

US EPA ARCHIVE DOCUMENT

Ray,

Thank you for the thoughtful feedback on the survey tool. If one takes the “flaws” you iterated and renames them concerns, I agree with you that they are important components in continued discussions of streamlined WDL. Everyone needs to make sure that we guard against hasty decision-making, black-box analyses, and biases in approach. We may ultimately agree to disagree about the specifics of this particular survey, however I very much support your concerns in the overall picture.

I think it’s important for everyone to understand my role and AAPSE’s role regarding the survey, so that some misunderstandings can be laid to rest. We volunteered to devise a survey tool and manage the data collection because, as educators, we are seen as impartial. Neither I nor AAPSE have taken a position on whether streamlined WDL would be a “good” or “bad” thing overall. We are very curious about what the applicator community thinks about the concept and want them to have a number of opportunities to provide input in this discussion.

The AAPSE-WDL committee would be the first to assure you that this was intended to be a “first-cut” survey tool, meaning that it’s deliberately short, does not seek much in-depth information, and will be open during a relatively short period of time. We expect the resulting data only to indicate general trends or opinions among those who participate, we will **not** interpret the data as any kind of permanent binding vote on behalf of all agricultural applicators. While we hope to receive enough data to make the survey statistically valid, we cannot guarantee that since applicators self-select whether to participate in the survey or not. In addition to a final analysis, we plan on providing the data itself so that anyone may run statistical analyses.

My opinion is that if EPA wants to continue streamlined WDL discussions, it would be VERY useful to survey other entities (i.e. state lead agencies, registrants, label providers, etc.) in addition to applicators, and to do so a number of times at different stages of the project. One survey at one time to one group is not enough. My impression, from hearing Bill Jordan talk yesterday at the PPDC-WDL workgroup teleconference, is that EPA understands this and agrees that this survey is only a preliminary look at applicator attitudes. However, I’ll continue to push this approach at future PPDC-WDL workgroup meetings.

You listed some specific concerns that I’d like to address, although I’m not taking them specifically in the order in which you mentioned them.

- Institutional Review Boards (IRB) don’t require that studies provide statistically valid research. Their concern is that human subjects are treated in a clear and respectful manner, they are informed in advance about any risks from participation, their participation is entirely voluntary, and vulnerable populations (e.g. children, pregnant women, convicts, and mentally-disabled persons) are given additional oversight and protection through a more stringent review/approval process of survey tools.

- It's difficult for me to understand which survey questions you feel would be more appropriate than those we used without being given examples. I do agree that composing questions that get to the heart of a complicated subject is difficult.
- The draft survey tool was emailed to the PPDC-WDL workgroup on Nov 15th. That email is attached for reference. Although this period did include the Thanksgiving holiday, I believe this was sufficient to collect comment. My belief is based on receiving comment and/or questions from the Agricultural Retailers Association, the National Pest Management Association, representatives of AAPCO/SFIREG, Greenbook and Wilbur Ellis.
- I will be happy to share any comments or conclusions from IRB review. We are not seeking to hide anything in this process.
- Questions on the "promotional campaign" terminology should be addressed to Carol Ramsay and EPA as that is a separate effort from the survey, and one in which I did not participate. To be clear however, I believe that everyone interested in this topic should put effort into outreach so that the maximum number of applicators are exposed to the concept and encouraged to evaluate the Virtual Pilot then submit comment via the survey. The choice of which outreach materials to use should be open.

Although no one has asked this question it's important that everyone know that EPA was provided with a copy of the survey (Nov 15th) but did not provide comment nor did they participate in any way in survey development.

At the PPDC-WDL workgroup meeting, there was a statement made that "streamlined WDL" was a biased term, leading users to conclude that this concept would inherently be better than other options. I won't argue whether the term is biased or not because as survey manager I don't have any authority in creating the name used to describe the concept. My role is simply to devise a survey tool that will ask applicators how they feel about the concept itself. I believe the workgroup has discussed this in earlier meetings because the term was coined very early on; it was not created just for the purpose of the survey. That being said, I would encourage you to raise this topic at a future PPDC-WDL meeting, or, if the data leads EPA to continue discussion of streamlined WDL, to include questions in a future survey asking respondents whether they feel the term unfairly "markets" a concept which does not deliver on the promise.

I was unaware that registrant companies do not want their labels used in the pilot project, so I thank you for sharing that news although ultimately it has no bearing on the survey itself. Survey-takers will self-select the labels they want to view among the choices offered by the Virtual Pilot. It will be up to others to decide which labels are included in the Virtual Pilot.

Thank you again for offering feedback. While we don't see eye to eye on this survey, I nonetheless value your input.

Regards,

Catherine

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From: Ray McAllister [<mailto:RMcAllister@croplifeamerica.org>]
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Subject: WDL survey

Catherine:

I would offer the following feedback on the planned survey of the pilot project. This does not represent a comprehensive review, as there has not been not time or adequate opportunity for that. Instead we have focused on broader issues with the survey. We feel they are serious flaws in both the survey questions and the approach to evaluation.

Furthermore, we have expressed to Greenbook and to EPA the insistence of registrant companies that their product labels not be used in the pilot project without the express approval of the various individual registrants. We have discovered significant omissions in the "streamlined" labels that are extracted by the WDL pilot project.

These are strong arguments for not pursuing the pilot project, the outreach, or the survey at this time.

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Flaws in the survey and evaluation procedure:

- Leading (and misleading) questions, introducing bias.
- Lack of other, more appropriate questions.
- Lack of important, appropriate choices for specific questions.
- Response cohort would be self-selected, likely to be biased toward acceptance.
- Lack of quantitative statistical plan and approach for evaluation of results.
- Promotional “campaign” nature of outreach to applicators, introducing more bias.
- If this “human study” doesn’t provide statistically valid data to support a regulatory decision, is it “ethical”? How does the IRB address this question?
- Lack of involvement of applicators or registrants in development of the survey. “Closed” committee that developed the survey. Essentially no time to provide input to the survey.
- Development of the survey, including IRB review, should be an open, transparent process.
- Rush to meet an artificial deadline skips much of “due diligence” in creating an appropriate survey instrument.