

**Comments on NIFA FRDOC 0001  
Arizona Pest Management Center**

**Re: Notice of Intent to Extend Without Change a Currently Approved Information Collection.**

Docket: NIFA\_FRDOC\_0001

Date: October 19, 2020

[https://beta.regulations.gov/document/NIFA\\_FRDOC\\_0001-0146](https://beta.regulations.gov/document/NIFA_FRDOC_0001-0146)

## **Background**

The Arizona Pest Management Center (APMC) is host to the University of Arizona's expert integrated pest management (IPM) scientists including Ph.D. entomologists, weed scientists and plant pathologists with expertise in the strategic tactical use of pesticides within IPM programs that protect economic, environmental and human health interests of stakeholders and society at large. The APMC has a long-standing relationship with USDA-NIFA, as a regular recipient of Institutional Grants that provide foundational support for our Extension IPM programs. The current primary source for this support is the Extension Implementation Program (EIP) of the Crop Protection and Pest Management grant program. In addition, faculty and APMC staff are also frequent awardees in other USDA-NIFA grant programs. As recipients, we are responsible for providing annual progress reports and final reports during each grant cycle. For several years, all reporting has been done through USDA's reporting portal, REEport.

As IPM Program Manager and Associate Director of the Arizona Pest Management Center, I am responsible for reporting to NIFA on the Extension Implementation Program and other IPM-related projects. All reporting is through NIFA's online grant reporting portal, REEport. I am an entomologist and IPM Specialist with Ph.D. level training in program evaluation methods. I oversee the IPM Assessment at the Arizona Pest Management Center. In accordance with USDA's National Roadmap for Integrated Pest Management (USDA-NIFA 2018), we measure changes in stakeholder knowledge and behaviors, adoption of specific IPM practices, and the reduction of economic, human health and environmental risks associated with pests and their management. **It is these long-term outcomes that are of most interest in demonstrating the social value of IPM.** In order to sustain and potentially increase federal investments in IPM research, education and outreach, it is essential that these outcomes be measured, documented and communicated with the public and with policy makers. It is USDA-NIFA's responsibility to request and capture the best data possible from all funded grantees. Quality data focused on program outcomes can help demonstrate that federal dollars are well-spent, providing transparency to taxpayers. Without consistently documented outcomes of social, environmental and economic significance, it is difficult to argue for continued investments in these programs.

One challenge of the REEport system, according to a former USDA-NIFA National Program Leader, is the difficulty of summarizing data across individual grantees in order to evaluate the broad impacts of a national grant program. I was part of a "common measures" workgroup formed in 2017 by the Regional IPM Centers to help NIFA address this problem. Our specific

goal was to revise CPPM grant reporting requirements to facilitate the aggregation of project outputs and outcomes across states. Our mandate was to facilitate improved reporting within the existing framework of REEport. The solution we developed, implemented in 2020, is less than ideal. Language was added to reporting requirements, instructing CPPM grantees to provide summaries of certain activities (outputs) in the open-ended Accomplishments section of REEport (e.g., number of peer-reviewed and non-peer-reviewed publications, number of presentations, number of people reached, etc.). This added requirement will presumably make it easier for program leaders to sum numbers across individual projects. However, this approach still requires additional data manipulation on the part of NIFA personnel, since the summary numbers are lumped into a large open-ended text field with other information. The limitation of working within the existing framework of REEport precluded the idea of adding numeric fields to the database, which could have been summed across individual projects without the need for manual manipulation by NIFA personnel.

As our team worked on these “common measures” efforts, we learned of a revised reporting process that had been recently implemented by the USDA Sustainable Agricultural Research and Education (SARE) grant program. The SARE program now collects aggregable outcome data from grant recipients directly related to national SARE program goals. Statistics collected include the number of stakeholders that report changes in knowledge and skills; their intention to use new knowledge and skills; increases in profitability; and self-reported reductions in human health and environmental risks. My understanding is that in order to facilitate collection of these data, the SARE program implemented its own separate online reporting portal. Grantees report within this separate system, which enables recording of quantitative data through numeric database fields that are additive across separate funded projects. SARE program personnel can compile data as needed to complete required reporting within the REEport system. The SARE approach may have its own drawbacks, but it is superior in its inclusion of aggregable outcome data: number of stakeholders who improve knowledge and skills, adopt a practice, increase economic outcomes, etc. Perhaps the SARE online reporting system could be adapted to collect similar outcome data for the CCPM program. Before doing so, it would be important to assess the quality and usefulness of the outcome data so far accumulated by the SARE program, and the level of burden placed on grantees, and on SARE personnel through the use of dual reporting systems (their new system plus REEport).

## **Recommendations**

Comments are provided below on each of the points identified in the Federal Register notice.

### **(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility**

Yes, collection of the information is necessary to ensure accountability of grant programs to federal taxpayers. Furthermore, each grant program within USDA-NIFA that relies on the REEport system should carefully review grant reporting requirements to ensure that the

information collected is useful, *in that* it is **relevant to supporting the assessment of a project, relative to grant program objectives, priorities and expected outcomes**. Questions should be formulated to address and emphasize outcomes (what is learned, behavior change, changes that impact the system), not merely “activities” (products or outputs). Although both measures are useful, **only outcome-related data can determine progress toward achievement of grant program goals**.

**(b) the accuracy of the agency's estimate of the burden of the proposed collection of information including the validity of the methodology and assumptions used**

I can't speak to this except to note here that the math was incorrect in the Federal Register notice. 1 hour x 8,700 responses = 8,700 hours, not 870 hours.

**(c) ways to enhance the quality, utility and clarity of the information to be collected**

Currently, the Accomplishments section of REEport includes instructions which guide grantees on the importance of reporting outcomes in this open-ended section. The language and instructions are clear and helpful. However, a limitation is that this single open-ended field, limited to 8,000 characters, is the only section within REEport where outcome data can be reported. Because the Accomplishments section of REEport is an open-ended field, there is currently no automated way to sum aggregable data across reports from different grantees. Data from multiple reports must be manually examined and manipulated to achieve this, presumably at great investment of time by NIFA personnel.

**Aggregation is particularly important to assessment of the Extension Implementation Program, where NIFA awards roughly 50 proposals across states and territories each grant cycle.** Furthermore, the EIP program includes 13 different primary and secondary “priority areas,” only a subset of which each grantee addresses in their individual state projects. In order to assess achievement of national program goals, it is necessary for National Program Leaders to manually collate and summarize these data, ideally by priority area, in order to determine progress on goals as diverse as IPM in schools, IPM for pollinator health, and IPM in animal agriculture. A more efficient structure for the REEport database would be one that enables reporting of outcomes in a way which would allow NIFA program leaders to extract and sum IPM outcomes within Priority Areas across states. For example, perhaps the addition of “check boxes” to associate outcomes with specific Priority Areas would facilitate the summing of outcomes in ways that would provide greater resolution on program outcomes by Priority Area.

**It is important to emphasize that not all useful, reportable information is quantitative nor will it fit into a neat and tidy box.** In addition to capturing aggregable quantitative outcomes, such as “number of stakeholders increasing their knowledge,” it is critical that grantees retain the flexibility to share text-based information about program progress and outcomes. Sometimes it is the stories of individual stakeholders that produce the most compelling evidence of a

program's value. For example, stories demonstrating how IPM programs can reduce risks to public and environment health that can be shared with policy makers and the general public. Because "all IPM is local," it is important that grantees retain the flexibility to report the subtleties and nuances of their unique programs.

**Another limitation of the current reporting system is its lack of support for non-text-based information.** In Arizona, we often produce charts or other graphics that present program outcomes in concise and compelling ways. This information might be useful to USDA-NIFA for its own purpose of promoting IPM outcomes in its national newsletter or in communications with congress, OMB or others who may have a need for IPM outcome information in graphical form. This could include info-graphics or other concise ways of communicating IPM program outcomes to stakeholder.

**I also suggest the addition of a category under "Products" for "Extension Publications."** These types of publications tend to be numerous in our reports, and are relevant outputs for our programs, but currently we have to select "Other" as the product category, which results in Extension publications being lumped with other unrelated types of outputs. For the Extension Implementation Program, as for any integrated grant program that includes an Extension component, it would be useful for NIFA to be able to sum the number of Extension publications produced, as these tend to be focused directly on educational grant objectives targeting specific audiences.

**(d) ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology**

**I recommend the addition of an import function for the "Products" and "Other Products" fields of REEport, to reduce the reporting burden.** The Arizona Pest Management Center maintains its own database of "outputs" for our IPM Teams. If publications, presentations and other outputs could be input directly in the form of database files (RIS files or some other standard bibliographic format), this would save us a great deal of time individually adding sometimes upward of 100 individual project outputs into the REEport database for a single report.

Because currently all project outcome information must be entered into the Accomplishments field, **it would be useful if NIFA could increase the character limit from 8,000 characters to something a bit higher (e.g., 12,000).** In EIP, for example, we are typically reporting outcomes and impacts across four different priority areas. I often find I have to cut valid and worthwhile outcomes from the report, or selectively edit for length my original draft to fit within the character limit.

For each annual reporting cycle, I invest a great deal of time soliciting input from each of our IPM teams and develop our grant reports. The most time-consuming aspect of this work is in the compiling and summing of "outputs" such as publications, trainings, meetings, field days,

presentations, etc. I view these outputs as far less significant than the major program outcomes I would like to share with USDA-NIFA. I am not sure it matters whether we report 40 publications versus 20, though it takes twice as long to compile and enter the information. However, unless we are reporting outcomes—changes in what people know and what they practice, and the impacts those changes have economically, environmentally and on human health and well-being—we haven't provided evidence to NIFA of the social value of its investments. A reporting system that emphasizes outcomes over outputs would better serve NIFA, its grantees, and the general public.

I believe many of the points I have raised in these comments could be addressed through stakeholder-informed development of an improved reporting system that streamlines the reporting and aggregation of output, and which also accommodates improved reporting of program outcomes through some of the changes I've suggested.

Thank you for your consideration of these comments. Please feel free to contact me if you require further information.

Sincerely,

A handwritten signature in black ink that reads "Al Fournier". The signature is written in a cursive, flowing style with a long horizontal stroke extending from the end of the name.

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