



New York State Office of the State Comptroller
Thomas P. DiNapoli

Division of State Government Accountability

Oversight of the Pesticide Reporting Law

Department of Environmental Conservation



Report 2017-S-57

November 2018

Executive Summary

Purpose

To determine the accuracy and completeness of the Department of Environmental Conservation's (Department) pesticide reporting database from self-reported information received under the Pesticide Reporting Law for the period January 1, 2013 through December 31, 2015, and to determine the status of the Department's efforts to implement an in-house database and web-based portal through April 24, 2018.

Background

The Department's Division of Materials Management is responsible for administering the Pesticide Reporting Law (PRL), which was enacted in June 1996. The PRL requires every certified commercial pesticide applicator, certified commercial pesticide technician, and commercial permit holder (including importers, manufacturers, and compounders of pesticides) to report regulated pesticide sales and use occurring each calendar year to the Department. The report is due by February 1 of the year following the calendar year for which the report is being submitted.

The PRL amended the Environmental Conservation Law (ECL) and Public Health Law to provide for the compiling of pesticide sales and use data that would be useful and applicable to human health issues and research, such as cancer research and education. It also makes the compiled data available to the public in aggregate form. The Department of Health's (DOH) Health Research Science Board (HRSB) considers requests for confidential information from the PRL database for purposes of health-related research projects.

The Department, in cooperation with Cornell University (Cornell), operates the pesticides sales and application database. Each year, the Department and Cornell receive data covering more than 7 million pesticide applications and roughly 6,000 pesticide sales transactions, of which, for 2013, approximately 85 percent were submitted electronically and 15 percent were submitted on paper or on data storage media, such as floppy disks or compact discs. The electronic submissions are entered directly into the database. The Department reviews paper submissions for legibility and submits them to a data entry vendor to be converted to an electronic file for inclusion in the database. In total, for calendar years 2013, 2014, and 2015, the PRL database contained 22,404,145 application records and 18,068 sales records. Cornell subjects the electronic data and the converted paper and media data to two validation steps, which are designed to identify errors in the data and have identified many errors to date. The Department has a staff person who investigates and corrects errors.

Key Findings

- Our tests of samples of pesticide application and sales data entries, as well as corrected error reports, found that they were reasonably accurate based on the certified applicators' and sellers' self-reported data. However, there are some inaccuracies in the database. Although the data system has controls to identify errors, reports with low rates of errors are entered into the database without being corrected. While the Department attempts to fix as many as possible, many remain in the database uncorrected. For example, for calendar year 2013 (the

most recent year of Department-verified data), 81,176 of the 259,705 errors identified were not corrected due to limited resources. Also, the data is self-reported to the Department, but the Department is not required to verify the accuracy of the information and does not do so. The Department, Cornell, and the HRSB are aware of these limitations and caution potential users about the accuracy of the data. Department officials responded that they prioritize error corrections, giving higher priority to those that may have more significant impact on the quantities reported.

- We found that the Department began the process of migrating the PRL database to its systems. Department officials told us they are working on the transition with the Office of Information Technology Services (OITS). According to OITS officials, the procurement process for this work will not begin until at least 2019 or 2020.
- We also found that the PRL data is being used to make aggregate pesticide sales and use data available to the public, but is not being used for research in the area of human health, as the ECL intended. According to the HRSB, researchers do not request access to the PRL database because correlating pesticides with human health issues (e.g., breast cancer) requires exposure data, such as blood and tissue samples, rather than locations of applications. However, the Department, the HRSB, and Cornell indicate that the data has value for alternative purposes, such as developing pest control strategies and monitoring the impact of pesticides on ground water quality. We believe Department officials, DOH, and State policy makers should assess whether the limited usefulness of the PRL data warrants any actions to help ensure the data can be better utilized as originally envisioned in the PRL.

Key Recommendations

- Work collaboratively with OITS to improve the PRL database reporting system, including, but not limited to, increasing efficiencies for identifying and correcting errors to improve the accuracy and timeliness of the data reported on the website.
- Collaborate with OITS during the PRL migration to develop and implement an effective process to ensure that all reports received from registered applicators and sellers are entered into the Department's pesticide systems.

Other Related Audits/Reports of Interest

[Department of Environmental Conservation: Drug Management and Disposal \(2016-S-82\)](#)

[Department of Health/Office of Parks, Recreation and Historic Preservation/Department of Environmental Conservation: Oversight of Health and Safety Regulations at Public Pools, Beaches, and Spray Grounds \(2016-S-55\)](#)

State of New York
Office of the State Comptroller

Division of State Government Accountability

November 29, 2018

Mr. Basil Seggos
Commissioner
Department of Environmental Conservation
625 Broadway
Albany, NY 12233-0001

Dear Mr. Seggos:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is our audit report entitled *Oversight of the Pesticide Reporting Law*. The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

This audit's results are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

Office of the State Comptroller
Division of State Government Accountability

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Background

The Pesticide Reporting Law (PRL), enacted in June 1996, requires the Department of Environmental Conservation (Department) to collect and compile pesticide data annually. The Department's Division of Materials Management (Division), through the Bureau of Pest Management, administers and oversees the PRL. The Division's mission is to ensure safe and appropriate management of pesticides, and provide protection from exposure to them, through regulation of pesticide registration, sales, and application and related enforcement/compliance as well as technical assistance and outreach. Article 33 of the Environmental Conservation Law (ECL) specifically references the reporting of pesticides and the jurisdiction and regulatory responsibility of the Department in all matters pertaining to the distribution, sale, use, and transportation of pesticides and the requirement for reporting pesticide applications and sales.

According to the Department, pesticides for the control of insects, fungi, weeds, nematodes, and plant regulators, when properly used, are valuable, important, and necessary to the welfare, health, and economic well-being of the people of this State. However, such materials, if improperly used, may be detrimental to health, property, and wildlife. To provide data on the use of pesticides, the PRL requires every certified commercial pesticide applicator, certified commercial pesticide technician, and commercial permit holder (including importers, manufacturers, and compounders of pesticides) to report regulated pesticide sales or uses occurring each calendar year to the Department. However, the PRL database does not capture pesticide products purchased and applied by homeowners and some unrestricted pesticides applied by commercial/agricultural property owners. The reports must be submitted no later than February 1 of the year following the calendar year for which the report is being submitted.

The Department's PRL database contains millions of records of pesticide applications made by certified applicators or technicians and thousands of records of sales and resales of restricted-use pesticides. The following examples illustrate the differences between the two:

- A landscaping company applied a pesticide on a homeowner's lawn: captured as a record of a pesticide application.
- A pesticide applicator is contracted to treat the fields belonging to, or leased by, a local farmer: captured as a record of a pesticide application.
- A commercial permittee (e.g., seller of a restricted-use pesticide) makes a sale directly to a local farmer for use in the farmer's own, or leased, fields: captured as a record of a sale by a commercial permittee.
- A commercial permittee makes a sale directly to another reseller of restricted-use pesticide: captured as a record of a sale by a commercial permittee.

The records of the pesticide applications include: the EPA registration number, product name, quantity used, and date and location of application by address with five-digit ZIP code. Likewise, records of pesticide sales include: the EPA registration number, container size, location of intended application, and number of containers sold. The pesticide annual report data is available to health researchers and the public; however, the public is only afforded access to data that is aggregated

by zip code, county code, and statewide totals without specific address or applicator detail. The Department of Health's (DOH) Health Research Science Board (HRSB) solicits and reviews applications for research projects primarily focusing on the causes of various human health issues, such as breast and testicular cancer, which may require access to the more detailed PRL data.

Each year, the Department notifies, via letters and emails, the approximately 17,000 pesticide applicators and sellers that are required to report that their annual reports are due by February 1. The Department encourages electronic reporting of pesticide data, which it believes is the more convenient, cost-effective, and accurate method of reporting. The Department accepts reports up until a final deadline it establishes each calendar year without penalty, which for calendar year 2016 was April 24, 2017. Applicators and sellers that don't report by the deadline date are fined \$250. Department officials stated that about 600 applicators and sellers fail to report each year. For the applicators and sellers that fail to report, the Department flags their license in the New York State Pesticide Administration Database (NYSPAD), and they cannot renew it until the fine is paid and the report is submitted.

The Department contracts with Cornell University (Cornell) to operate the PRL database, which was developed by the Department in conjunction with Cornell. Cornell employs two staff members and a part-time consultant who are dedicated to the operation of the PRL database. These staff are responsible for ensuring that reports received are entered into the PRL database. In total, for calendar years 2013, 2014, and 2015, the PRL database contained 22,404,145 pesticide application records and 18,068 pesticide sales records. For 2013, approximately 85 percent of the reports were submitted electronically; the remaining 15 percent were submitted on paper or on data storage media mailed to the Department.

The Department reviews paper reports for legibility, and then sends the paper and media reports to a contractor for conversion to an electronic file. Once this is completed, the contractor submits the electronic files to Cornell for inclusion in the PRL database. Reports received electronically are submitted directly to Cornell and are entered directly into the PRL database. As this information is processed by Cornell, it is subjected to two data validation steps: one at the beginning of the process and one at the end of the process. Initially, Cornell's software analyzes the reports for errors by running a series of error checks. For example, the software identifies zip codes and county codes that do not match, unit type errors (e.g., liquids instead of solids, same amounts as prior year, errors in codes), and other report discrepancies. A report can contain numerous records (rows of data), which represent separate applications or sales of pesticides. Each record contains multiple data fields and, therefore, may contain multiple errors.

As of December 2017, the most recent Department-verified data on Cornell's Pesticide Sales and Use Reporting website was from 2013, representing a three-year lag for Cornell and the Department to process and post the data to the website. This is an improvement over the eight-year lag that was indicated at the June 5, 2014 New York State Assembly hearing. During our audit, the Department posted preliminary data for 2014, 2015, and 2016 on its website with the caveat that such data has not been through its verification process.

For 2013, 16,630 pesticide reporters submitted reports that contained approximately 7.3 million

records. Of these, more than 6.2 million were submitted electronically and 1.1 million were mailed to the Department on paper or on data storage media.

As of February 2017, the Department employed one full-time staff member to collect and review the PRL data, including fielding phone calls, responding to questions, and reviewing reports for legibility and completeness from about 17,000 required reporters. This person is also dedicated to investigate and correct as many errors as possible out of roughly 260,000 errors identified annually. During peak periods, another staff person helps on a part-time basis.

The Department's estimated costs for collecting and retaining the PRL data for the period January 1, 2013 through October 30, 2017 totaled approximately \$3 million, including \$1.4 million for Cornell, \$860,000 for the Department, and \$740,000 for the data conversion contract.

Audit Findings and Recommendations

Our tests of samples of pesticide application and sales data entries, as well as corrected error reports, found that they were reasonably accurate based on the certified applicators' and sellers' self-reported data. Despite these positive results, there are some inaccuracies in the database. Although the data system has controls to identify errors, reports with low rates of errors are entered into the database without being corrected. While the Department attempts to fix as many errors as possible, many remain in the database uncorrected. For example, for calendar year 2013 (the most recent year of Department-verified data), 81,176 of the 259,705 errors identified were not corrected due to limited resources. Also, the data is self-reported to the Department, but the Department is not required to verify the accuracy of the information and does not do so. The Department, Cornell, and the HRSB are aware of these limitations and caution users about the accuracy of the data. Department officials responded that they prioritize error corrections, giving higher priority to those that may have more significant impact on the quantities reported.

We found that the Department began the process of migrating the PRL database to its systems. Department officials told us they are working with the Office of Information Technology Services (OITS) on the transition. According to OITS officials, the procurement process for this work will not begin until 2019 or 2020.

We also found that the PRL data is being used to make aggregate pesticide sales and use data available to the public but is not being used for the purpose of research in the areas of human health, as intended by the PRL. According to the HRSB, researchers do not request access to the PRL database because correlating pesticides with human health issues (e.g., breast cancer) requires exposure data such as blood and tissue samples rather than locations of applications. However, the Department, the HRSB, and Cornell indicate that the data has value for alternative purposes such as developing pest control strategies and monitoring the impact of pesticides on ground water quality. We believe Department officials, DOH, and State policy makers should assess whether the limited usefulness of the PRL data warrants any actions to help ensure the data can be better utilized as originally envisioned in the PRL.

Accuracy and Completeness of PRL Data

We tested statistical samples of the reports from pesticide applicators and sellers to determine accuracy of data entry into the database. We found that they are accurately entered into the database consistent with the PRL. Likewise, our tests of the process to correct reports with errors found that the corrected versions were entered into the database accurately. Also, our test to determine if all registered applicators' and sellers' reports were included in the PRL database for calendar years 2013 through 2015 found the reports were contained in the database.

Despite these positive results, there are limitations to the accuracy of the database, which the Department, Cornell, and the HRSB have identified, and they caution users about the accuracy of the data. The data system has controls to identify and correct errors. Reports with error rates of 10 percent or greater or more than 100 errors for high-volume reports are to be returned to the submitter for correction.

However, reports with lower error rates of less than 10 percent of the data fields submitted (or fewer than 100 errors for reports with a higher volume of entries) are entered into the PRL database. While the Department attempts to fix as many as possible, many remain in the database uncorrected. Only one staff person is assigned to follow up on the errors and correct as many as possible. Those corrected are sent back to Cornell and are entered into the PRL. Of the 259,705 errors identified for calendar year 2013 (the most recent year of Department-verified data), the Department corrected 178,529. However, the 81,176 remaining errors were not corrected and were entered into the database as is. Since not all of the errors are remedied, neither the Department nor Cornell attests to the accuracy of the PRL database. Furthermore, both entities provide a statement on their website indicating such concerns. Department officials responded that they prioritize error corrections, giving higher priority to those that may have more significant impact on the quantities reported. Officials also noted there has been a downward trend in the number of errors since 2014. Our testing of Department-verified data for error correction was limited to calendar year 2013, the most recent year available at the time of our fieldwork.

Another limitation is that the pesticide application and sales information is self-reported to the Department. Although the data is subject to analytical controls to identify obvious errors or questionable information, it is not subject to any testing to applicator or seller records. Therefore, there is a risk that errors or omissions could occur without detection. However, the Department is not required to verify the accuracy of the information and does not do so.

We found that the Department does not periodically determine if all the reports that were submitted by registered applicators and sellers are eventually entered into the database. Additionally, we found that there is not an efficient way to make such a determination because the NYSPAD system and the PRL database do not both use a common identifier for the applicators and sellers. For example, NYSPAD uses a unique Department-issued certification identification number for each of the registered applicators and sellers, whereas the PRL database uses several different identifiers that may or may not be unique and may change from year to year. Our analysis of information on the reports received for 2013, 2014, and 2015 shows that either the reports were entered into the PRL, the applicators or sellers were identified as non-compliant, or the applicators or sellers were legitimately excluded (e.g., retirements, illness, death, no applications).

Migration of the PRL Database

In 2016, Article 33, Title 12 of the ECL was amended requiring the Department to develop a pesticide and sales use computer database on its own, which was a major change from the initial requirement that it be developed in conjunction with Cornell. In addition to the PRL database, the Department has six additional pesticide electronic information systems, which were developed in conjunction with Cornell and are maintained at the university. In an effort to update the systems and bring them in-house, the Department contracted in August 2011 to update, merge, and move all seven systems to the Department. The new system, NYSPAD, was to allow the seven systems to function together rather than independently. The development of the system was planned to occur in three stages and be completed by July 2016.

The Department and contractor developed a migration strategy based on the importance of the data and volatility of each of the seven systems. However, unforeseen work and delays slowed the migration process and resulted in six of the seven systems being moved in-house – the sole exception being the PRL database. Department officials indicate that, in both 2014 and 2015, the Department halted efforts to update and migrate the PRL database due to proposed legislative changes that would have impacted the data collected within it. However, the proposed changes were not enacted. Department officials stated the contract to bring the PRL in-house was subsequently not renewed because sufficient funding was unavailable.

During our audit, Department officials stated that they had begun working with OITS to procure a contract to update and transfer the PRL to its system. They informed us that they intend to improve how the system handles errors and minimize the number of delays when the system is brought in-house. According to Department officials, the project is in its preliminary stages and has not yet been submitted to OITS to be placed on OITS' schedule. The Department is currently contracted with Cornell to operate and maintain the PRL database through March 31, 2022, and, as of April 24, 2018, the PRL database still resides on Cornell's systems. We believe it is important to bring the PRL in-house due to several system access and security weaknesses we identified. Department officials responded that Cornell has addressed and resolved the system access and security weaknesses identified during our audit.

Other Matters

The original intent of the PRL was to amend the ECL and Public Health Law to provide for the compiling of pesticide sales and use data that would assist in efforts to assess the impact of pesticides on human health, such as cancer research and education. It was also intended to make aggregate pesticide sales and use data available to the public. The DOH's HRSB considers requests for the release of confidential pesticide information from the PRL database for purposes of specific health-related research projects. Only health researchers approved by the HRSB can access and use the site-specific pesticide application and sales data. However, over the last 20 years, only a couple requests for access to the confidential-level data that the Department collects have been received from researchers. The Department and the HRSB indicate that the PRL database has limited value in terms of correlation with human health issues. HRSB officials stated that a better correlation between pesticides and human health would come from measuring the level of pesticides in the body, rather than where pesticides were applied or the addresses of pesticide purchasers.

Although the Department has previously proposed legislative changes, the proposed changes to the PRL did not address the use of the data or whether the data is being utilized as originally envisioned in the PRL. However, the Department and the HRSB have indicated that there are several other uses for the data, such as:

- Identifying correlations between pesticide usage and human health issues in urban areas (e.g., pest control in New York City);
- Identifying trends in the use of pesticides, such as what products are being used, where they are being used, and how effective they are;

- Developing pesticide management strategies that minimize the effects to the environment;
- Educating applicators and manufacturers on the effectiveness and limitations of various pesticides; and
- Identifying correlations between groundwater quality and pesticide usage.

Notably, though, none of these current uses require the address-level data that the Department is required to collect, store, and aggregate.

Cornell officials told us that the website receives a large number of visits. Reports related to website usage indicated that, for the period August 31, 2016 through August 28, 2017, there were approximately 102,000 hits to the website, an average of 56 page views per day, and roughly 9,000 visitors annually.

We believe Department officials, DOH, and State policy makers should assess whether the limited usefulness of the PRL data warrants any actions to help ensure the data can be better utilized as originally envisioned in the PRL.

Recommendations

1. Work collaboratively with OITS to ensure changes are made to the PRL database reporting system, including, but not limited to, increasing efficiencies for identifying and correcting errors to improve the timeliness of the data reported on the website.
2. Collaborate with OITS during the PRL migration to develop and implement an effective process to ensure that all reports received from registered applicators and sellers are entered into the Department's pesticide systems.

Audit Scope, Objectives, and Methodology

Our audit determined whether the Department's PRL database was accurate and complete based on the self-reported information received under the PRL for the period January 1, 2013 through December 31, 2015, and determined the status of the Department's efforts to implement an in-house database and web-based portal through April 24, 2018.

We assessed the adequacy of the Department's internal controls as they related to its performance and our audit objectives. We reviewed relevant laws and regulations as well as the Department's policies, procedures, and contracts related to the operation and administration of the PRL database. We met with officials of Cornell, the current database administrator, to understand their roles and determine how they fit into the Department's implementation of the PRL. We also met with Department officials and DOH's HRSB officials to obtain information related to the PRL and the data collected. We obtained a copy of the PRL database and reviewed both hard copy and electronic records to compare samples of corrected errors and pesticide sales and applications contained in the PRL database with the original source documents and electronic files submitted. We compared the population of those people and businesses that must report with

the information contained in the PRL database to determine its completeness. We also reviewed contract administration documents related to moving the PRL database in-house.

We selected a statistical sample of 590 out of 178,529 corrected errors for 2013 to determine if the Department had, in fact, corrected the errors shown on its error report in the PRL database. We found 5 of 590 errors tested had not been fixed in the database. Based on this, we are 95 percent confident that, out of the 178,529 corrected errors, there are at least 599 errors that were not fixed in the database. To determine if the data contained in the PRL database accurately reflected the sales reports submitted, we selected a statistical sample of 572 out of 18,068 sales transactions for 2013 through 2015, and found four sales records that did not match the original documentation in the database. We are 95 percent confident that, out of the 18,068 sales records, there are at least 45 sales records that did not match the original documentation. We also selected a statistical sample of 591 out of 22,404,145 application records to determine if the data contained in the PRL database accurately reflected the application reports submitted for 2013 through 2015. All of the items sampled from the database matched the original documentation. Therefore, we are 95 percent confident that, out of the 22,404,145 application records, there could be as many as 113,276 application records that did not match the original documentation. In each of the three samples, the projected results would account for less than 1 percent of the total population, which we consider immaterial and likely attributable to human error.

We conducted our audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. In addition, the Comptroller appoints members to certain boards, commissions, and public authorities, some of whom have minority voting rights. These duties may be considered management functions for purposes of evaluating threats to organizational independence under generally accepted government auditing standards. In our opinion, these functions do not affect our ability to conduct independent audits of program performance.

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

Reporting Requirements

A draft copy of this report was provided to Department officials for their review and formal comment. Their comments were considered in preparing this final report and are attached in their entirety to it. Officials indicated their agreement with, and the steps they are taking to implement, the report's recommendations.

Within 90 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Department of Environmental Conservation shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

Contributors to This Report

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Vision

A team of accountability experts respected for providing information that decision makers value.

Mission

To improve government operations by conducting independent audits, reviews, and evaluations of New York State and New York City taxpayer-financed programs.

Agency Comments

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NOV - 2 2018

Mr. Thomas P. DiNapoli
State Comptroller
State of New York
Office of the State Comptroller
110 State Street
Albany, New York 12236

Dear Comptroller DiNapoli:

The Department of Environmental Conservation (DEC) has reviewed your Draft Report entitled *Oversight of the Pesticide Reporting Law*. DEC's comments with respect to this audit are contained in the enclosed document.

Please contact Ann Lapinski, Director, Office of Internal Audit and Investigation at (518) 402-9218 if you have any questions. Thank you.

Sincerely,



Basil Seggos
Commissioner

Enc.

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CCU#201803925

Department of Environmental Conservation Response
NYS Office of the State Comptroller
Oversight of the Pesticide Reporting Law
Draft Report 2017-S-57

The Department of Environmental Conservation (DEC) has reviewed the draft report dated September 26, 2018 containing the findings and recommendations of the Office of the State Comptroller (OSC) in connection with OSC's audit of DEC's Oversight of the Pesticide Reporting Law (PRL). DEC's response is broken into sections based upon the same sections contained in the report.

Accuracy and Completeness of PRL Data

In terms of the accuracy and completeness of the PRL data, the draft report indicates that, due to limited resources, in 2013 there were 81,176 uncorrected errors entered into the database. The report later describes some numbers of errors in records from 2013 through 2015 that DEC checked but did not fix before DEC entered the data into the database, as well as records in the database that did not match the original documentation. Users report between 6 and 8 million applications and sales in any given year. There are 9 variables in each application record, 9 in each private applicator sales record, and 4 in each restricted use pesticide sales record. That results in about 50 million to 65 million variables reported each year. As the report notes, the projected errors would account for less than one percent of the total population of records for that period, which is considered immaterial. Moreover, not all errors are equal in terms of their significance. Some are minor errors related to a product's name or Environmental Protection Agency (EPA) registration number, or a zip code that may not match the reported County. Others relate to the amount of product applied or sold, some of which may be very small errors and others large. DEC prioritizes error corrections, giving higher priority to those that may have more significant impact on the quantities reported.

There has been a distinct downward trend in the number of errors in reports sent to DEC for correction in the last few years. The number of errors in 2016 was about a third of those in 2014. This is due to the stricter set of validation rules that DEC put in place starting with the 2014 report year as well as direct outreach to all annual report filers. DEC is also working on additional measures to improve the quality of the data that hopefully will reduce DEC's data correction workload.

The draft audit report claims DEC does not confirm that all reports are entered into the database. However, DEC does compile a list of required reporters and then tracks the reports received against this list. As the report indicates, for 2013 through 2015 the reports were either entered into the database, the applicators or sellers required to report were noted as non-compliant, or they were legitimately excluded.

Migration of the PRL Database

DEC decided to delay plans to develop a New York State Pesticide Administration Database (NYSPAD) component to manage the PRL data early on not only to await potential changes that might have occurred as a result of proposed legislation but, more importantly, because NYSPAD is intended to work as a unified system with each component built upon the previous one. Because the information reported under the PRL relates to pesticide applicator certification, business registration and pesticide product registration, DEC decided that it would be more logical and appropriate to

incorporate the PRL after those components were in place. Nevertheless, DEC agrees that it is important to bring the PRL database in-house and plans to do so.

With respect to the system access and security weaknesses identified during the audit, Cornell addressed these issues and resolved them.

Other Matters

Concerning the intent and usefulness of the PRL, DEC is always evaluating the reports produced relative to their usefulness to the public.

Recommendations

DEC intends to work with OITS to incorporate the PRL database into NYSPAD in ways that improve reporting efficiency, accuracy, and manageability.