



## THE CENTRAL PLANT BOARD

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September 12, 2013

Osama El-Lissy, Deputy Administrator  
USDA-APHIS-PPQ  
Washington DC

Dear Osama,

The cooperative working relationship between state regulatory agencies and the USDA-APHIS-PPQ is vital for pest detection and response efforts. Many states lack the financial resources to carry out pest detection, control or eradication efforts without federal assistance. Likewise, USDA-APHIS-PPQ lacks manpower and relationships at the local level. The cooperative agreement process has been mutually beneficial to both state and federal agencies.

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

1. USDA-APHIS-PPQ recognize, acknowledge and support the efforts of the National Plant Board to promote consistency and uniformity in the administration of cooperative agreements.
2. Develop an online automated system for cooperative agreement administration.
3. Simplify, streamline and reduce repetitive, redundant, and unnecessary reporting and tracking requirements, and focus agreement oversight on program results and accomplishments, as opposed to detailed tasks.
4. Require only annual reporting, similar to the current process now utilized by the US Forest Service in their cooperative agreements.
5. Utilize one set of standard cooperative agreement language for the base articles that make up the majority of the agreements and have states sign off on them once a year. These are generally boiler plate and having agency leadership sign off on them with each agreement is unnecessary. Individual agreements would then be much more limited to the specific work being conducted.
6. Consider the development of a bundled block grant agreement that would allow states more flexibility to respond to local situations and needs, and also reduce administrative

burdens on both the states and USDA-APHIS-PPQ. Making this block grant concept annually renewable would allow for stable and consistent programs at the state level (as opposed to the current 1-year “yo-yo” funding) and allow for long-term planning.

7. Establish a defined timeframe during which reviews of workplans, financial plans, and reports must be completed by SPHDs and USDA-APHIS-PPQ Program Managers, and comments and requested edits provided to the state.
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 potential costs for unemployment and other costs that may not be immediately available prior to the expiration of the agreement.
9. Reimburse states the cost of responding to audits and the costs of requests for additional reports, maps, or data entry not included in the original coop agreement.

Both state and federal agencies are under legislative and citizen scrutiny to show fiscal responsibility and demonstrate good stewardship of tax dollars. This has led to greater proof of need, more detailed work plans, and increased reporting. While both state and federal agencies agree that wasteful spending should be eliminated, creating a process that rewards better agreement writing over substantive survey efforts, or alienates partners and damages the relationship between cooperators, is not desirable or beneficial to either party.

Sincerely,



Philip Marshall, President  
Central Plant Board

CC:

Rebecca Bech, Field Operations Associate Deputy Administrator, USDA-APHIS-PPQ

Paula Henstridge, Assistant Deputy Administrator, USDA-APHIS- PPQ

Matt Royer, Executive Director, Field Operations

Jason Hancock, Deputy Chief of Staff, USDA-APHIS-PPQ

Geir Friisoe, National Plant Board President

Carol Holko, Eastern Plant Board President

Mike Evans, Southern Plant Board President

Mitch Yergert, Western Plant Board President