October 14, 2020

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USDA

Regarding: Docket number 2020-17604, Notice of Intent To Extend Without Change a Currently Approved Information Collection

About us

The Western Integrated Pest Management Center works with stakeholders in the public and private sectors in the West to promote the development and adoption of integrated pest management (IPM) to solve pest problems. We gather information from the IPM network to provide federal agencies with information to assist the decision-making process. Our network includes comment coordinators in the Pacific Northwest, the arid southwest, the intermountain west, and the pacific island territories and Hawaii. Comments reflect the principles of integrated pest management.

Comments related to the REEPort reporting form

The audience for REEPort information includes administrators at USDA and members of Congress who are interested in the Return-On-Investment (ROI) of NIFA funded projects. The information must illustrate how NIFA funded projects are making a difference in the health of people and the environment, and improving the lives of Americans by improving their economic situation. In addition, the REEPort and NIFA reporting requirements should not place an undue reporting burden on project directors and other recipients of federal funding through NIFA.

Currently, opportunities to report project outcomes in REEPort consist of unstructured text boxes with some restrictions on length. Project directors provide a narrative about project outputs and impacts. It would appear that this narrative style format is used to capture impacts from the large variety of different project types (OREI, AFRI, CPPM, Methyl Bromide Replacement, and others) that must report into REEPort. Allowing project directors to self-identify their impacts maximizes the likelihood that all possible impacts will be captured. But this structure also leads to large volumes of qualitative data and unstructured information in REEPort. The ROI question often requires administrators to search through the qualitative date to pull out the quantitative information that can then be used for analysis in answering the ROI question. In addition, few project directors are practiced in the art of impact analysis and so provide data that is of limited use for documenting project impacts including knowledge, behavior and condition changes. The lack of structure in REEPort combined with project directors that have limited experience with impact assessment leads to a time-consuming task for USDA administrators of filtering through qualitative data to compile quantitative impact results. It also leads to a larger investment of time on the part of project directors who must develop a narrative about project impacts.

Administrators and National Program Leaders at NIFA have attempted to structure the narrative data in REEPort by providing detailed instructions to project directors about the kinds of information that should be included in the open-ended text fields. For example, REEPort requests information about what was accomplished under the project goals. The instructions provided for the Crop Protection and

Pest Management Program (CPPM) indicate that the "... accomplishment section should report the accomplishments, outcomes, and impacts of your project during this reporting period that will provide benefits to broad audiences." NIFA recommends that project directors specifically list the following quantitative data: total numbers of peer-reviewed and non-peer publications, total number of presentations, and total number of people reached. Providing detailed instructions does provide guidance about specific information that should be included, it does little to reduce the burden on administrators at NIFA to comb through the text fields to find the needed information.

In line with efforts at NIFA, it is the opinion of those at the Western IPM Center that additional structure in the REEPort system might have significant benefits by: 1) providing NIFA with better information about impacts and ROI, 2) allowing for the aggregation of information across programs, and 3) reducing the reporting burden on project directors. But how should additional structure be imposed on the REEPort system.

Functionally, there are probably many ways to add additional structure in REEPort, but here we identify two. First, specific questions could be included as a series of single line text entries. This first solution puts the burden of the change on NIFA staff and administrators and may be restrictive. The second solution puts the burden of the change on project directors who input information into the system. This second solution would involve the use of tags to identify specific types of outputs and outcomes in the narrative reports. The tags have the additional benefit of allowing administrators and national program leaders to link specific outputs and outcomes to specific project objectives.

Here we have provided some examples of specific questions that could be added to REEPort or tags that could be added in the REEPort narrative to help identify and aggregate the information necessary to address the question of ROI. Some of the questions below were adapted from the Sustainable Agriculture Research and Extension (SARE) program impact assessment tool, available at western.sare.org/Grants/Documents-for-Managing-a-Grant/#survey. The SARE survey tool allows the program to accumulate impacts across different projects and demonstrate knowledge changes and intent to change behaviors.

The specific questions focused on outputs could include total numbers of peer-reviewed and non-peer publications (#totPubs), total number of presentations(#totPresent), and total number of people reached (#totPeopleReached).

The specific questions focused on outcomes could include:
- Number of stakeholders that report changes in knowledge, skills and aptitude as a result of Extension and outreach activities of the project (#deltaKSA)
- Number of stakeholders who intend to use the new knowledge and skills (#possibleAdoption)
- Number of stakeholders who intend to share the information with others (#multiplier)
- Stakeholders report increased profitability following use of the new practice (#increaseProfit)
- Environmental health risks are reduced following adoption of the new practice (#increaseEnvironHealth)
- Human health risks are reduced following adoption of the new practice (#increaseHumanHealth)

Finally, improvements in machine learning and artificial intelligence may help to solve the problem of aggregating information across projects reporting into REEPort. But this solution may still be in development and therefore the timeline to implementation too long or unknown. Regardless, the addition of artificial intelligence could work in concert with the use of tags within the narrative.

Please feel free to contact me if you have any questions or concerns about this comment.

Sincerely,

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