



EASTERN PLANT BOARD

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Secretary Jeff Witte
NASDA President
4350 North Fairfax Drive #910
Arlington, VA 22203

April 30, 2019

Dear Mr. Witte,

States rely on Cooperative Agreements issued by the USDA to conduct surveys for insects and diseases that could have negative impacts for agriculture and the environment. These are critical surveys as they: 1) support trade, 2) inform management decisions, 3) inform stakeholders about local pest threats, and 4) allow for rapid identification, containment and control measures against exotic invasive species. Survey timing for destructive insects and pathogens is informed by organisms' biological life cycles rather than budgetary or political timelines. When surveys cannot be conducted at the relevant time in the organisms' life cycle, efforts and opportunities to mitigate risk and damage are wasted. States require time to hire personnel and provide resources after Cooperative Agreements are signed. Often, Cooperative Agreements are the sole funding source for personnel that conduct survey work. Without timely funding, the work will go undone and awarded funds will need to be de-obligated. Recent delays in the funding of Cooperative Agreements have caused nationwide problems for state's surveys and cooperative programs.

It is the understanding of the Eastern Plant Board that recent delays in Cooperative Agreement funding are due to a change in the Agreements process. Deputy Secretary Steve Censky explained on a NASDA conference call that this change was implemented to increase the transparency and accountability of awarded funds. Increasing transparency and improving communication about critical joint federal/state programs is laudable. Eastern Plant Board members have participated with APHIS PPQ in past efforts to provide consistent work plans and Cooperative Agreement templates with this goal in mind. However, changing the Cooperative Agreement process can be disruptive to the very programs that they support. As such, changes to the process should include considerations for when the changes will be implemented, how the changes will be communicated, and how USDA staff will be trained and prepared to assist states through the process. Attention to these details minimize any unintended negative impacts to critical programs.

NASDA can use its unique role to reduce the negative consequences of Cooperative Agreement funding delays. NASDA can facilitate communication with USDA leadership to communicate that stakeholders

served by state programs benefit from timely funding of Cooperative Agreements. **The Eastern Plant Board respectfully requests that NASDA work with USDA leadership to ensure timely funding of Cooperative Agreements, both this year and in future years. The Eastern Plant Board respectfully requests that states, NASDA, and USDA work together in the future to ensure that administrative decisions about process are minimally disruptive to mission-critical programs.**

Sincerely,

Chris Logue, President, Eastern Plant Board

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