

CENTRAL PLANT BOARD:
Illinois -- Indiana -- Iowa -- Kansas -- Michigan -- Minnesota -- Missouri
North Dakota -- Nebraska -- Ohio
South Dakota -- Wisconsin

SOUTHERN PLANT BOARD:
Alabama -- Arkansas -- Florida -- Georgia -- Kentucky -- Louisiana
Mississippi -- North Carolina -- Oklahoma -- Puerto Rico -- South
Carolina -- Tennessee -- Texas -- Virginia



EASTERN PLANT BOARD:
Connecticut -- Delaware -- Massachusetts -- Maryland -- Maine
New Hampshire -- New Jersey -- New York -- Pennsylvania
Rhode Island -- Vermont -- West Virginia

WESTERN PLANT BOARD:
Alaska -- Arizona -- California -- Colorado -- Guam -- Hawaii -- Idaho --
Montana -- Nevada -- New Mexico -- Oregon -- Utah -- Washington --
Wyoming

PRESIDENT
GEIR Y. FRIISOE
MINNESOTA

VICE PRESIDENT
WAYNE N. DIXON
FLORIDA

SECRETARY-TREASURER
ANN GIBBS
MAINE

PAST PRESIDENT
MIKE COOPER
IDAHO

EXECUTIVE SECRETARY
AURELIO POSADAS
P.O. BOX 847
ELK GROVE, CA 95759
916-709-3484
AURELIOP@ELKGROVE.NET

DIRECTORS

CENTRAL PLANT BOARD
PHILIP MARSHALL
INDIANA

JULIE C. VAN METER
NEBRASKA

EASTERN PLANT BOARD

CAROL HOLKO
MARYLAND

DANA RHODES
PENNSYLVANIA

SOUTHERN PLANT BOARD

MIKE EVANS
GEORGIA

LARRY NICHOLS
VIRGINIA

WESTERN PLANT BOARD

MITCHELL YERGERT
COLORADO

ROBERT LEAVITT
CALIFORNIA

September 4, 2013

Osama El-Lissy
Deputy Administrator
USDA, APHIS, PPQ
Room 301-E, J. L. Whitten Federal Building
14th Street and Independence Avenue SW
Room 301-E
Washington, DC 20250

Dear Osama,

The National Plant Board (NPB) membership recognizes and appreciates the importance of cooperative agreements between state regulatory and federal agencies and the importance of accountability for how public funds are spent. The agreements that we have with USDA-APHIS-PPQ are especially important for pest detection and response efforts needed to protect our agricultural crops and forest environments. We believe that part of that accountability and our responsibility as public employees is to ensure that allocated funds are delivering and accomplishing the work intended under the agreement. The NPB is however concerned that these agreements are becoming increasingly burdensome from an administrative and reporting perspective, which results in a need for states to divert resources away from work deliverables.

In order to improve the cooperative agreement process, the members of the NPB respectfully ask that USDA-APHIS-PPQ consider the following:

1. We acknowledge and appreciate the initial steps that USDA APHIS PPQ has taken to engage the NPB in addressing concerns. Continuing this dialog with active attention and clear deadlines will promote consistency and uniformity in the administration of cooperative agreements.
2. As part of future dialogue, we encourage your program managers to engage with state cooperators in order to learn what is required operationally to conduct the surveys and eradication projects under their purview. We think this would help alleviate perceived or real micromanagement of work plans and financial plans. USDA APHIS PPQ has lost a tremendous amount of operational experience over the past several years and the states are able and willing to provide needed background and knowledge.
3. Develop an online automated system for cooperative agreement administration.
4. Simplify, streamline and reduce reporting requirements, and micromanagement of program implementation.
5. Limit program accomplishment reporting to a single annual report.

6. Bundle financial reports so there is one set of standard cooperative agreement language and financial reports for all cooperative agreements for a given cooperator or consider the development of a bundled block grant agreement that would allow states more flexibility to respond to local situations and needs.
7. Develop agreements with an emphasis on results and accomplishments that defer to states to make decisions on details such as trap placement, staff assignments etc.
8. Provide full financial reimbursement to states for the cost of cooperative agreement administration, project tracking and project reporting above and beyond the indirect rate. Reimbursement should include average costs paid out by states for unemployment claims which often are incurred long after the expiration of the agreement.
9. Reimburse states the cost of responding to USDA audits and the costs of requests for additional reports, maps, or data entry not included in the original agreement.
10. Develop a process for multi-year agreements.

The NPB looks forward to working with USDA-APHIS-PPQ to strengthen, streamline and ensure efficiency and accountability of the cooperative agreement process.

Sincerely,



Geir Y. Friisoe

CC:

Paula Henstridge, USDA-APHIS-PPQ
Philip Marshall, Central Plant Board President
Carol Holko, Eastern Plant Board President
Mike Evans, Southern Plant Board President
Mitch Yergert, Western Plant Board President