

The Precarious State of the Pesticide Safety Education Program
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I. Background on the Pesticide Safety Education Program

Starting in 1965, federal funds have been provided to support what is now called the Pesticide Safety Education Program (PSEP) and its coordinators at state land grant colleges and universities. The goals of pesticide safety education and applicator certification remain largely unchanged – the safety of applicators, other workers, and the general public, the protection of the environment, and the proper use and security of pesticides. The educational focus to achieve those goals has expanded significantly over time (e.g. spray drift minimization, endangered species, resistance management).

The federal PSEP funds originally targeted the incorporation of pesticide personal safety and environmental protection topics into the USDA Cooperative Extension Service pest management education. Starting in the 1970s, the federal PSEP funds focused on education for certified applicators (who had access to restricted-use pesticides). Today, due to state regulations, the realm of the certified applicator goes well beyond the restricted-use pesticide applicator. In many states, there is considerable effort focusing on non-occupational pesticide users/uses as well (Master Gardeners, IPM in Schools, etc.).

University-based extension pesticide education is conducted directly by PSEP staff or networked out to county agents and university specialists. In 2010, the state lead agencies reported that there were 488,000 certified private applicators and 405,000 certified commercial applicators holding credentials, including 105,000 newly certified applicators and 227,000 applicators participating in recertification programs in the states (<http://cpard.wsu.edu/reports/totalApplicators.aspx>¹). Additionally, based on USDA reports, PSEP provides education to 1.1 million other pesticide users (using non-EPA funds).

PSEP funding originally came from congressional appropriations to USDA and, beginning in the early 1970s, from the newly created EPA via an EPA/USDA inter-agency agreement. Since 1975, when EPA first began providing these “pass-through” funds to USDA, the annual amount has varied from \$5 million to under \$1 million. USDA supported PSEP by funding a National Program Leader, taking no overhead expenses to manage the EPA “pass-through” funds, and providing other in-kind support. The PSEP funds have always been discretionary and not related to the grants provided to states and tribes for regulatory programs.

Beginning in FY 2008 and going through FY 2012, the Pesticide Registration Improvement Renewal Act (PRIA II) specifically earmarks \$500,000 annually from company pesticide registration fees to be dedicated for PSEPs. Unfortunately, PRIA II funds have not resulted in additional resources for PSEPs but have only compensated for some of the diminishing levels of EPA discretionary funding (see table below).

Federal Funding for the Pesticide Safety Education Program (PSEP)

Year	EPA Discretionary	PRIA II	Total
	----- Funding -----		
FY 2000	\$1,900,000	n/a	\$1,900,000
FY 2004	\$1,200,000	n/a	\$1,200,000
FY 2005	\$1,200,000	n/a	\$1,200,000
FY 2006	\$1,200,000	n/a	\$1,200,000
FY 2007	\$1,200,000	n/a	\$1,200,000
FY 2008	\$1,200,000	\$500,000	\$1,700,000
FY 2009	\$1,100,000	\$500,000	\$1,600,000
FY 2010	\$800,000	\$500,000	\$1,300,000
FY 2011	\$0	\$500,000	\$500,000

(<http://www.csrees.usda.gov/business/awards/formula/smithlever.html> ²)

Due to budget constraints, complicated accounting, and a variety of other challenges over the years, there have been significant shortfalls and deferrals in the amounts made available to PSEPs, which ultimately caused EPA to eliminate the discretionary PSEP funding and support it only at the PRIA II funding level for FY 2011. If PRIA funding is not renewed by Congress, federal PSEP funding has a good chance to go to zero starting in the FY 2013.

For FY 2011, all except a few states and territories will receive \$10,000 (to be distributed in the fall of 2011). This amounts to a one-year reduction of 20 to 75% to each state, and up to an 83% reduction compared to FY 2008 funding levels. Previously, funding was distributed by a formula that included base funds and was pro-rated based on the number of certified applicators.

In almost all states, PSEPs also face significantly reduced funding for extension, which provides basic services to support the program (accounting, human resources, IT support, travel, professional development, etc.) Thus, for the first time (FY 2011), universities and colleges will be able to levy overhead or indirect charges against the PSEP funding, reducing the available PSEP funds up to 59%, depending on the institution's policy. At the same time, state extension services are reducing both state faculty positions and field educator positions critical for the development of PSEP educational content and program delivery.

In reality, the quality of the Pesticide Safety Education Program is being impacted by the funding challenges of a group of associated entities that are critical to synergizing its impacts – the State Lead Agencies that enforce the law, the universities that provide “indirect” support, the state extension services that develop PSEP educational content and deliver the program, and the county agent system that maintains a county-level

presence for anyone (rural or urban) who has questions relative to pesticide use, safety, and stewardship.

II. Funding Sources for the Pesticide Safety Education Program

Today, PSEP coordinators fund their programs in different ways. Some have worked aggressively to become self-supporting, while some lack the infrastructure, administrative support, and/or legal capability to pursue all funding avenues. Lack of sustainability has directly resulted in decreased staff, reduced pesticide manual production, reduced educational offerings, realignment to other non-PSEP educational work and more time spent writing grants and contracts to maintain PSEP programs. States with small numbers of applicators have been disproportionately hit with reductions in base funding. In some cases, competing and conflicting interests of state stakeholder groups has prevented legislative passage of changes to remedy the situation.

PSEPs are now funded in a diversity of ways, but not all may have the opportunity to gain support this way. Funding mechanisms include:

- ✓ Direct funding from State Lead Agencies or other state public dollars, usually in the form of contracts or grants.
- ✓ State or university dollars for the coordinator's salary and benefits.
- ✓ User fees from applicator training, manuals, educational materials, on-line programs, printing, shipping, examinations, certification, etc. These fees may be charged not only to applicators but to other educators in the public or private sector who want to use or modify them for pesticide safety education (hence the copyrighting of some extension materials). This mechanism does provide 100% funding of several PSEP programs, including all staffing and operational dollars.
- ✓ State pesticide fines routed to PSEP.
- ✓ Competitive contracts and grants (those that do not shift the focus away from pesticide safety education).

Other funding support mechanisms, practiced to varying degrees, include:

- ✓ Support from a 5-year, 2010-2015 EPA cooperative agreement to the National Association of State Departments of Agriculture Research Foundation (NASDARF) for pesticide worker safety programs.
- ✓ Gifts and or endowments.
- ✓ Private companies to fill niches in certain industries.
- ✓ Fees for other specialized services such as consulting, lectures, Worker Protection Standard training, train-the-trainer, sprayer tune-up and pattern testing clinics, pesticide safety auditing, and closed training for specific groups.
- ✓ Partial or full payment of actual expenses associated with developing and/or delivering educational programs, events, or training resources by associations, commodity groups, trade organizations, and private firms. In exchange for this, the sponsoring group receives some recognition. Historically, state agencies and

Cooperative Extension have been concerned about conflicts of interest, but with education being the interest, many entities have changed their view of partnerships and sponsorships.

III. Current Reach of the Pesticide Safety Education Program

The state-specific nature of PSEP program obligations, administration, and funding directly impact the ability of a PSEP to adapt to declines in federal and state public funding. Almost all state legislatures, some far more than others, have passed into law a wide range of pesticide regulations that increase the numbers of certified applicators well beyond the number required to be certified for use of federally restricted use pesticides (RUP). For example, a state may restrict certain active ingredients based on specific concerns (e.g. groundwater, aquatic organisms), thus requiring certification for purchase and use. The type of employment also may trigger the requirement to be certified – including commercial ‘for hire’ applicators, public agency personnel, and more. Each of these additional non-RUP certified applicators places a greater responsibility on PSEP.

IV. Other Responsibilities Added to PSEP Coordinators’ Workload

Each state PSEP is placed in a different network of extension programs, and thus PSEP coordinators and staff have a wide diversity of roles and responsibilities when compared across state lines. For example:

- ✓ A state PSEP may stand alone or may be an integral part of extension’s IPM program, environmental or health related program, or crop or structural pest program.
- ✓ PSEP coordinators and staff may have other responsibilities, such as the Worker Protection Standard, Master Gardeners, School IPM, environmental programs, NPDN First Detector programs, invasive species, health and safety, non-PSEP related crop and other pest management extension work, etc.
- ✓ PSEP faculty and staff may be teaching undergraduate or graduate-level classes, run research programs, and be involved in a wide range of other non-PSEP responsibilities through their college.

PSEP coordinators are a diverse group. Some are tenured or tenure-track faculty members, while many others are professional academics whose positions are secured only as long as their PSEP funding continues.

An unfortunate business tactic also works against the PSEP. When a PSEP coordinator retires or leaves, all too often the PSEP becomes folded into a larger program area and loses its focus on pesticide safety education – the budget and capacity are then reduced to a nonsustainable level. PSEP is in the middle of a large wave of Coordinator retirements.

V. Going Forward

New funding support mechanisms potentially exist for the Pesticide Safety Education Program. For example:

- ✓ Changes in policies, rules, regulations, or statutes to better support funding. For example, most states currently direct fines for enforcement actions into their respective general funds, rather than to support PSEPs.
- ✓ Grants from nontraditional sources such as pesticide companies, commodity groups, government entities other than EPA and USDA, conservation groups, and other non-government organizations with an interest in pesticide safety education.
- ✓ Additional allocations from federal and state product registration fees. EPA, the US Farm Bill, and state legislatures determine these allocations. Increasing these allocations and prioritizing their use will require a well-organized and thoughtful engagement of federal and state governments by key stakeholders.
- ✓ Caps on overhead taken by states (or new funding mechanisms that reduce overhead).
- ✓ Multi-stakeholder integration into PSEP, such as commitment by industry and agricultural/structural interests to cost-share an educator's time.

There also needs to be a new way of *thinking* about pesticide safety education. Some educators (public and private) are already there, but others are not.

- ✓ State pesticide safety education programs need to embrace national, regional, and other collaborative educational initiatives that further the goals of pesticide safety education and eliminate redundant efforts, while preserving the integrity of any state-specific education.
- ✓ There should be no stigma attached to having any organization's logo on general pesticide safety education materials. A logo should not be considered an "advertisement" of that organization or its products, if the content relates to pesticide safety education involving all pesticides or multiple pesticides that share a common concern.
- ✓ The federal government and ALL state governments need to maintain a strong interest in and acknowledgment of the importance of pesticide safety education. All entities could do pesticide safety and stewardship education a great service by not downplaying the use and importance of pesticides with vague and/or incorrect directives like "choose the least toxic pesticide" or "use pesticides as a last resort."

There is no one solution to the increasingly precarious state of the Pesticide Safety Education Program. A simpler federal accounting system will not create new funding nor eliminate indirect charges.

PRIA funding must be renewed and increased; in addition, permanent funding must be established to provide a stable source of support for pesticide safety education. Setting priorities for the use of that funding will be critical, as well as requiring efficiency in developing non-redundant educational materials for the proper audience – national or otherwise. State-specific pesticide safety education must be preserved where needed but must be funded within the state.

PSEPs should be high-priority, high-profile programs in every state, with adequate funding and support to impact all pesticide users. Stakeholders beyond the formal PSEPs must share responsibility for the development and distribution of educational materials through various media, and PSEPs should welcome their role. The crop protection industry, through individual company activities and organizations like CropLife America, is engaged in many ongoing stewardship activities. However, it is clear that much more needs to be done by industry in support of pesticide safety education.

A grass-roots effort must be undertaken by key stakeholders in each state to overcome policy and regulatory impediments to having a sustainable pesticide safety education program. Stakeholders must consider the successful strategies being used in other states. Being public servants, university and state lead agencies cannot take the lead in requesting change. Instead, change must be driven by grower groups, industry, and others within the states and at the national level. Pesticide use continues to flourish – pesticide safety education must keep pace.

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¹CPARD Report: Number of Applicators (NASDA Research Foundation Certification Plan and Reporting Database). 2010.
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