

**Robustness, Transparency and Fiscal Soundness:
Three Requirements for USDA/NIFA's National Monitoring Plan for Native Bees**

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- I. Core Issue: All models and datasets used to estimate native bee populations must comply with the Data Quality Act**
- II. Data Collection and Modeling is the Basis for Understanding Native Bee Populations**
 - A. Data Collection
 - i. Robustness. The collected data needs to be robust.
 - ii. Inferences. The sample size needs to be large enough to permit knowledgeable inferences.
 - B. Models
 - i. DQA Requirements. The models need to comply with the transparency, reproducibility and other requirements of the Data Quality Act.
 - ii. Early Public Vetting of Models. The models need to be put out for public comment *before* the models are used with real data—this is essential for avoiding the waste of federal resources.
- III. NIFA Should Spend Federal Resources Only on Useable Data and Models**
 - A. Federal law prohibits agencies from relying on data which does not meet DQA standards.
 - B. Thus, NIFA's first order of business in developing the Native Bee National Monitoring Plan is vetting studies, models and datasets to ensure that they are eligible for use.
- IV. Why Native Bees Studies and Data Need to be DQA-Vetted: The Woodcock Example**
 - A. CRE is undertaking an independent reanalysis of a well-known study of non-*Apis* bees, "*Impacts of neonicotinoid use on long-term population changes in wild bees in England*" by Dr. Benjamin Woodcock, Nicholas Isaac, et al. to assess whether it complies with the requirements of the US Data Quality Act.
 - B. CRE has contacted the lead study author and requested a copy of the data that was used. We received a prompt and gracious offer to provide us with the data but we have not yet received the data itself.

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- C. One of the DQA's requirements for influential scientific information is that it provides "sufficient transparency about data and methods that an independent reanalysis could be undertaken by a qualified member of the public. . . ."
- D. CRE will be evaluating the Woodcock study's compliance with the DQA

V. **Conclusion**

- USDA/NIFA's National Monitoring Plan for Native Bees can accept studies, datasets, and models only *after* the information demonstrates compliance with the Data Quality Act.