our shared successes in regional IPM and SARE programs. We believe that regionalized management of Section 406 is the best of all choices.

We are endorsing the requirement that the Section 406 grants be awarded competitively, based on reviews of proposals for scientific quality and the relevance to stated priorities. ESCOP has long supported the use of peer review as a device for selecting the most appropriate proposals. Moreover, our interest in partnering with additional federal agencies will require that high standards be used for the selection of the best proposals.

What we are not proposing is the distribution of Section 406 monies to the regions, only regionally organized partnerships for deciding priorities, managing the reviews, and providing accountability. CSREES would retain all fiscal and audit control, while gaining access to partner institutions' resources and staff support.

In the normal organization of a competitive grants program review panels are matched to portions of

the available funding. we are proposing that instead of dividing food safety or water quality into arbitrary national categories that each region be given a voice in the stakeholder listening, priority setting and planning processes.

The Northeast Region has already begun to identify its food safety priorities, you heard from Jeff this morning. We are proposing to you that a program of responsive activities organized in ways not possible through national priority setting. We are proposing integrated activities too difficult to achieve nationally. We are proposing multi-state activities, unlike anything heretofore experienced. We are envisioning degrees of multi-institutional accountability never before seen.

I ask, "Can CSREES hope to implement a multi-million dollar grants program without the Partnership's participation and support?" While NSF administers its competitive grants program for seven percent of its appropriation, CSREES gets but four percent for administration. While NSF might complain that seven percent is not enough to do a good job, CSREES struggles

to make ends meet. Is four percent for competitive grants administration realistic? Obviously, it is not.

We are proposing that our successful experiences in competitive grants management should be applied to the questions of Section 406 implementation. Our Partnership needs to build on our success and not try to reinvent success at every opportunity.

We believe that our differences with our extension counterparts are minor and resolvable. We see these differences as primarily for management-cost containment and not on programmatic substance. We also agree on the need to manage these funds wisely and to be fully accountable. But, our experience with regional programs has served us well and we would be remiss in not noting the success that we have had and the value that these experiences brings to this set of program management questions.

And, please, let us note for the record that in the end no matter what is decided for the implementation of Section 406, we are most willing to integrate our activities with Cooperative Extension, for that is our institutional paradigm.

Thank you for this opportunity to comment for the record.

DR. LAUGHLIN: Thank you, Dave. Our next presenter is Dan Godfrey. Dan is the Chair of ECOP, which is the Experiment Station Committee -- excuse me, Extension Committee on Organization and Policy, he is also from North Carolina A&T.

MR. GODFREY: Thank you, Chuck. Let me point out right here in the outset that my statement is the result of interface and dialogue with members of the ECOP Executive Committee, members selected individually by telephone conversations and otherwise, and, of course, I've had some dialogue, as Dave mentioned, that Richard Jones couldn't be here and the reason he stated to me as well, but we've talked two or three times this week in regards to the issues. So, I just wanted to make certain that you are aware that we have had input and the ECOP Exec represents the regions of the country but by no means have we yet had the input of the entire ECOP committee because it really has not convened but we did have discussion at the sectional meetings in San Francisco regarding the issue.

I want to thank you for the opportunity to officially comment on the implementation of the Integrated Research, Education, and Extension Competitive Grants Program, more specifically known as Section 406 of The Agriculture Research, Education, and Extension Reform Act of 1998.

The comments I offer today are done as the ECOP Chair, as the Chair of the ECOP Policy Committee, representing, of course, some 75 Land-Grant institutions. I guess if we count some of the other 94s it takes us to a number of almost 104 such institutions.

Chuck has already mentioned by title and my location. I'm Dean of the School of Agriculture at North Carolina A&T but also Extension Administrator and Research Director.

The Section 406 authority was quite well known by our State Extension Services administrators from the time it was considered for inclusion in AREERA. The concept and intent of Section 406 was generally supportive, as I mentioned earlier, by State Extension Services Directors. These same people and others in the extension system have two major concerns.

First, when the basis for funding the account appeared in the FY2000 Executive Budget the State Extension Services at the administrative and program levels expressed significant concern. The primary concern was the movement of existing 3(d) program funds for three high priority programs into this account.

Food Safety, Water Quality and Pesticide Impact Assessment are not minor programs in the Extension System, by no means; quite the contrary. The main concern is that a significant amount of these 3(d) program funds were long time monies that are currently being used for faculty salaries and operating expenses, as others have mentioned, and for providing specialized leadership for these programs.

It is the faculty that would have provided leadership for an expanded program in these areas with the additional funds that Congress appropriated to this account. In too many situations these faculty will and are being terminated because of the long-standing funding sources for these very high priority programs and that's a real concern and it is uncertain. This will be a difficult transition year for these three programs and

for the faculty who have provided the leadership for these programs over the last several years.

We respectively ask the CSREES to use every possible option available to help the State Extension Services through this transition year and because the lead time is so short make physical and difficult adjustments as best as possible.

The second significant concern that we offer comment is in the manner in which the Section 406 account fund is administered. There are two aspects of this matter. One is the time frame, as I just mentioned, when CSREES has access to the funds and the other is the awarding of these funds to those who are successful in the competitive grants process.

It is imperative that this time frame be something considerably less than 12 months. We recommend this time frame to be not more than 4 to 6 months, operating with year-to-year funding for educational programs is tedious and in terms of the quality of programming and the faculty retention problems we face, without adding the burden of learning toward the end of a given year that you may or may not have the needed

funding to continue a program.

The other important aspect of administering this fund is how grant proposals are reviewed. Very specifically, we recommend a merit review process, a merit review process, as defined in AREERA, rather than the peer review process. The latter has a long track record of being very time consuming. One of the examples that we've seen at the national level has been the Youth and Family at Risk Initiative and how that has been administered with much success.

We think that initiating a new merit review process is an opportunity to streamline the decision making and to assure not only quality of programs but also stress relevance to the real world issues. After all, relevance appeared to be one of the intents of Section 406. So, we stand ready to provide advice, guidance, and faculty support in your deliberations on this merit review process, its design, and subsequent implementation.

The merit review process will allow states to use local input, we have heard that discussion here, rather than all guidelines coming from the federal level.

Many water quality issues are regional in nature and are not necessarily national in nature, though some such as the "Hypoxia" issue do involve between 20 and 37 states, depending on how many states one considers to be in the water shed.

Lastly, we recommend the funding allocation process be managed by CSREES, either by a specific unit for this purpose or by the agency's relevant program units. We are not supportive of the Section 406 account being administered in the same unit that administers the National Research Initiative. Our reason is that the purpose of the 406 funds is so different than those currently administered under the NRI, which is primarily basic/fundamental research.

Section 406 funds are intended for more action-focused research and education. Establishing a streamlined action focused review process could serve as a hallmark of state/federal partnership review process that would involve both entities of the partnership to the fullest extent permissible under current law and regulations.

A process that best serves the agency, the state

partners, and most importantly, the public, is very important because it is likely more than federal funds being appropriated to CSREES to administer and that will be, in fact, in the form of competitive grant mode.

It is for these reasons we would discourage the CSREES from administering these funds on a regional basis or some variation thereof. Why have several entities that will need duplication of merit review systems and fiscal accounting? One well managed review system, with maximum involvement of the partnership, seems most efficient and effective, and can accomplish the intentions of Section 406, namely integration, multi-state, multi-institutional, and an interdisciplinary focus on the significant national, state, and local issues.

The manner in which the competitive portion of the Water Quality monies for Extension has been administered for nearly a decade is a prime example of this recommendation.

We appreciate this opportunity to present our general thought and specific recommendations on the implementation of 406. The State Extension Services

stand ready to assist in the successful implementation of this budget authority. I want to thank you for this opportunity.

DR. LAUGHLIN: Thank you very much, Dan. Anyone else care to make any comments? Don't be shy, because we want to hear it.

(No response.)

If not, we want to thank each and every one of you for taking time from your schedules to come join us. As we said, the comments from today, we anticipate, will be on our Web site on December 10. Additional written comments will be accepted through December 17. Thank you all. Travel safely. We really do appreciate your input and the time and effort that you provided to us. Thank you all very much.

(Whereupon, at 2:45 p.m., the hearing was adjourned.)

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Solicitation of Input from Stakeholders
Name of Hearing or Event

N/A
Docket No.

Washington, DC
Place of Hearing

December 2, 1999
Date of Hearing

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