



**Workforce Assessment for
EPA Office of Pesticides Programs
FINAL REPORT
*March 20th, 2026***

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1. Executive Summary

1.1 Objectives and Key Questions

The Pesticide Registration Improvement Act (PRIA) 5, the latest reauthorization of PRIA, mandated a Workforce Assessment (WFA) to evaluate the workforce responsible for enacting PRIA. This WFA estimates the number of full-time equivalent (FTE) employees required for the EPA Office of Pesticide Programs (OPP) to deliver on its mission under PRIA 5 and related authorities. Conducted by Censeo Consulting Group as an independent third-party assessment mandated by PRIA 5, this analysis builds directly on the Business Process Review (BPR) completed in September 2025, which identified 79 recommendations to improve OPP's registration and review processes.

The WFA comprises three main components:

- 1) A baseline estimate of current FTE demand across OPP's eight divisions, as of FY25,
- 2) A set of forward-looking scenarios that model how FTE needs shift under varying assumptions about submission volumes and efficiency gains,
- 3) An estimate of the surge capacity required to eliminate the existing backlog of cases within a defined timeframe.

Together, these analyses give OPP and Congress a data-driven foundation for workforce planning decisions.

It is important to note what this initial assessment does not address. The WFA provides a top-line estimate of total FTE capacity needs across divisions but does not assess specific skill or training gaps, examine individual role requirements, or evaluate structural or cultural factors affecting workforce performance. These areas are essential components of the full PRIA 5 workforce assessment scope and are outlined as priority next-phase analyses in Section 5 of this report.

1.2 High Level Findings

OPP faces a capacity gap in every modeled scenario.

The analysis modeled four steady state scenarios reflecting different combinations of future submission volume changes and efficiency gains from implementation of business process and technology improvements. In all four scenarios, the number of FTEs required to process incoming work on time exceeds OPP's current baseline of 532 FTEs (466 working-level), as of FY25. **The gap ranges from 24 FTEs in the most favorable scenario to 200 FTEs under increased demand.** In the event there are **no efficiency gains or continued volume declines, OPP could need up to 703 FTEs—a gap of 171.** If volumes increase and OPP achieves moderate efficiency gains, OPP would need up to 732 FTEs to maintain performance (a gap of 200 FTEs). Under the most ideal scenario, there is a gap of 24 FTEs from the current state to the calculated required total of 556 FTEs. Thus, even under the best-case assumptions, process improvement alone is unlikely to close the staffing gap.

Capacity gaps are unevenly distributed across divisions.

Division-level results reveal that workforce impacts are not uniform. **PRD and BEAD show the most persistent and pronounced shortfalls across all scenarios**, driven not by outsized workloads but by the largest gap between FY25 FTE capacity and what is required to process their annual workload. BPPD and IO show modest surpluses under favorable assumptions, but these surpluses are small relative to the shortfalls elsewhere and staff are not readily transferable due to specialized skill requirements. The

finding that aggregate OPP-level numbers mask significant division-level variation underscores the need for division-specific workforce strategies.

Clearing the backlog requires substantial, dedicated surge capacity.

To meet OPP's goal of eliminating the FY25 backlog volume by FY30, **the analysis estimates that a total of 521 surge working level FTEs would be needed annually over a three-year execution window (FY27–FY29)**, with FY26 as a preparation year for hiring and onboarding and FY27 serving as a ramp-up year to begin execution and increase productivity. These FTEs are calculated separately from steady state needs and would be required on top of the aforementioned 24 to 200 FTEs discussed above if OPP were to prevent further backlog accumulation. Approximately two-thirds of the backlog workload comes from registration review cases, which are uniquely complex and have components dependent on inputs from external agencies.

While non-PRIA actions make up most of the volume of the backlog, these actions have a comparatively smaller workload as they take less time to complete. If OPP instead prioritizes clearing the PRIA and non-PRIA backlog first—the actions industry is most concerned with—the surge requirement drops to approximately 162 working level FTEs, providing a more immediately actionable path while still making meaningful progress on the overall backlog. This would allow OPP to build upon the momentum they have created in significantly reducing the PRIA and non-PRIA backlog to date.

Putting this all together, a coordinated hiring effort is key to long-term success.

When steady state staffing needs are combined with the surge staff required to clear the backlog, OPP would need to nearly double its workforce, even under the low FTE scenario. This estimate assumes the backlog is cleared by FY30, which is an aggressive goal and would require up to 521 temporary surge FTEs in addition to staff needed to handle new submissions. If OPP hires for steady state operations while also working down the backlog, total staffing would need to reach between 1,077 and 1,253 total FTEs over the three-year backlog reduction period, depending on the scenario. After the backlog is cleared and surge staff are no longer needed, OPP would still fall short of the FTE levels required to meet steady state demand unless changes are made. The chart below shows total FTE needs across scenarios, including steady state, surge support, and manager, while assuming a three-year backlog clearance period through FY30.

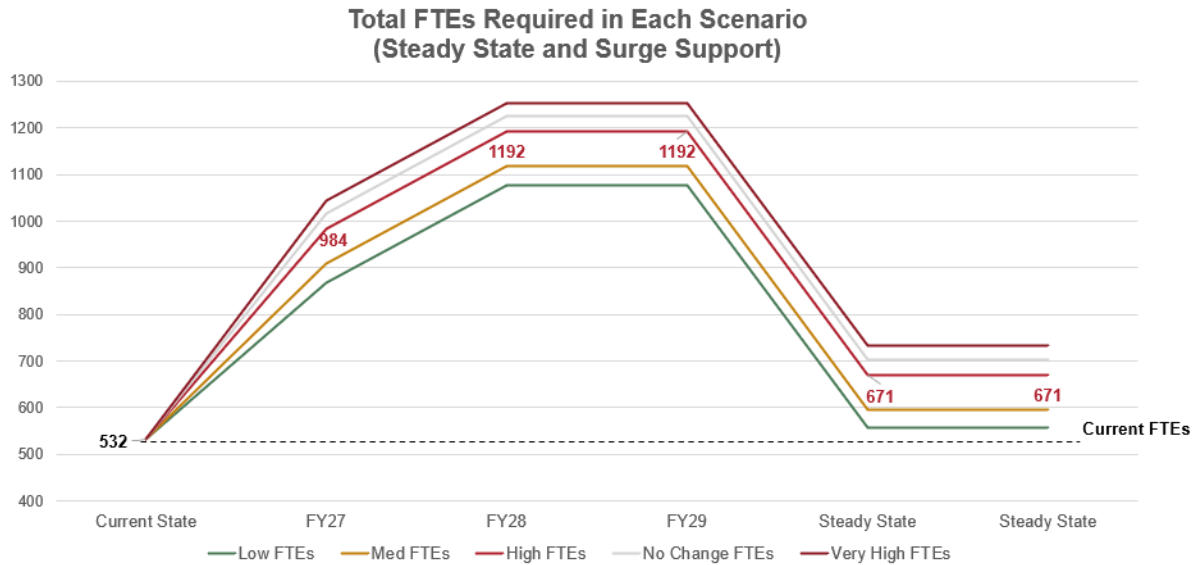


Figure 1: Total FTEs required for each modeled scenario, combining working level, managerial, and surge support roles.

Investing in BPR improvements can significantly reduce the need to permanently expand the workforce.

A critical insight from this assessment is that the projected efficiency gains—and the corresponding reductions in permanent staffing needs—depend on sustained investments in and implementation of the 79 BPR recommendations. **The low-FTE scenario assumes a 20% efficiency gain, which requires full implementation of all BPR recommendations, backlog clearance, IT modernization, and dedicated surge support for process improvement work.** Even the most conservative scenario assumes a 5% gain from completing improvements already in progress. Fully advancing these initiatives would materially reduce long-term workforce expansion needs and strengthen operational performance. Conversely, delaying or scaling back BPR implementation would increase reliance on permanent staffing growth to meet workload demands. Workforce planning and process improvement are interdependent and must advance in parallel.

1.3 Implications for OPP and Congress

Investment in the OPP workforce is necessary, not optional. The persistent capacity gap across all scenarios means OPP cannot meet PRIA 5 statutory timelines, respond to industry expectations, or prevent further backlog accumulation at existing staffing levels. The analysis provides a data-backed case for targeted investment in additional FTEs, with the magnitude depending on how volumes and efficiency gains evolve over the coming years.

Focusing backlog efforts on PRIA and non-PRIA actions first will make more efficient use of available FTE capacity. The backlog will not resolve itself through normal operations; it requires dedicated surge capacity. Bringing on the large numbers of new staff required to eliminate all backlogs will strain existing staff, who will have to dedicate a portion of their already limited time to hire, contract, train, and supervise the surge support. This surge support remains critical to reducing the total backlog. While OPP has been able to make dedicated efforts to reduce the backlog to date, without surge support existing staff will not be able to completely address the backlog in the planned three-year period without

significant process improvements or working longer hours. The phased approach—prioritizing PRIA and non-PRIA backlog first—offers a pragmatic path to demonstrable results within a reasonable timeframe.

Process improvement is the multiplier that determines where OPP lands in the range. Though increased capacity is a necessity, the difference between needing 24 additional FTEs and needing 200 is largely a function of how effectively OPP implements BPR recommendations and modernizes its technology and workflows. Sustained investment in the BPR implementation track—including a cross-functional PMO, Salesforce improvements, workflow automation, and registrant-facing communication enhancements—is essential to realizing the efficiency gains that every scenario assumes. Without this investment, the workforce gap will remain at the high end of the range, requiring a significant increase in staffing to close it.

1.4 The Path Forward: An Integrated Roadmap

This initial assessment establishes the quantitative foundation for OPP’s workforce strategy—how many FTEs are needed, where the gaps are, and what it will take to clear the backlog. However, the full scope of the PRIA 5 workforce assessment extends further to include analysis of mission-critical occupations, demographic characteristics, retirement eligibility, turnover, recruitment and retention, and recommendations for adequate staffing and best practices.

Figure 2 provides a suggested roadmap to guide OPP from its FY25 baseline to a more mature and sustainable workforce planning approach that fully lives up to the vision of PRIA 5. Critically, this roadmap shows two parallel tracks: the workforce assessment phases (top) and BPR recommendation implementation (bottom).

This dual-track structure reflects a central finding of this assessment; that the efficiency gains assumed in every workforce scenario are contingent on sustained BPR implementation, and that neither track can succeed in isolation. The BPR implementation track progresses from the initial prioritization of high-impact recommendations and PMO standup through process standardization and digital transformation, ultimately supporting the sustained 5–20% efficiency improvements that the workforce scenarios depend on.

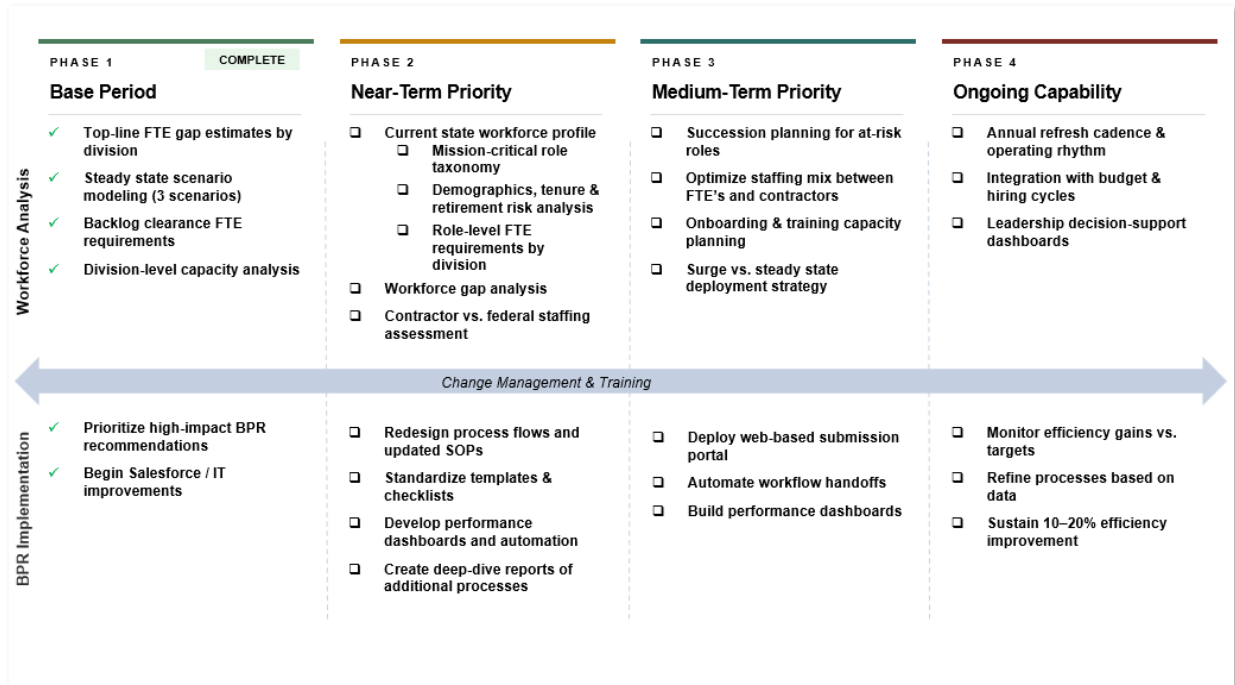


Figure 2: Integrated workforce and process improvement roadmap from initial baseline to full PRIA 5 compliance.

Each phase of the workforce track builds on the one before it. The top-line FTE estimates in this report inform the role-level analyses in Phase 2, which shape the recruitment and retention strategies in Phase 3, culminating in an institutionalized capability that OPP can maintain independently. In parallel, BPR implementation progresses from improvements in application intake to full digital transformation, with each phase's efficiency outcomes feeding directly into updated workforce projections.

The capacity gaps identified in this report are not self-correcting. Without deliberate action to hire, train, and deploy additional staff (guided by increasingly precise workforce intelligence and supported by sustained process improvement) OPP will face growing difficulty meeting statutory timelines, managing registrant expectations, and maintaining the scientific rigor on which its credibility depends. The path forward is clear, and the work done to date provides a strong foundation on which to build.

2. Introduction

2.1 About OPP and its Mission

OPP plays a central role in evaluating, registering, and reviewing pesticide products to ensure they meet safety standards for human health and the environment. OPP operates at the intersection of science, regulation, and industry, where timely and predictable decision-making is critical to advancing EPA’s broader goals. With a diverse portfolio that spans risk assessment, product labeling, data evaluation, and stakeholder communication, OPP’s performance directly impacts both the pace of innovation and public trust in the regulatory system.

OPP is structured into seven specialized divisions, categorized into regulatory divisions and science divisions, and an eighth Immediate Office (IO) that oversees them. This analysis was conducted after the FY25 staff reorganization and reflects the resulting structure of the office. These divisions collaborate to review pesticide applications, conduct scientific assessments, ensure compliance with labeling and data requirements, and engage with registrants and stakeholders. The office manages thousands of actions annually and is responsible for both pre-market approvals and ongoing post-market oversight. Its work touches a wide range of users—from large agricultural producers to small businesses and public health agencies—and must balance scientific integrity, legal mandates, and operational efficiency.

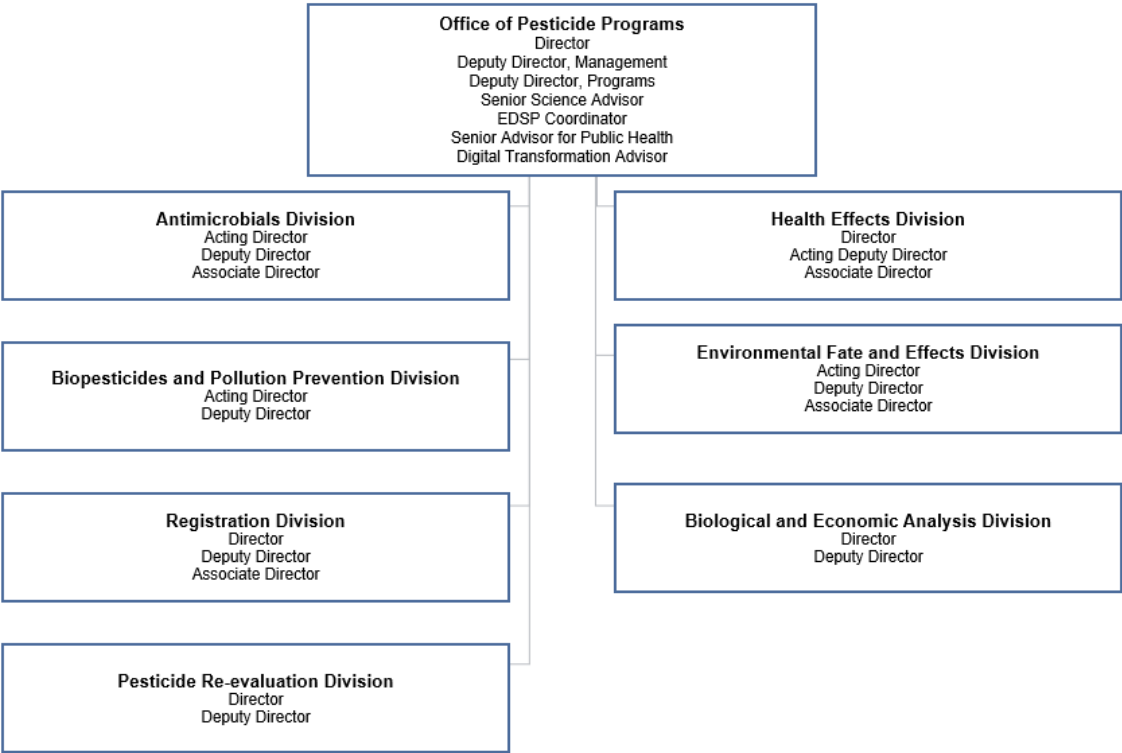


Figure 3: As of FY25, OPP is structured into seven specialized divisions.

Over the last decade, OPP’s regulatory workload has grown substantially in both volume and complexity. Expansion of scientific review requirements, increases in statutory and policy mandates, and evolving industry expectations have all placed growing pressure on staff capacity. These demands have been compounded by prolonged vacancies, hiring restrictions, and uneven resource distribution across

divisions. The result has been a workforce stretched across competing priorities, managing statutory PRIA deadlines, addressing registration review backlogs, and supporting new priorities such as farmworker safety and emerging technology reviews.

2.2 PRIA 5

PRIA 5 was the latest reauthorization of PRIA legislation, enacted in December 2022. There were several objectives associated with PRIA 5, including ensuring that EPA had the necessary tools, resources, and funding to conduct its pesticide registration and review processes, making these processes more efficient, increasing communication and transparency, and prioritizing farmworker safety and the protection of endangered species. To support these objectives, PRIA 5 introduced revised decision review timelines that reflect the complexity and resource requirements of different action types, along with an updated fee structure designed to provide sustainable funding for staffing needs and operational improvements.

Moreover, among the PRIA 5 mandates is a requirement for an independent third-party BPR and WFA that evaluates the staffing resources responsible for implementing PRIA 5 and its amendments and reports those findings to EPA and Congress. Together, the two reports are meant to give OPP a coherent view of both how work moves through the system and how many people are needed to carry that work to completion.

2.3 Summary of Themes from BPR Report

The BPR report (completed in September of 2025) found that OPP has already taken meaningful steps to modernize and strengthen core operations, including expanding registrant guidance to reduce common submission deficiencies and improving internal and external action tracking through Salesforce and MyPest. They have also taken targeted actions to reduce the non-PRIA backlog through streamlined reviews, withdrawal of outdated submissions, and cross-training. These efforts created a stronger baseline for performance monitoring and further automation.

At the same time, the BPR identified a set of cross-cutting barriers that continue to drive delays, rework, and inconsistent outcomes across the lifecycle of applications and registration processes. Three common themes emerged:

1. **Underutilized tools and data quality gaps** limit visibility into bottlenecks and constrain leaders' ability to actively manage workload and reallocate effort.
2. **Process fragmentation and unclear ownership** across handoffs create duplicative reviews, inconsistent application of criteria, and accountability gaps.
3. **Limited guidance and knowledge gaps** (including uneven access to clear, up-to-date policies and prior decisions) increase variability across reviewers and divisions and require additional back-and-forth to resolve avoidable questions.

Collectively, these operational challenges have an adverse impact on registrant experience. Across multiple areas, registrants face unclear expectations, inconsistent communication, low transparency into application status and timing, and difficulty forecasting business decisions when timelines slip.

The BPR findings directly reinforce the need for a workforce assessment. For example, the BPR points to uneven workload distribution, including evidence that application assignments can vary significantly by reviewer and that some staff carry a very high volume at once. Likewise, registrant frustrations due to inconsistent communication are just as much a function of capacity constraints within OPP as they are driven by process or technology limitations. In this way, the BPR establishes that process improvements

and modernization are necessary but not sufficient on their own. The workforce assessment builds on that foundation by estimating the overall workforce capacity required to sustainably meet statutory timelines, reduce backlogs, and stabilize performance.

2.4 Workforce Assessment Overview

Within the statutory context of PRIA 5, the purpose of the WFA is to estimate the total number of FTE staff needed for OPP to deliver on its mission under PRIA 5 and related authorities. The assessment provides a top-line estimate of FTEs required to complete OPP's FY25 workload under various scenarios and conditions and compares that estimate to existing staffing levels to quantify the gap.

In addition, the analysis estimates the surge capacity needed to work through the existing backlog of registrations and applications within defined timeframes and future FTE needs based on historical workload trends and anticipated application volumes. As the BPR report documented, lengthy backlogs have been a persistent challenge for the program. Without the ability to keep up with incoming submission volumes, they have continued to accumulate over time, creating a significant operational challenge to manage the backlog alongside new submissions and meet statutory obligations. In this environment, timeliness can vary by work type, and the program has faced recurring pressure to keep pace with required decision timeframes. When workloads are high, staff prioritize core review activities, and routine status updates and registrant communications are often delayed.

This assessment focuses on PRIA, non-PRIA, and registration review actions, as well as cross-cutting scientific support functions, and highlights how workforce needs vary by division. These results are intended to inform internal planning and to support data-driven discussions with Congress and other stakeholders about the resources required to sustain timely, science-based decision making.

To fulfill the PRIA 5 mandate and evaluate the workforce enacting it, our methodology had three primary objectives:

1. **Establish a baseline understanding of FY25 workforce demand** by mapping division-level FTE needs across PRIA actions, non-PRIA actions, and registration review cases.
2. **Assess future workforce requirements under steady state conditions** by modeling how FTE needs may change across scenarios reflecting varying submission volumes and efficiency improvements identified in the BPR report.
3. **Quantify additional surge staffing required to address the existing backlog** by estimating the number of incremental FTEs needed to eliminate the backlog.

It is important to also note what this workforce assessment does not address. The WFA provides a top-line estimate of total FTE capacity needs but does not assess specific skill or training gaps within the existing workforce, nor does it examine individual role requirements or competency levels across positions. The assessment does not evaluate structural or cultural issues that may affect workforce performance, employee satisfaction, or retention, nor does it analyze demographic trends, training, succession planning needs, or the adequacy of current recruitment and onboarding practices.

Moreover, this assessment does not provide detailed recommendations on contractor versus federal staffing mix, organizational structure, or management practices. These areas, while important to OPP's overall workforce sustainability, are outside the scope of this initial assessment but may be addressed in future analyses as noted in Section 5.2.

3. WFA Approach

3.1 WFA Methodology

The assessment was broken into three main phases of work, first cleaning and organizing the inputs to define the workload and capacity baseline and then conducting two primary analyses – calculating steady state and backlog FTE needs. The analysis focused on organizing data by action types, categorized by PRIA, non-PRIA, and Registration Review actions. These action types represent the bulk of OPP's day-to-day workload and provide a consistent measure to track FTE needs across divisions. Our results provide insights into FTEs at the division (AD, BPPD, RD, PRD, EFED, BEAD, HED, and IO) and aggregate OPP level. The breakdown of the analysis phases is as follows:

- 1) **Phase 1: Establish workload baseline**
 - a) Estimate level of effort by action type
 - b) Analyze historical action volume trend
 - c) Document FY25 backlog
 - d) Identify FY25 working level FTE capacity
- 2) **Phase 2: Forecast steady state workforce requirements**
 - a) Develop workload forecast scenarios
 - b) Calculate steady state FTE requirements
- 3) **Phase 3: Estimate surge workforce requirement to clear backlog**
 - a) Calculate surge FTE requirements

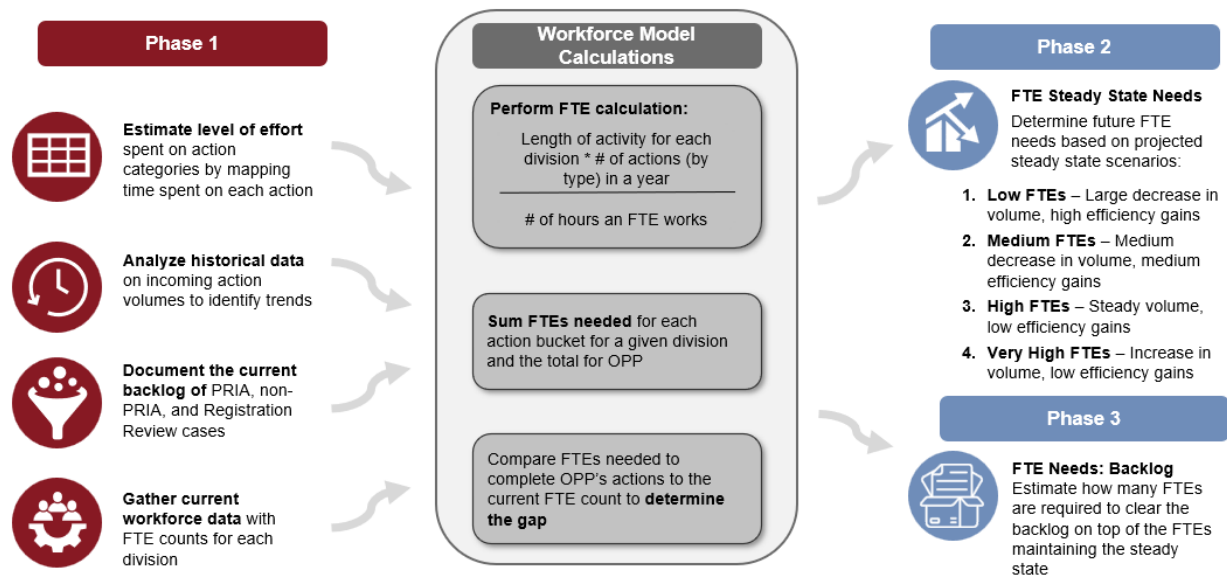


Figure 4: This framework guided our quantitative assessment of OPP's workforce needs.

Phase 1: Establish workload baseline

1a) Estimate level of effort by action type

OPP Division Directors (DDs) provided an estimate of the amount of time each division spends completing a single action for each action type in the analysis, on average. To ensure that estimates were realistic and consistent across divisions, the DDs met for an internal validation check. This also served to

avoid double-counting or duplication across divisions, so that time spent on a single task was only counted once and each division accounts only for their individual time spent on that work. The DDs also reviewed the list of action types for completion, validating that the categories listed captured the distinct types of work done to support PRIA 5 and related priorities as well as non-PRIA and registration review workstreams that comprise the bulk of OPP's daily workload.

In addition to time spent on a given action, the Division Directors also provided an average of the number of each action type each division typically receives in a year, averaging across the total volume received in FY23, FY24, and FY25. Censeo utilized these two inputs to establish a baseline of the average hours spent each year based on action type, which served as a foundation for the following analyses. See the *Limitations* sections for an explanation of why this approach was selected.

To structure the evaluation, the Censeo team grouped action types by broader categories based on their relation to PRIA 5 work, determined by the relevant codes of the individual action. These groupings include:

Action Category	Action / Work Type
PRIA Actions	• New Active Ingredient (AI) • New Use • New Product – Registered Source • New Product - Unregistered Source • Amendment • Other (regulatory only) • Other (with science)
Non-PRIA Actions	• 18/24c • Incidents • Notifications • Fast-Track Label Amendments • Formulation Amendments • Data Review • Re-evaluation (Reg Review Labels) • Other
Registration Review Cases	• Problem Formulation / Work Plan (PWP and FWP) • Draft Risk Assessment (DRA) • Decision Phase (proposed (interim) decision to (interim) decision)
Miscellaneous Work	• Process, policy, and science improvement work • Communications, petitions, and litigation support • Lab (S&T funding)

Table 1: Breakdown of action types to the related action category.

1b) Analyze historical action volume trend

The next step was to review historic volumes of incoming submissions and identify trends. The primary dataset (exported from Salesforce) contained all incoming submissions (PRIA and non-PRIA) received by the agency from FY20 to FY25. This submission data was normalized across divisions and categorized by action type. The Censeo team projected out future incoming volumes of action types for FY26 and FY27 based on the trends seen in this historic submission data.

Historical data on registration review was gathered separately through conversations with the divisions to define parameters and determine what the typical number of registration review cases in a year would be under ideal conditions, assuming timely inputs from external (non-OPP) parties. This approach was required as historical registration review workload was highly constrained by available resources, limiting its value for forecasting purposes.

1c) Document FY25 backlog

Historical data was also used to estimate the size of the FY25 backlog, defined as the number of cases that were still pending past their original due date as of the date of analysis. This data came from Salesforce for PRIA and non-PRIA actions and was collected from the DDs directly for registration review cases. The backlog data was broken out by action type and by division. The backlog volume data was used directly in the phase 3 analysis.

1d) Identify FY25 working level FTE capacity

OPP provided a list of all FY25 FTEs that the Censeo team categorized into working level or managerial roles for the analysis. OPP recently underwent a reorganization and approved the existing number of managerial roles, which will stay constant at about 52 in the short term. This report was developed after the reorganization, so all workforce changes made are reflected in the data. The scope of the assessment, as defined by PRIA 5, is on work related to the implementation of PRIA 5 and other key workstreams like non-PRIA and registration review, so only FTEs who work directly on these areas are included in the analysis. These FTE counts were broken out by division and served as a basis of comparison for the phase 2 analysis of steady state FTE requirements.

OPP also provided a breakdown of the hours each division spends completing one of a given action type included in the analysis, which was used to calculate the FY25 workload.

Phase 2: Forecast steady state workforce requirements

2a) Develop workload forecast scenarios

To obtain a complete picture of potential FTE requirements, we analyzed staffing needs under multiple conditions. Workforce demand at OPP is primarily driven by the volume of incoming actions and the efficiency with which that work can be completed, both of which are subject to change over time. Modeling a range of steady state scenarios allows the assessment to evaluate how staffing needs shift as submissions volumes fluctuate and as efficiency gains are realized. This approach provides OPP with a clear view of potential capacity risks and staffing implications across plausible operating conditions, supporting informed, resilient workforce planning decisions.

To get a comprehensive overview of workforce needs under different conditions, the Censeo team defined potential steady state scenarios based on historic trends and anticipated future shifts in volume and efficiency gains. The team applied quantitative and qualitative analyses to the available data and methods for representing the workforce that implements PRIA 5 and related amendments, then applied that information to the defined scenarios to estimate how FTE needs would change under each scenario.

The Censeo team developed four potential steady state scenarios, assuming different combinations of future incoming submission volumes and efficiency gains to test how FTE needs could shift. These scenarios fall into a low, medium, high, and very high estimate for steady state FTE needs.

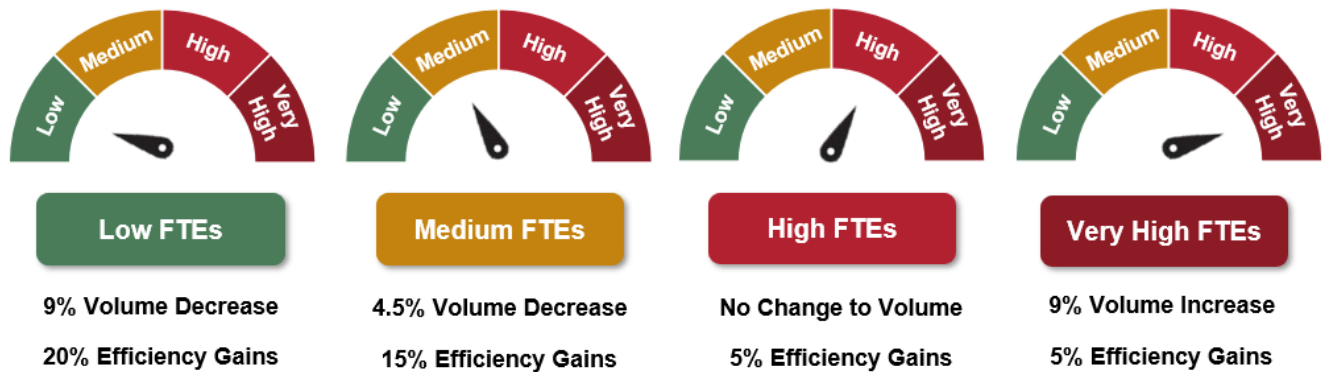


Figure 5: These scenarios projected changing volume and efficiency gains to estimate potential steady state FTE needs.

1. Low FTE Estimate – Large volume decrease and high efficiency gains

- Future volumes decrease by 9% for incoming PRIA and non-PRIA submissions, following the historic trend of declining volumes over the past 5 years.*
- High efficiency gains of 20%.* This assumes that OPP implements the full set of 79 recommendations from the BPR report, addresses the existing backlog, improves IT systems and functionality, and engages external support to implement process improvement efforts, thereby freeing up ~5% of total hours that OPP staff currently spend on implementing process improvements.

2. Medium FTE Estimate – Moderate volume decrease and moderate efficiency gains

- Future volumes decrease by 4.5% for incoming PRIA and non-PRIA submissions, assuming the historical decline moderates over time.*
- Medium efficiency gains of 15%.* OPP relies on existing staff to implement the full set of 79 recommendations from the BPR report, addresses the existing backlog, and improves IT systems and functionality.

3. High FTE Estimate – Stable volume and low efficiency gains

- Future volumes decrease by 0% for incoming PRIA and non-PRIA submissions, assuming the historical trend stays steady.*
- Medium efficiency gains of 5%.* OPP finalizes the completion of the existing backlog and actions taken to improve IT systems and functionality.

4. Very High FTE Estimate – Increase volume and low efficiency gains

- Future volumes increase by 9% for incoming PRIA and non-PRIA submissions, modeling a potential future scenario.*
- Medium efficiency gains of 5%.* OPP finalizes the completion of the existing backlog and actions taken to improve IT systems and functionality.

We derived these values and percentages by first aligning historical volume data to the DD provided data, using the three-year historical average to estimate FY25 volumes by action type. Those estimates were then projected forward using historical trends to model FY26 volumes and applied across low, medium, and high scenarios that vary assumptions about submission volume changes and efficiency gains to estimate resulting workforce needs.

The very high scenario that assumes a volume increase is included for the sake of completeness for potential future steady states but is not based on robust data¹. Early FY26 data shows an uptick in new active ingredient applications – complex submissions that require more FTE hours to process – which could suggest a broader increase in overall submissions. However, this evidence is preliminary and not conclusive. A scenario with a volume increase is thus included to represent the full range of possibilities of steady state submissions, rather than as a data-driven projection in this analysis.

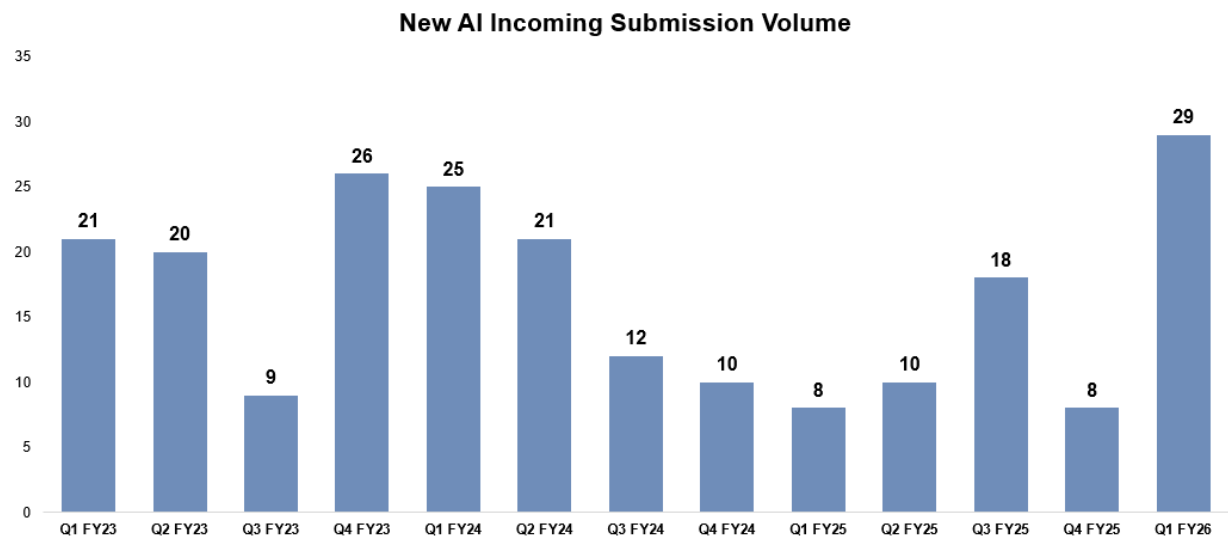


Figure 6: Trend of incoming new AI submissions from Q1 FY23 to Q1 FY26.

2b) Calculate steady state FTE requirements

This phase produced scenario-specific estimates for steady state FTE needs, enabling comparison across scenarios and against FY25 staffing levels to identify potential capacity gaps or surpluses.

These assumptions – specifically the varying workload volumes and projected efficiency gains in each scenario – are used to calculate the number of FTEs required to process incoming work in a steady state environment, which is defined as one in which work is completed as it arrives, without increasing or adding to the backlog. Using the baseline FY25 estimated volumes developed in Phase 1, the team adjusted incoming workload levels according to each scenario’s volume assumptions. Projected efficiency gains were then incorporated to reflect improvements in how work is performed. Together, these modified volume and efficiency inputs produced the final steady state FTE requirements for each of the four scenarios.

Each scenario-specific FTE count was compared back to the original working level FTE count to determine if OPP would experience a gap or surplus under each set of assumptions. This FTE count was also broken down at the division level to get a deeper look at where the capacity gaps or surpluses were originating and identify potential opportunities for reallocation across divisions.

¹ Incoming submission data goes back to FY20, and the data shows a persistent decrease year over year for both PRIA and non-PRIA actions. While there is no historic evidence that points to a potential increase in submissions, preliminary FY26 data shows it may be possible.

Phase 3: Estimate surge workforce requirement to clear backlog

3a) Calculate surge FTE requirement

A separate analysis was conducted to determine the number of FTEs required to process the backlog volume as of FY25 alone. This analysis estimates the number of FTEs required to eliminate the backlog in alignment line with OPP's goal of completing all outstanding actions by the start of FY30. The Censeo team modeled this backlog reduction effort in two phases: preparation and execution. The preparation phase, spanning FY26, is assumed to involve planning for and beginning to hire and train the surge staff needed for the effort. Beginning in FY27, these FTEs would focus on processing backlog actions, with the goal of completing all work by September 2029, representing a three-year execution period. During FY27, surge FTEs are expected to be less efficient as they continue training and gaining familiarity with the work. By FY28 and FY29, these staff are assumed to reach full efficiency, and unlike steady state FTEs, would be able to dedicate their time fully to backlog reduction without diversion to process improvement or other administrative tasks. The backlog analysis incorporates these assumptions to evaluate the FTE requirements over this three-year period to ensure the backlog is cleared on schedule.

Actions were considered "in the backlog" if they exceeded their original due date. However, certain elements of the OPP's final decision rely on information or determinations from registrants or external agencies. Delays in receiving updated data, clarifications, or external agency decisions can stall the review process and increase the likelihood that a case falls into the backlog.

For this analysis, we assume all required external inputs are provided within the identified timeframes. Under this assumption, once the relevant divisions begin their review of a case, their work proceeds without additional external interruptions. This means the projected timeline to clear the backlog by the end of FY29 does not account for further delays caused by factors outside OPP's control.

3.2 General WFA Assumptions

The workforce analysis relied upon key assumptions to best leverage the available data:

1. An **FTE is assumed to have 1700² annual productive hours**, accounting for time spent on annual leave, holidays, and training/administrative work for both FY25 and steady state projections.
2. The analysis assumes that **time spent on a given action type is normally distributed**.
 - a. The average time spent on an action is an input for estimating FTEs required to complete that action. The level of effort or time spent per action is not anticipated to change in the short-term future, outside of efficiency gains from BPR recommendation implementation.
3. **Estimates for registration review cases assume timely inputs** from the agencies and registrants.
 - a. This is not true in practice but represents the ideal scenario for the resources OPP would need to complete its portion of the review on time.
4. Estimates for **registration review assume the volume of deliverables/work products is consistent year over year**, with a similar amount of time spent on each deliverable, year over year.
 - a. This may not be true in practice but represents the ideal scenario for the resources OPP would need to complete its portion of the review on time.

² For the backlog analysis, this figure is adjusted to reflect ramp-up in surge support productivity over four years, with effective hours increasing from 1,500 in FY27 to 1,800 in FY28 and FY29

5. The analysis assumes that **efficiency gains are equally distributed** across divisions and all action types for each steady state scenario.
6. **Delays outside OPP's control are not reflected in backlog estimates**, and all required external inputs (e.g., registrant data and inter-agency decisions) are received on time.

These assumptions allowed the Censeo team to make best use of the available data to conduct a structured assessment, generate representative estimates, and meet OPP's immediate workforce forecasting needs.

3.3 Limitations

The analysis was subject to structural data limitations, including gaps in data availability and inconsistencies in how key information is collected across divisions. While these challenges constrained the precision of certain estimates, they reflect broader, known data issues that OPP is actively working to address. Within these constraints, the analysis was designed to produce practical, decision-relevant insights to support workforce planning. These limitations include:

1. The analysis was **limited to working level employees** who spent most of their time working on the above action types in support of PRIA 5 mandates and mission-critical pesticide review work. This means managers and employees who do not work directly on PRIA, non-PRIA, or registration review assessments or regulatory work were not included in the FTE scenario or backlog analyses, such as those in the IO division.
2. All calculations of the time spent on action types is rolled up at the action type level, with **no distinction based on employee role or sub-task**.
3. The Censeo team **did not have access to reliable Salesforce/CDX workload data**.
 - a. The Salesforce and CDX systems do not currently collect data for time spent on actions, workload, or performance metrics. The findings in this report are based on OPP-provided estimates for the volume of work done and the time spent completing work, averaged based on the distinct action types.
 - b. Salesforce data were used to validate division-provided volume data, but these data were based on manual entry or status updates in the system by OPP staff, which were said to be performed inconsistently, limiting the reliability of the dataset.
4. **Registration review data was particularly limited**, as this process relies on inputs from external agencies that often delay completion (e.g., data call-ins) and the process flow is not tracked formally in Salesforce as it is for PRIA actions.
 - a. The regulatory divisions (PRD, AD, and BPPD) instead provided an estimation of the volumes and time spent completing registration review tasks.
5. The Censeo team **could not obtain official internal or external projections on future submission volumes** and had to derive estimates of future volumes based on the trends seen in the last 5 years of submission data, assuming trends will continue over the next two years.
6. **Historic volume data was limited to the last 5 years** of submission data, as incoming submissions were tracked consistently in Salesforce for all divisions beginning in FY20.
7. The steady state scenarios assume any **changes to volumes are consistent across action types** (all see a decrease or all see an increase of the same magnitude).
 - a. In the real world, volumes changes will vary by action type, and the direction and magnitude of the change could have a big impact on the total FTEs required to process those action types. Our forecast does not provide this level of granularity.

4. Workforce Assessment Results

4.1 Workload Trends & Staffing Constraints

The WFA assessment began with an analysis of historic trends in both action volume and FTE levels to explore how capacity gaps evolved over time and inform the forecast of future workforce needs. Recent workload patterns show declining incoming action volumes across both PRIA and non-PRIA action types, with occasional small spikes in volume. Historic counts indicate non-PRIA volumes surged in FY20–FY21 (peaking above ~8K distinct actions) and then declined steadily through FY25 (to ~3.9K). Part of this initial surge can be attributed to an increase in COVID-related submissions and litigation in FY20 and FY21. PRIA volumes show a similar pattern, peaking around FY20 (~3K) and tapering from FY24–FY25. Even with the post-peak decline, the workload remains significant and spans multiple action types with differing levels of complexity and coordination burdens. It should be noted that OPP has made efforts to simplify and consolidate certain action types, further reducing the total number of PRIA and non-PRIA applications year over year.

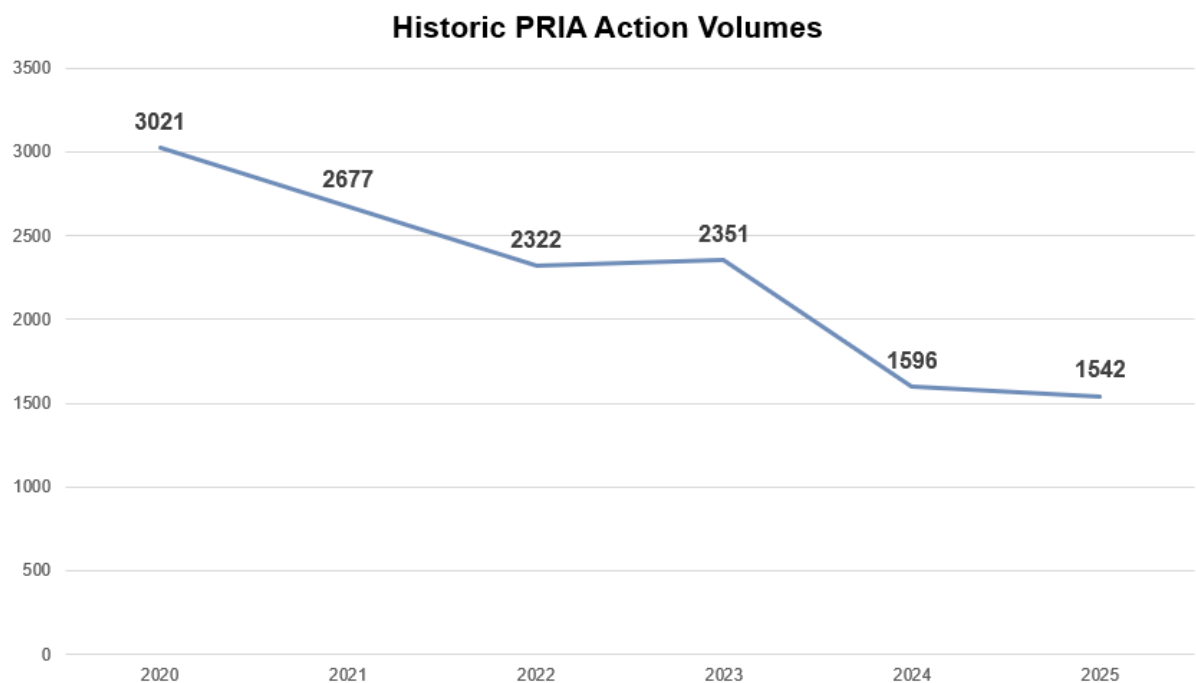


Figure 7: This chart shows the total number of incoming PRIA submissions from FY20-FY25.

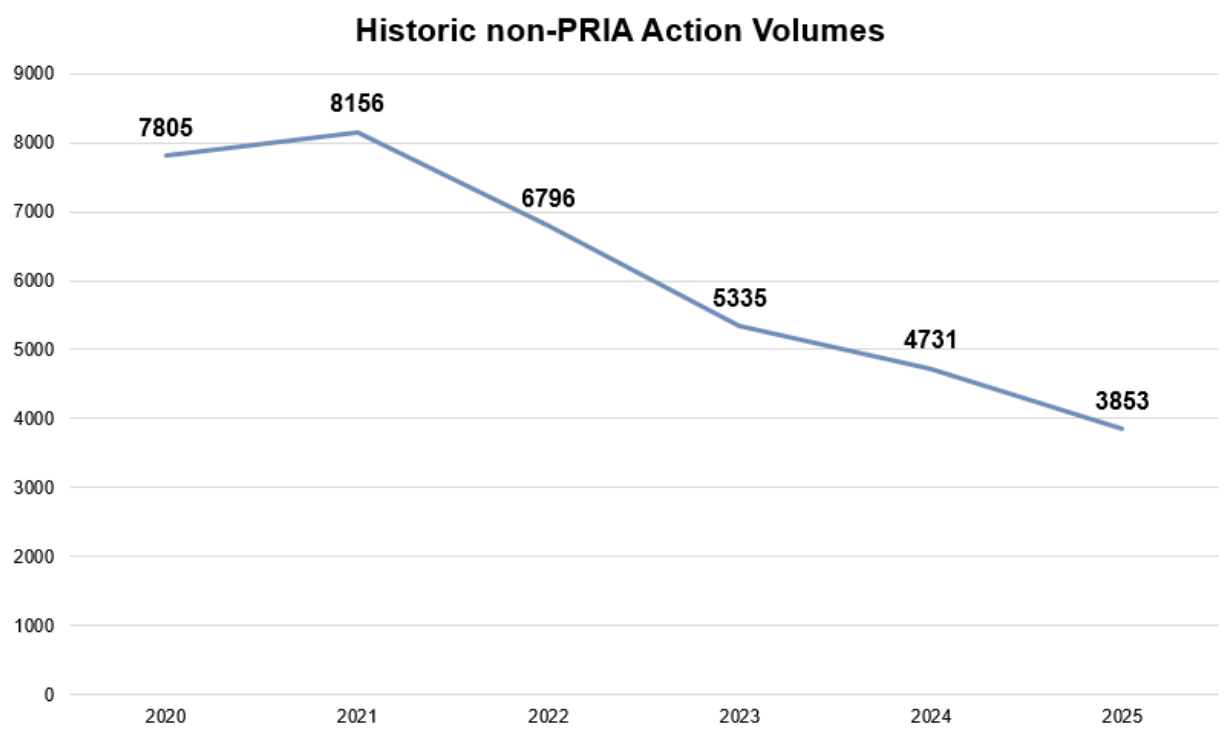


Figure 8: This chart shows the total number of incoming non-PRIA submissions from FY20-FY25.

Staffing levels have also varied significantly over the past decade, but they have stabilized somewhat in recent years. Historic FTE levels show a sustained decrease to a low point around FY18 (~495 FTE). After that low, staffing rose through FY21 (~603) to meet the surge in incoming actions before declining again and ultimately stabilizing in the mid-500s by FY25 (~553).

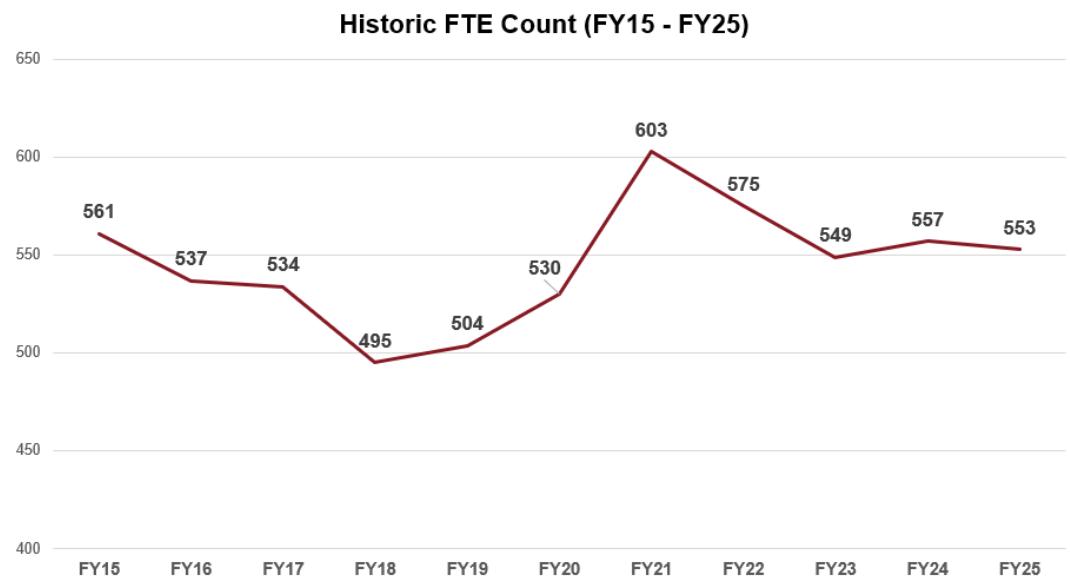


Figure 9: This chart shows the total FTEs at OPP from FY15-FY25.

4.2 Steady State Scenarios

Overview

This section presents the results of the steady state analysis which compares the current state FTE baseline to four future operating conditions. These include a no-change scenario in which FY25 volumes and efficiency persist, alongside four projected steady state scenarios reflecting different assumptions about incoming workload volumes and efficiency gains. Together, these comparisons illustrate how workforce needs may evolve under a range of plausible real-world conditions and provide context for understanding potential capacity gaps or surpluses relative to today’s staffing levels.

Censeo began the steady state analysis by determining the existing size of the workforce across the divisions to establish a baseline for comparison. Leaders, supervisors, and others not directly involved in processing actions for a majority of time were excluded from the analysis. Figure 6 shows the division-level distribution of FTEs. There are currently 466 *working-level FTEs as of FY25*, those directly involved in the processing of PRIA, non-PRIA, and registration review actions as well as the miscellaneous tasks required to support that work.

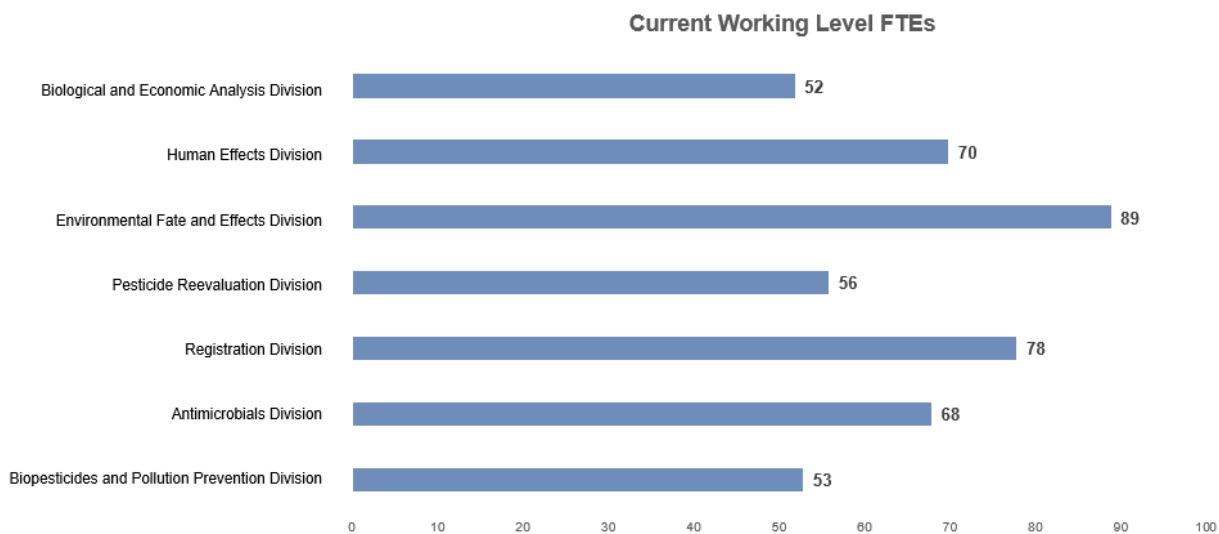


Figure 10: Chart showing the FY25 working level FTEs in each OPP division.

The team then calculated the number of FTEs required in each steady state scenario based on forecast volumes and anticipated efficiency gains for the low, medium, and high scenarios. We also calculated the FTEs that would be required in a no-change scenario, assuming that volumes remained steady, and no efficiency gains were realized. Figure 10 below shows how FTE needs compare across the defined scenarios.

Key Findings

Across all modeled steady state scenarios, projected workforce needs exceed the FY25 FTE baseline, indicating a consistent capacity gap under a range of plausible operating conditions. While the magnitude of the shortfall varies (from approximately 24 in the low scenario to 200 in the very high), each scenario presents meaningful risks to OPP’s ability to meet PRIA timelines, respond to industry needs, and prevent further backlog accumulation. Even under more favorable assumptions, existing staff would be required to sustain elevated workload expectations with limited flexibility to absorb variability

or focus on longer-term improvements. Taken together, these results suggest that maintaining program performance and workforce sustainability will likely require additional staffing, further efficiency gains beyond those identified in the BPR report (which may be unrealistic and/or require significant investment), or a combination of both.

The chart below summarizes the total FTEs required in each scenario, adding together the working level, IO, and managerial FTEs. Each bar represents the difference from the total FTEs in FY25 to the total FTEs needed in each steady state scenario is shown by the lighter color bar. The total FTEs needed to maintain performance in that scenario are summed next to each bar.

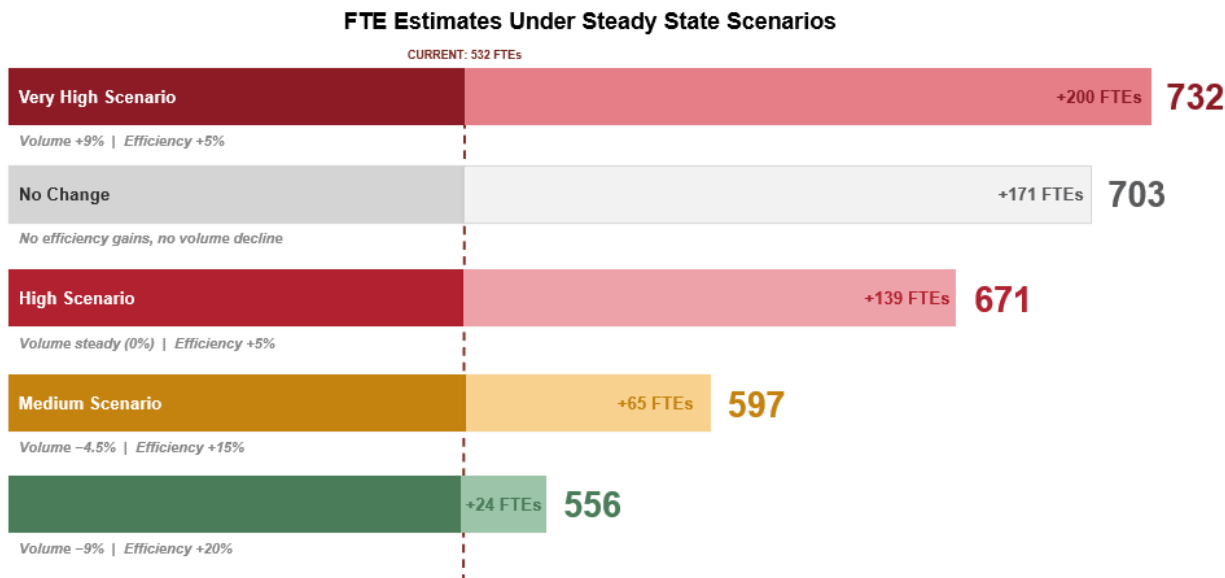


Figure 11: Chart showing the FTEs required under each steady state scenario.

These results indicate that consistently meeting the regulatory timelines in PRIA 5 will require more FTEs over the long term. Even in the best-case scenario (which assumes that OPP implements all the recommended improvements from the BPR to realize a 20% efficiency gain in its processing capacity and volumes continue to decrease at a high rate), OPP would need to hire roughly 24 new FTEs to keep pace with incoming actions, for a total workforce of 556. Without these additional FTEs, OPP will not have a sufficient workforce to process the actions on time, and the backlog would be expected to grow. These FTEs would be solely focused on completing incoming actions, and additional surge support would still be needed for OPP to have sufficient capacity to begin processing the backlog.

While this **low** scenario gap is smaller than in other scenarios, it still suggests limited capacity to consistently meet statutory review timelines and respond to industry needs without tradeoffs. In this environment, maintaining performance would require continued prioritization of time-sensitive or high-complexity actions, placing sustained pressure on existing staff and leaving little margin to absorb any variability in the workload. Without targeted mitigation efforts to improve processing times or capabilities, even a modest shortfall could contribute to incremental backlog growth over time.

In the **medium** scenario, under which we assume OPP sees moderate efficiency gains of 15% and where the incoming volume of submissions decreases less dramatically than in the low scenario, we forecast a shortfall of nearly 65 FTEs from the current state, with a required total workforce of 597 FTEs. This indicates a more pronounced misalignment between workload demands and available capacity. At this level, OPP would face increased risk of missing statutory timelines and delaying industry decisions,

particularly during periods of elevated submissions. Backlog reduction efforts would be difficult to sustain, and existing staff would be required to operate under consistently high workload expectations, increasing the risk of burnout, attrition, and further productivity impacts.

Under the **high** scenario, the analysis shows an estimated shortfall of approximately 139 FTEs, representing a substantial capacity gap. The total required FTEs in this scenario are 671, compared to the FY25 FTE count of 532. Here, we assume FY25 volumes are constant with FY25 incoming submission volumes, and no further efficiency gains beyond those implemented in FY26 occur, meaning OPP realizes a 5% efficiency gain. In this case, OPP would be unlikely to meet statutory requirements or industry expectations without significant delays, and the backlog would persist or grow. Staff would face elevated workload pressures, limited opportunities for training, process improvement, or quality enhancement. Over time, this scenario poses risks not only to program performance but also to workforce sustainability and organizational resilience.

The **no-change** scenario, in which the FTE shortfall grows to 171, is the most unlikely since process improvements are already underway that will result in at least some efficiency gains in the steady state and volumes have been steadily decreasing. The projected 703 FTE requirement will only occur if efficiency is lost and process improvements rolled back, or incoming submission volumes increase, a significant departure from the trend over the last five years.

The **very high** FTE scenario shows the greatest gap with 200 FTEs, with a total of 732 total FTEs required to process incoming submissions if volumes increase by 9% and efficiency gains are at 5%. While the data for this scenario is not conclusive and based on preliminary findings, it represents the largest potential shortfall for OPP. If the assumptions here come true, OPP would face serious risks in meeting PRIA timelines, frustrating registrants and placing unrealistic demands on existing staff.

4.3 Division Level FTE Needs and Gaps

Overview

This section presents the steady state results at the division level, highlighting how workforce impacts vary across divisions and scenarios. While the aggregate OPP analysis shows overall FTE shortfalls, division-level results reveal a more nuanced picture, with some divisions experiencing larger gaps and others showing relative balance or localized surpluses depending on scenario assumptions. This breakdown provides additional insight into where capacity pressures are most acute and where targeted adjustments may be needed to better align staffing with workload demands. This analysis remains focused on steady state FTE needed to process incoming submission volumes and does not incorporate the surge support needed to process the existing backlog (see Section 4.4 for analysis of the backlog).

To gauge the FY25 divisional workload, we estimated the level of effort required to complete the actions each division receives in a year based on FY25 data. Figure 12 shows how the workload compares across divisions.

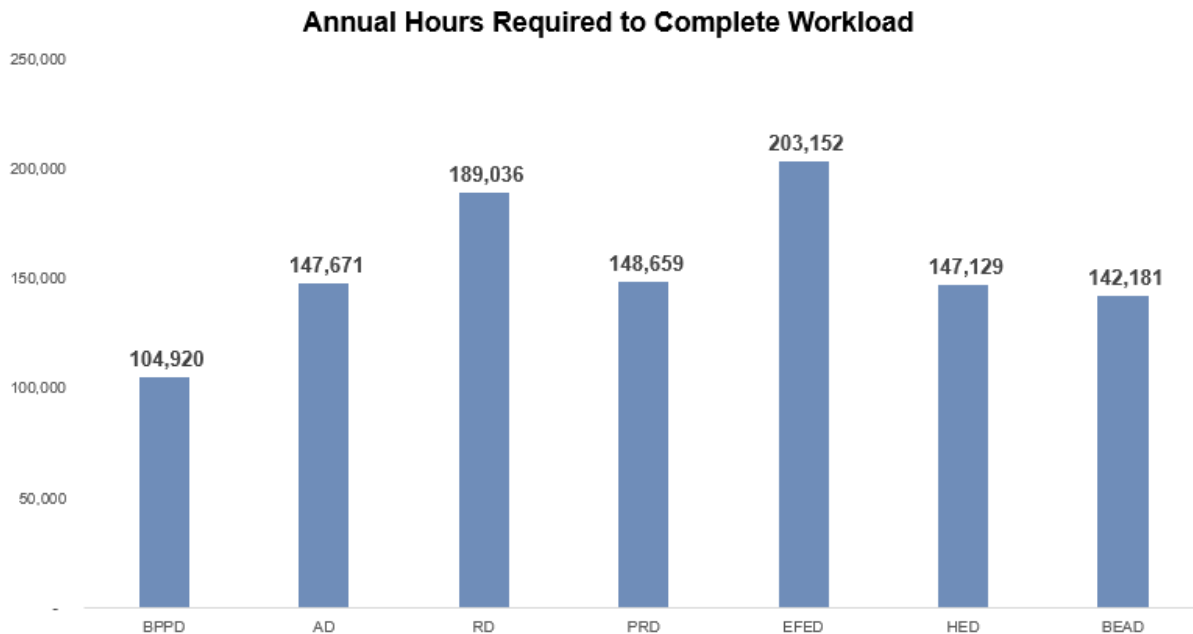


Figure 12: Chart showing the hours needed to complete the annual workload in each division.

The division level breakdown of FTEs required in each scenario is displayed in the figure below. The table compares the FTEs needed to complete the anticipated workload on time in each steady state scenario to the current FTE count as of FY25, indicating if there would be a surplus or shortfall of FTEs.

Division	Current State	Potential Steady State Scenarios				
	Current Working Level FTEs	Low Scenario Gap (Surplus / Shortfall)	Med Scenario Gap (Surplus / Shortfall)	High Scenario Gap (Surplus / Shortfall)	Very High Scenario Gap (Surplus / Shortfall)	No Change Scenario Gap (Surplus / Shortfall)
BPPD	53	▲ 6.9	▲ 2.3	▼ -5.6	▼ -11.5	▼ -8.7
AD	68	▲ 2.3	▼ -3.8	▼ -14.5	▼ -22.8	▼ -18.9
RD	78	▼ -3.9	▼ -12.8	▼ -27.6	▼ -38.2	▼ -33.2
PRD	56	▼ -12.4	▼ -17.5	▼ -27.1	▼ -35.4	▼ -31.4
EFED	89	▼ -4.8	▼ -11.6	▼ -24.5	▼ -35.9	▼ -30.5
HED	70	▲ 2.6	▼ -2.6	▼ -12.2	▼ -20.4	▼ -16.5
BEAD	52	▼ -14.3	▼ -18.8	▼ -27.5	▼ -35.4	▼ -31.6
Total	466	▼ -20.7	▼ -62.6	▼ -138.4	▼ -199.6	▼ -170.9

Figure 13: Table showing division-level breakdown of FTEs required in each scenario.

Overall Findings

Across all scenarios, the divisions show a varying distribution of workforce capacity, with most experiencing a persistent shortfall. Only one division, BPPD, shows any net surplus in a potential scenario, and those surpluses are modest – approximately 2 to 7 FTEs – relative to the scale of shortfalls seen elsewhere. Six of the eight divisions experience substantial FTE shortfalls, with the most significant shortfalls seen in the very high scenario. The medium scenario shows an average shortfall of 11 FTEs for these six divisions (AD, RD, PRD, EFED, HED, and BEAD). This finding is consistent with insights

gathered from the BPR report, where staff reported structural workforce challenges and chronic understaffing as key contributing factors to difficulties in meeting deadlines.

Of all the divisions, PRD and BEAD show the most consistent and greatest shortfalls across scenarios, averaging 12-35 FTEs under each set of assumptions. This is not due to an abnormally high workload for these divisions, as Figure 9 shows that in fact RD and EFED have larger workloads. Since volume and efficiency gains are assumed to be consistent across divisions, we can infer the large forecasted gaps for PRD and BEAD are due to similarly large capacity gaps at present. Thus, adding capacity in these two divisions is likely to be valuable in meeting statutory timelines and preventing backlog growth, regardless of which scenario prevails.

As assumptions get less favorable, RD shows the greatest gap between the current state FTE needs and the scenario-specific FTE requirements. While this division always shows a shortfall, the magnitude of this shortfall is relatively modest in the low scenario but becomes the largest in high and very high scenarios. The implication here is that RD is highly sensitive to changes in workload volumes and less easily offset by efficiency gains compared to other divisions. As overall workload increases, RD's gap expands faster than other divisions, meaning it has less flexibility to absorb increases in submissions or slower than expected process improvements. This makes it a strong candidate for prioritized staffing or targeted efficiency initiatives.

Taken together, the division-level results across all four scenarios show that workforce impacts are unevenly distributed and vary significantly as assumptions about efficiency and volume change. While the low scenario presents a mixed picture with limited opportunities for rebalancing across divisions, the medium scenario shows fewer and smaller surpluses with more widespread shortfalls, and the high scenario reflects near-universal capacity gaps across divisions. The very high scenario that assumes a volume increase further exacerbates these capacity gaps with even greater shortfalls. Throughout all scenarios, surplus capacity is modest and shortfalls persist in multiple divisions, limiting flexibility to adjust to changing environments and increasing operational risks. These findings highlight that a "one size fits all" approach is inadequate, and division-specific workforce strategies will be needed.

Scenario-Specific Findings

Scenario 1 – Low FTEs

Scenario 1 predicts the lowest number of required FTEs, assuming incoming volumes decrease by 9% and the maximum efficiency gain of 20% from the BPR report is realized. Figure 14 shows the division-level breakout of FTEs required under this scenario, comparing it to the FY25 FTE count for each division.

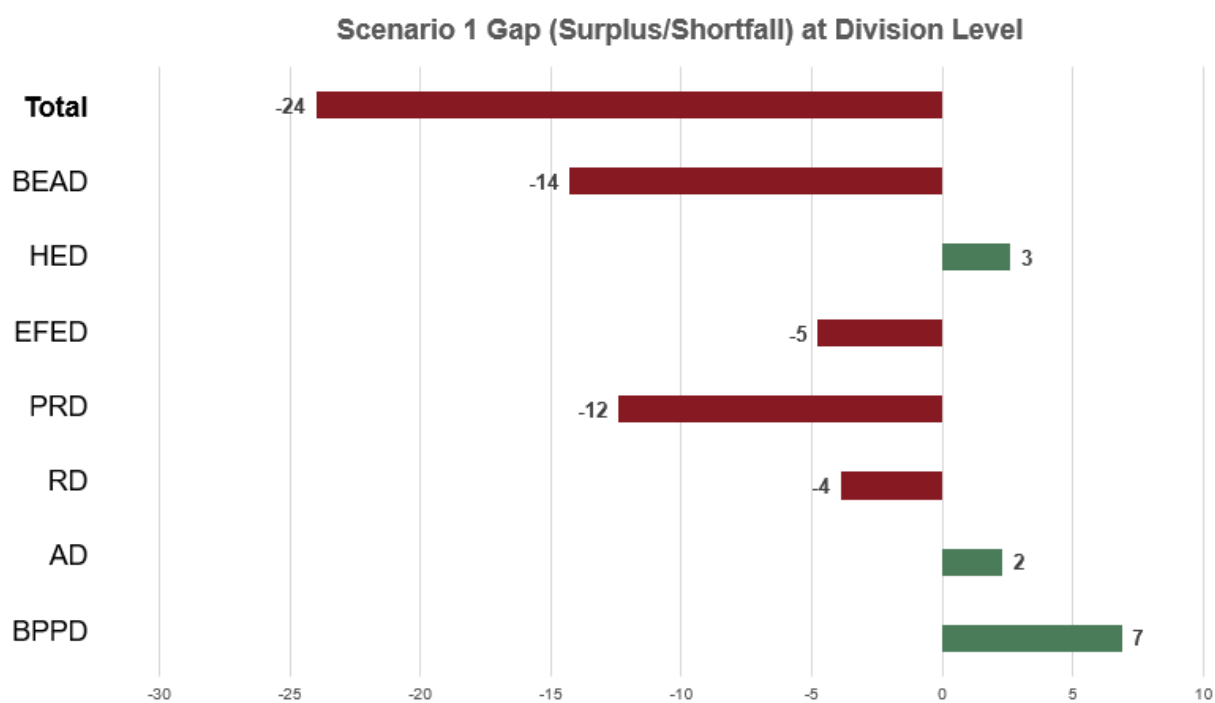


Figure 14: Chart showing division-level FTEs gap/surplus in low FTE scenario. Red represents gaps, green surplus.

In the low FTE scenario, the division-level results show a mixed picture regarding overall capacity. Three divisions (BPPD, AD, and HED) show a moderate FTE surplus, ranging from 2 FTEs in AD to 7 FTEs for BPPD. This suggests limited additional flexibility under lower workload volume and higher efficiency assumptions. These divisions would be able to respond to any surges in demand without compromising performance and could allocate more time to process improvement efforts or potentially support other divisions. In contrast, four divisions (RD, PRD, EFED, and BEAD) face FTE shortfalls, ranging from approximately 4 to 14 FTEs with an average of 9 FTEs, indicating that capacity pressures persist even in the most favorable scenario. If these assumptions for the steady state hold true, OPP would have 95% of the staff needed to process incoming submissions on time, requiring a minimum of 24 new FTEs to prevent backlog growth and avoid increased pressures on existing staff.

The low scenario is unlikely to materialize in the near-term, as it relies upon achieving substantial efficiency gains. Fully implementing the planned process improvements, automation initiatives, and IT modernization efforts will require sustained time and investment before their benefits are fully realized. While a 20% efficiency gain is theoretically achievable, it represents an ambitious target and effectively sets the lower bound of projected steady state FTE needs – one that is unlikely to be reached in the near-term.

Scenario 2 – Medium FTEs

Scenario 2 shows the medium FTE scenario, assuming incoming volumes decrease by 4.5% and the maximum efficiency gain of 15% from the BPR report is realized. Figure 15 shows the division-level breakout of FTEs required under this scenario in comparison to the FY25 FTE count for each division.

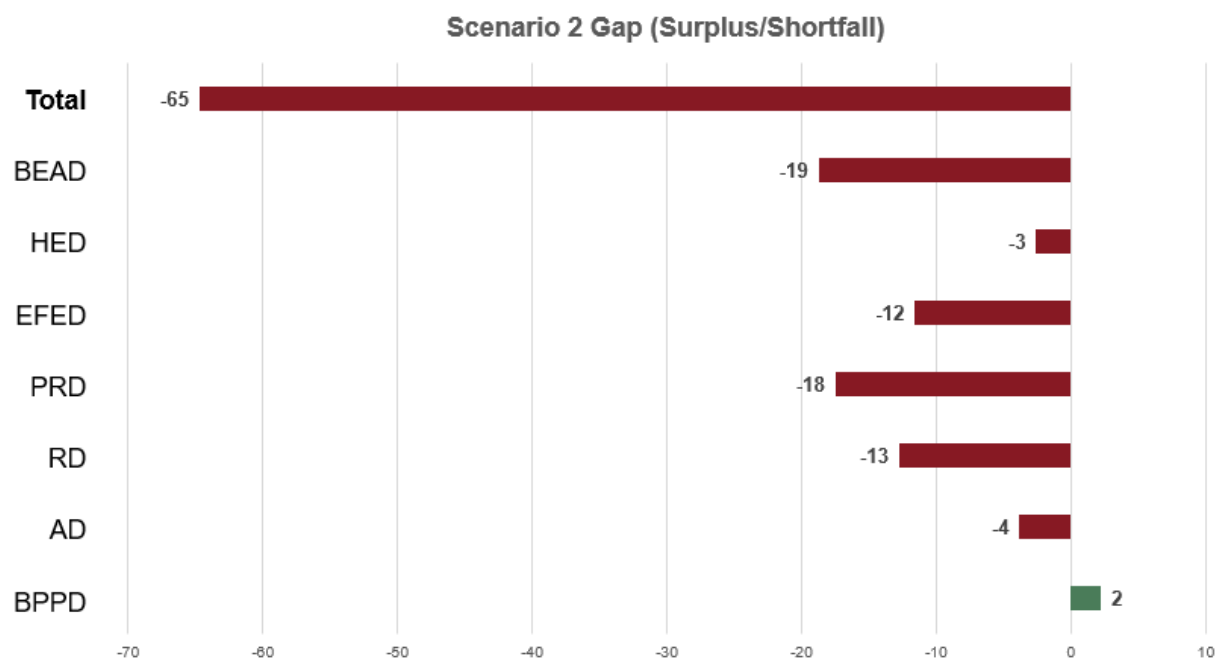


Figure 15: Chart showing division-level FTEs gap/surplus in medium FTE scenario. Red represents gaps, green surplus.

Compared to the low scenario, the medium scenario showed only one division with any surplus capacity, and this surplus is small (approximately 2 FTEs). The remaining divisions experience shortfalls, ranging from roughly 3 FTEs at HED to 19 FTEs at BEAD, suggesting that capacity constraints are more widespread and less easily offset through internal rebalancing. On average, divisions in this scenario would see a shortfall of 8 FTEs, a gap that means OPP would only have 88% of the FTEs required to maintain the predicted incoming submission volume.

Scenario 3 – High FTEs

The high scenario is more conservative, assuming no additional process improvements are made other than those currently in progress for a total efficiency gain of 5%, and that volumes stay consistent with FY25 levels. Figure 16 explores the division-level breakout of required FTEs in this scenario relative to FY25 FTE counts at each division.

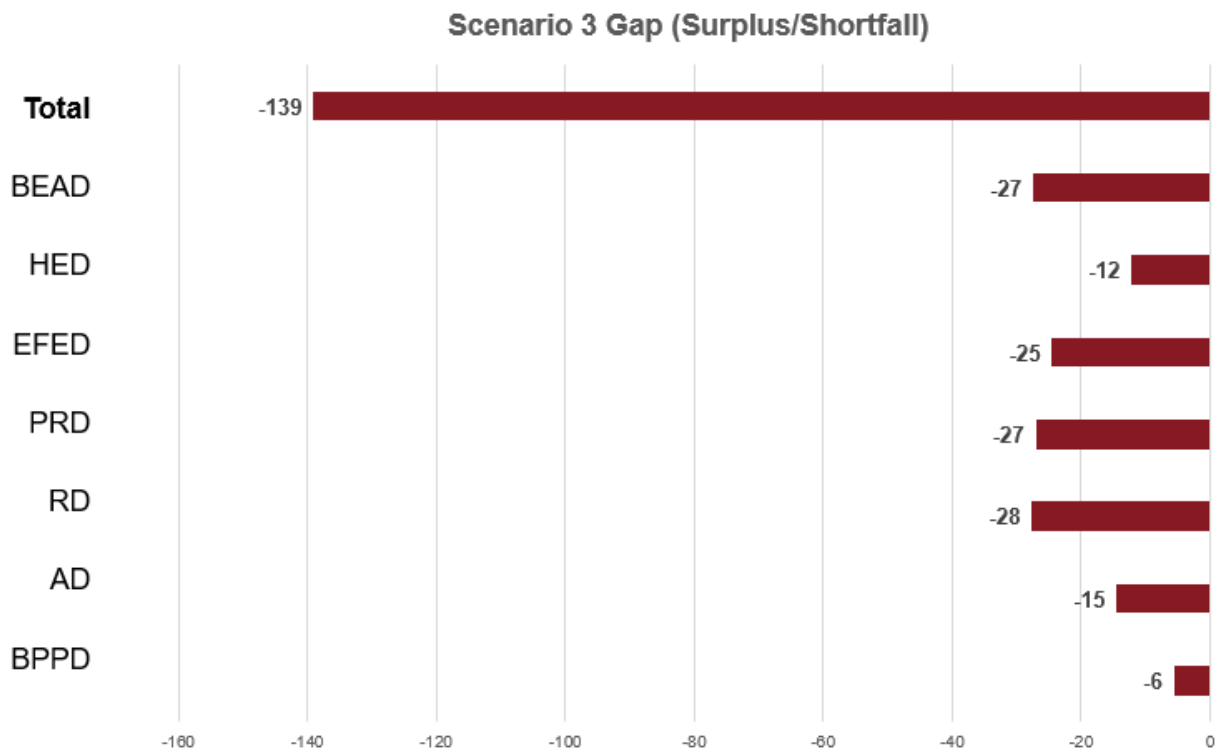


Figure 16: Chart showing division-level FTEs gap/surplus in high FTE scenario. Red represents gaps, green surplus.

The high FTE scenario shows pervasive capacity constraints across the divisions. All divisions experience FTE shortfalls. The divisions face substantial shortfalls ranging from roughly 6 to 28 FTEs, with an average shortfall of about 20 FTEs per division. Under this scenario, OPP would have only 77% of the staff required to process the incoming volume of submissions on time. This indicates a broad and systemic mismatch between workload demands and available staffing under these assumptions. Regulatory and science divisions would face significant challenges in meeting statutory timelines and industry expectations, and backlog growth would be unavoidable.

Overall, the high FTE scenario division breakout highlights a structural capacity shortfall rather than localized imbalances. The results suggest that without meaningful increases in staffing levels across the divisions, substantial additional efficiency gains, or both, OPP would have limited ability to keep pace with the incoming flow of submissions, adapt to workload changes, or ensure long-term workforce sustainability under these conditions.

Scenario 4 – Very High FTEs

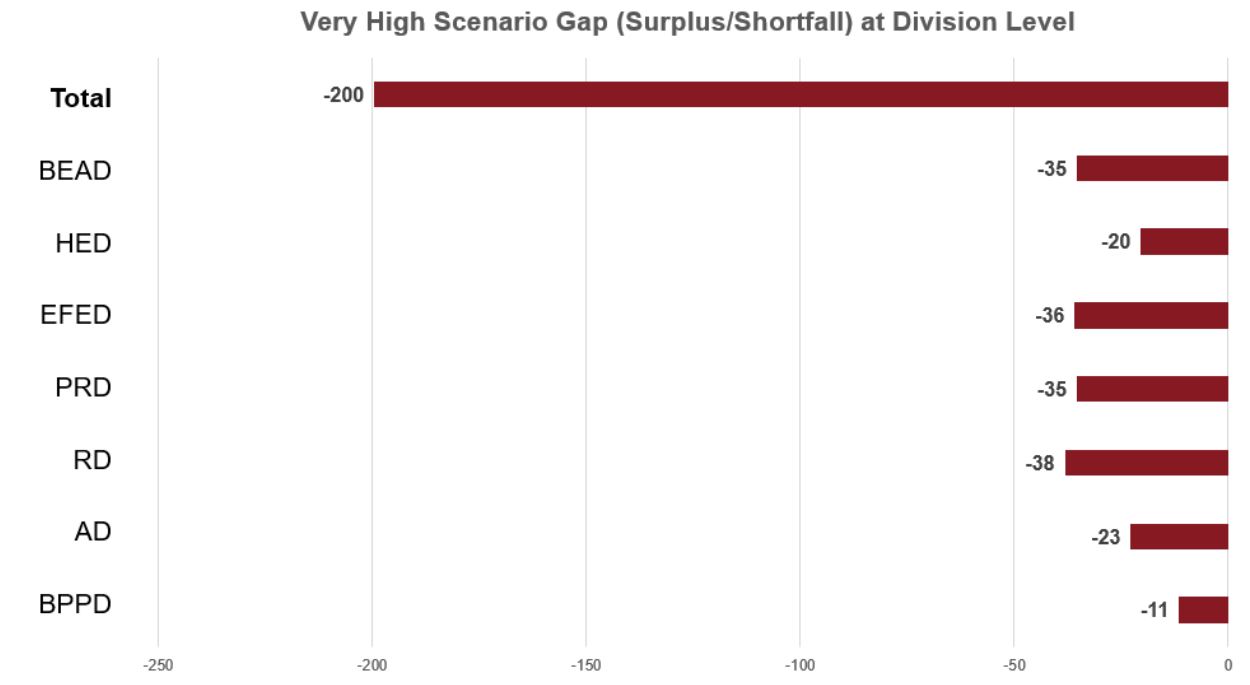


Figure 17: Chart showing division-level FTEs gap/surplus in very high FTE scenario. Red represents gaps, green surplus.

In the very high FTE scenario, all divisions face an FTE shortfall. The divisions see much larger shortfalls than in the other scenarios, ranging from 11 FTEs to 38 FTEs. RD faces the greatest shortfall, followed closely behind by EFED, BEAD, and PRD. In this scenario, OPP would have only 70% of the working level staff needed to process incoming submissions on time. If this scenario holds true, OPP would face serious difficulty in maintaining performance under the existing staffing levels. Actions would be delayed, registrant communication less frequent, and the backlog would continue to grow at the fastest rate of any other projected scenario.

There is no robust evidence of an increase in incoming submission volumes³. Nevertheless, it remains a possibility in OPP’s future, and if this does come to pass, OPP will need a large hiring effort to have sufficient capacity to meet statutory deadlines.

Implications

Several broader implications emerge from the steady state scenario analysis. First, even under the most favorable assumptions, the modest size of the identified FTE surpluses and the presence of ongoing shortfalls among most divisions indicate a limited margin for error. Small shifts in submission volumes, staff availability, or processing efficiency could quickly strain capacity and impact OPP’s ability to process actions in a timely manner. Large changes could mean more submissions end up in the backlog or face processing delays, with either outcome leading to more registrant frustration and endangering OPP’s ability to meet PRIA requirements.

³ Incoming submission data goes back to FY20, and the data shows a persistent decrease year over year for both PRIA and non-PRIA actions. While there is no historic evidence that points to a potential increase in submissions, preliminary FY26 data shows it may be possible.

Second, though reallocating staff across divisions may help to address localized gaps, doing so introduces operational complexity. Staff often have specialized skillsets that are difficult to transfer from one division to another, so any shifts would need to account for skill alignment and operational feasibility to not leave gaps in the original division's ability to process actions on time. Differences in subject-matter expertise, training requirements, and statutory responsibilities may constrain how easily staff can be redeployed, and active rebalancing would require additional management coordination and insight. Opportunities for reallocation are limited and, in some scenarios, infeasible, as the small surplus capacity may lack the specialized skillset required to take on the workload from other divisions.

Finally, division-level imbalances raise risks related to both program performance and workforce sustainability. Uneven capacity can lead to inconsistent timeliness or service levels across divisions, and persistent shortfalls may continue to place elevated demands on affected staff, with potential implications for morale, retention, and long-term productivity. As a result, divisions facing larger gaps, like BEAD and PRD, may encounter increased difficulty meeting statutory timelines and responding to industry needs without sustained workload pressure on existing staff. Other divisions, like RD, may be more sensitive to shifts in incoming volume submissions, and less easily offset by efficiency gains. This represents an operational risk under higher demand conditions, with implications for processing actions on time, managing staff workload, and preventing further backlog accumulation.

These dynamics heighten the risk of backlog growth and further reduce OPP's ability to absorb variability in submission volumes or operational disruptions.

4.4 Backlog Clearance Needs

Overview

OPP has implemented a holistic strategy to reduce the number of applications currently in its backlog and to prevent future backlog growth, yet it still has a sizeable backlog despite these efforts. This section reviews the results of the backlog analysis, showing how many FTE would be needed to eliminate the backlog as it stands by FY25, assuming sufficient staffing to address new incoming actions. To determine the number of additional FTEs that would be required to completely address the backlog, this assessment considered the current volume of actions that were in the backlog as of December 2025, including PRIA, non-PRIA, and registration review cases. All divisions who currently have items in the backlog were included in this analysis⁴.

Between limited FTEs and a surge in incoming submissions in 2021, OPP has struggled to complete new PRIA and non-PRIA actions on time while also addressing overdue backlog actions. The priority has historically been on completing new actions by the PRIA 5 deadlines, meaning the backlog continued to grow. In recent years, efforts to strategically reduce the backlog through a variety of initiatives to streamline processes and allocate resources dedicated to backlog reduction efforts have enabled OPP to make strides in reducing the size of the backlog, particularly for non-PRIA actions.

The registration review process shows a similar story, though with additional complications. Registration review is a long and complex process spanning years and requires inputs from not only various OPP divisions but also from external agencies and registrants. Delays from these external factors result in a large backlog on OPP's side, as the review may be put on hold until all inputs are received. Opportunities for improvement within OPP's registration review process remain and capacity to complete these

⁴ IO was not included in the backlog analysis, as this division does not directly work on any PRIA, non-PRIA, or registration review cases that are in the backlog.

complex reviews can be improved, but the backlog is unlikely to be eliminated through process or technology improvements alone.

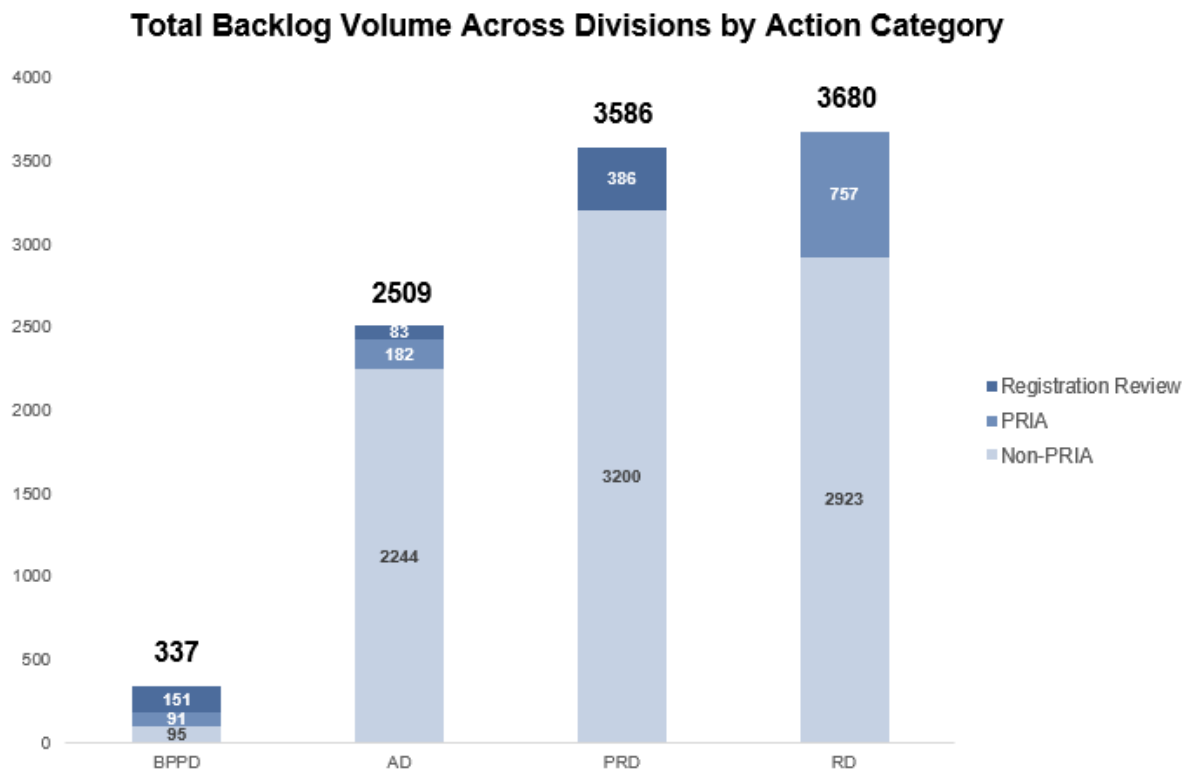


Figure 18: Chart showing division-level breakdown of the total backlog volume by action category.

Figure 18 shows the total backlog volume across the regulatory divisions, summarizing all PRIA, non-PRIA, and registration review cases beyond their original deadline for each division. The regulatory divisions are responsible for the final completion of each backlog item, though some RD-owned PRIA actions and PRD-owned registration review cases have components that are handled by the science divisions. BPPD shows the lowest volume, as this division receives fewer incoming submissions comparatively. The total backlog across divisions is comprised of more than 12,000 cases that are past their original due date.

The backlog analysis is grounded in several core assumptions. First, it assumes the backlog is stabilized by providing sufficient permanent staff to process incoming applications in the steady state, thereby preventing additional backlog accumulation. Second, temporary surge staff and/or contractor support are added specifically to reduce the existing backlog, separate from steady state operations. The analysis is structured around OPP’s goal of eliminating the backlog by the end of FY29. It assumes FY26 is dedicated to planning, hiring, and onboarding surge staff, with no backlog processing occurring during that year. Backlog execution would begin in FY27, with productivity ramping up during the first year and reaching full efficiency in FY28 and FY29 to achieve elimination within the target timeframe. Efficiency gains in the model are represented through adjustments to effective productive hours (the denominator in the FTE calculation), rather than applying a separate efficiency multiplier, allowing productivity improvements to be directly reflected in annual FTE capacity assumptions.

The analysis also assumes that surge support staff is fully dedicated to processing the backlog of PRIA, non-PRIA, and registration review cases. All incoming actions would be processed by FTEs hired to maintain steady state performance, according to the scenario that materializes, who would prevent further backlog accumulation. The amount of training, administrative activities, and other miscellaneous work would be minimized, allowing the staff to prioritize the mission-critical work of implementing PRIA 5.

Key Findings

Clearing the existing backlog volume by FY29 is expected to require significant surge support, with a total of 521 FTEs needed to address all PRIA, non-PRIA, and registration review cases in the backlog. Most of this effort would go toward the registration review backlog, which comprises 66% of the total backlog workload. If OPP prioritizes completing the PRIA and non-PRIA backlog of actions first, this would require a total of approximately 162 FTEs. This approach would be in line with industry preferences, as key business decisions rely upon PRIA and non-PRIA decisions and registration review timelines are generally less of a concern.

PRD requires the most FTEs to clear the backlog, as its backlog is primarily composed of registration review cases which are on average more time-consuming and complex than non-PRIA and PRIA actions. This anticipated work includes completing draft risk assessments, registration review labels, and completing registration review decisions. In contrast, BPPD requires the fewest, as the total backlog in this division is much smaller than the rest.

If OPP is to clear the backlog by the end of FY29, it must take immediate action. Success requires timely hiring/contracting, sufficient training capacity, and effective onboarding in FY26 and FY27. Any delays in these areas would reduce productive time during the execution period and increase the risk that the backlog cannot be fully cleared within the planned timeframe.

Action Category Analysis

Figure 19 displays the forecast number of FTEs required by fiscal year to clear the backlog for PRIA, non-PRIA, and registration review cases by the end of FY29.

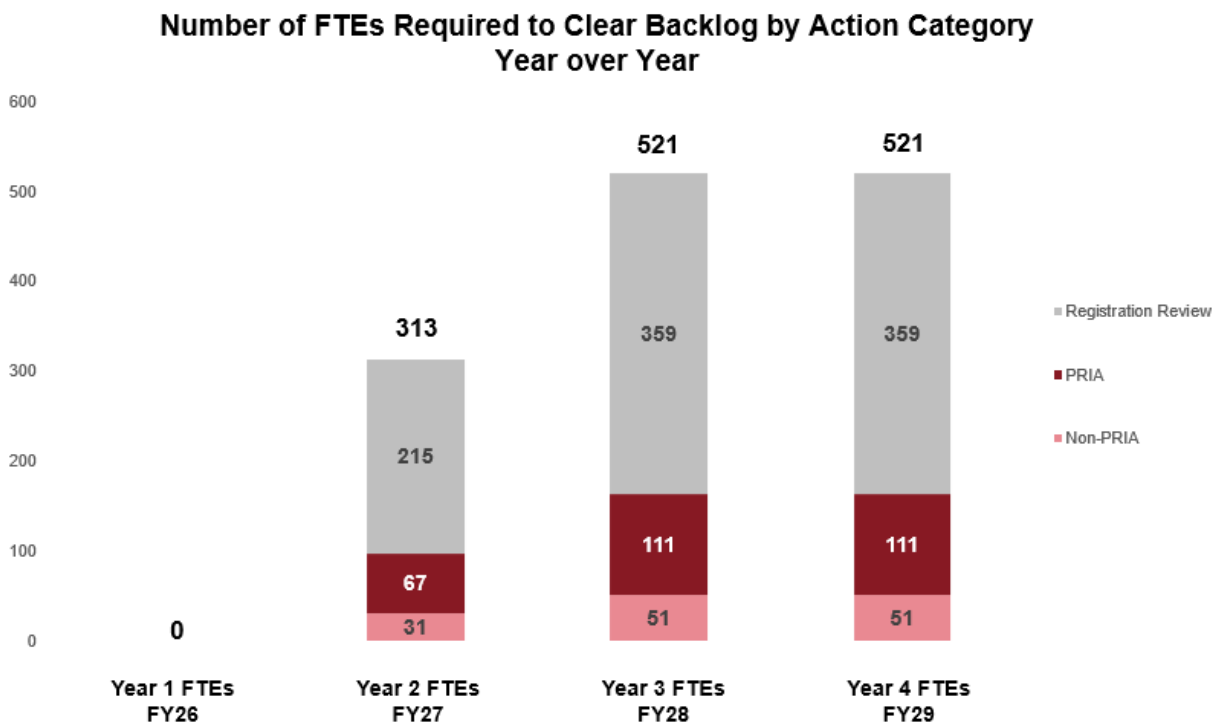


Figure 19: Chart showing FTEs required to clear the backlog from FY27 to FY29 by action category.

This view shows that most of the surge support FTEs would be allocated to working on the registration review backlog, which accounts for two-thirds of the FY25 backlog workload. The registration review process is often complex and resource intensive, and new analysis requirements incorporated into the traditional process such as the endocrine disruptor screening program (EDSP) have only added to the assessments that OPP staff must complete. The complexity of this process along with the reliance on inputs from both registrants and external agencies like the U.S. Fish and Wildlife Service who are required for the Endangered Species Act (ESA) make it difficult for the FTEs to complete the process on schedule.

The implications for this workforce assessment mean that even if OPP were to hire 359 FTEs to assist with the registration review backlog, those FTEs would be hard-pressed to fully complete the backlog of actions on their own. At best, this influx of FTEs would enable OPP to complete its individual portion of the registration review process and the assessments where the data is readily available to ideally reach an interim decision. As a final decision requires all risk, benefit, EDSP, and ESA assessments to be finished, a backlog of registration review cases relying on external inputs will likely persist despite OPP’s reduction efforts.

On the other hand, if OPP were to prioritize reducing the PRIA and non-PRIA backlogs, they could likely eliminate those backlogs with much lower number of surge staff (approximately 111 FTEs for the PRIA backlog and 51 for the non-PRIA backlog). Once the PRIA and non-PRIA backlogs are fully addressed, staff could then be repurposed to working through the registration review backlog, as the review processes between PRIA and non-PRIA review and the processes for registration review have a lot of overlap and would require limited additional training. This approach would involve a degree of retraining and an adjustment period as FTEs switch focus, but it would be more in line with industry priorities and

would enable OPP to show demonstrable results sooner by completing a large portion of the backlog, fulfilling legislative requirements, and improving registrant satisfaction.

Division Level Analysis

Figure 20 shows how many FTEs would be required to complete the FY25 backlog volume at the division level, for all action categories. The number of FTEs required to process the backlog each year are represented by the colored columns with values calculated on the left-side y-axis, and the total backlog volume processed each year is represented by the black line and the right-side y-axis.

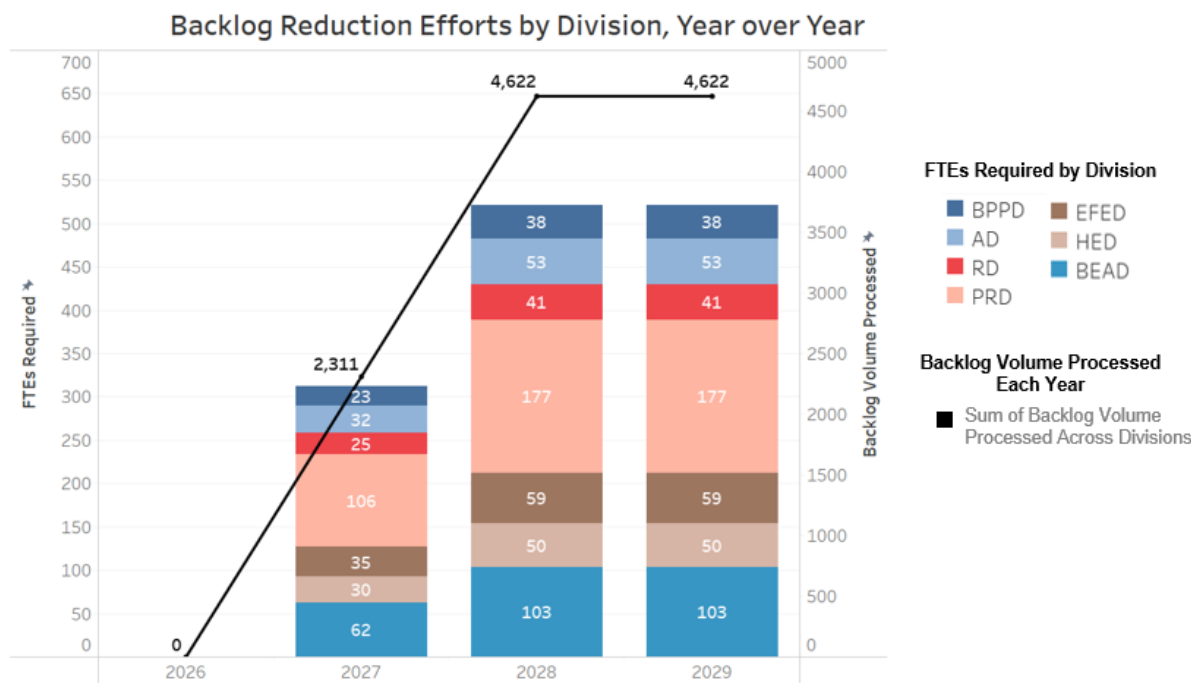


Figure 20: Chart showing surge FTEs required to clear the backlog from FY27 to FY29 by division.

FY27 would require approximately 313 FTEs devoted entirely to the backlog, with an increase to 521 FTEs in FY28 and FY29 once the new staff are fully onboarded and trained. This analysis accounts for both a rolling training and ramp-up period as well as the reduced productivity of newly hired staff, enabling the backlog to be cleared within the desired timeframe.

PRD requires the most FTEs to clear the backlog, as its backlog is primarily composed of registration review cases which are on average more time-consuming and complex than non-PRIA and PRIA actions. In contrast, BPPD requires the fewest, as the total backlog in this division is much smaller than the rest.

Implications

Clearing the backlog by the end of FY29 is an ambitious goal demanding prompt action and efficient execution. Success will require timely hiring, sufficient training capacity, and effective onboarding in FY26 and FY27. Any delays in these areas would reduce productive time during the execution period and increase the risk that the backlog cannot be fully cleared within the planned timeframe.

There are also broader operational and workforce implications. The scale of the surge effort, up to 488 FTEs, will require sustained funding over multiple years and may place additional demands on existing staff, whose experience may be needed to train, mentor, and oversee new hires. Note that the potential

impact on the action processing capacity of existing staff involved in training surge staff has not been incorporated into this version of the model, but the impact could be significant depending on the amount of surge staff onboarded and the timeline for onboarding them.

Another consideration is the importance of transition planning. As backlog volumes diminish, OPP will need to determine how surge staff are redeployed, absorbed into steady state operations, or phased down in a way that preserves institutional knowledge and avoids creating new workforce imbalances.

Altogether, the results show that backlog elimination is achievable but will require coordinated planning across staffing, operations, and funding to manage both near-term demands and longer-term workforce sustainability.

5. Conclusions and Next Steps

This section presents the conclusions of the workforce assessment and a phased roadmap for translating findings into sustained action. The graphic below frames the four phases of work required to move from a completed baseline assessment to a fully institutionalized, self-sustaining workforce planning capability at OPP.

The figure below also illustrates how the workforce assessment does not operate in isolation. OPP is simultaneously implementing the 79 recommendations from the BPR report, a parallel effort that directly shapes workforce needs over time, as process efficiencies are realized.

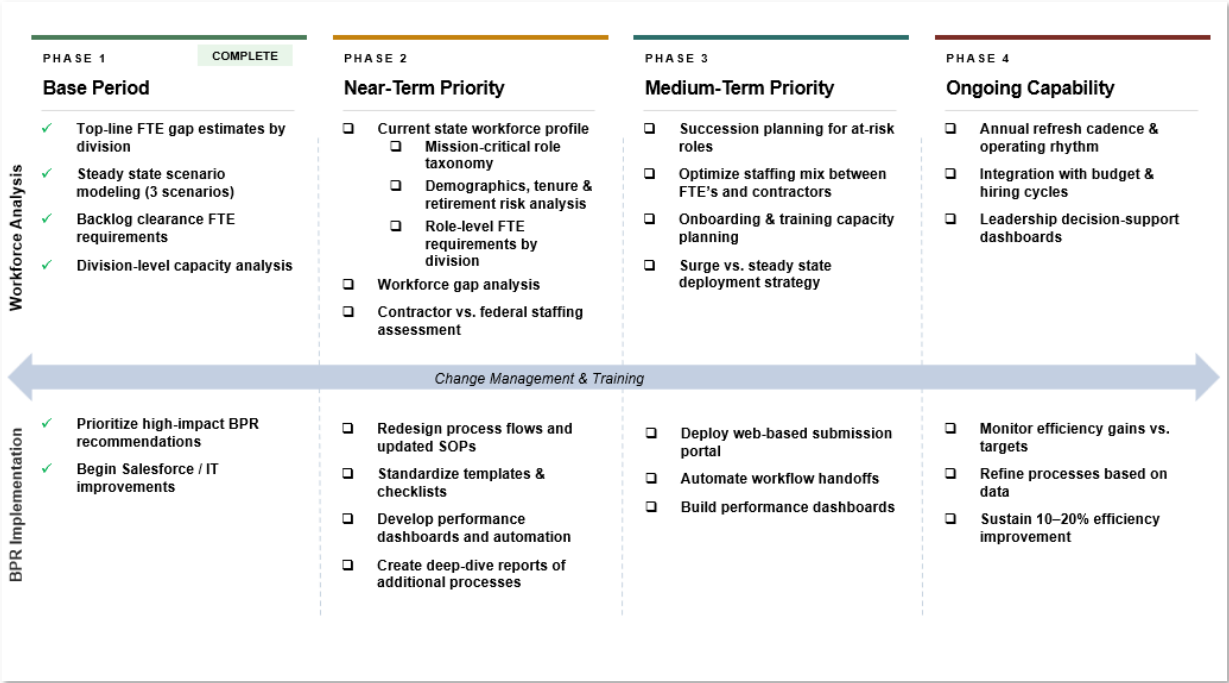


Figure 21: Outline of proposed recommendations for next steps after the workforce assessment.

5.1 Phase 1: WFA Assessment Conclusions

Capacity Gaps Persist Across All Scenarios

The steady state scenarios show broad FTE shortfalls relative to FY25 staffing levels across all modeled conditions. Division-level results reveal uneven impacts, with some divisions facing larger and more persistent gaps while opportunities for internal rebalancing are limited. Even under the most favorable assumptions (a 20% efficiency gain and declining submission volumes) OPP would still need to hire a minimum of 24 additional FTEs to keep pace with incoming work. Under more conservative assumptions, that shortfall rises to approximately 200 FTEs.

Actions Required to Eliminate Backlog and Reduce Delays

Clearing the backlog by the start of FY30—OPP’s stated goal—will require a separate, dedicated surge workforce above and beyond the FTEs needed for steady state operations. The analysis estimates that between 391 and 488 surge FTEs would be needed during the FY27–FY29 execution window.

OPP should consider aligning its hiring and surge deployment with PRIA commitments. Prioritizing the PRIA and non-PRIA backlogs before moving to registration review will deliver demonstrable progress sooner, fulfill legislative requirements, and improve registrant satisfaction. Once those backlogs are addressed, surge staff can be redeployed to registration review, though full clearance will depend in part on inputs from external agencies beyond OPP’s control.

Workforce Insights Must Be Sustained, Not Static

This assessment provides a critical snapshot, but it also exposed long-standing gaps in OPP’s ability to forecast incoming submissions, quantify workload by action type, and plan staffing accordingly. Maturing OPP’s approach to workforce planning is a prerequisite for capitalizing on the investments already made in process improvement, systems, and training. By grounding staffing decisions in reliable data and rigorous analysis, OPP can anticipate future needs, reduce the risk of recurring backlogs, and avoid overburdening teams that are already constrained.

5.2 Phase 2: Workforce Deep-Dive

While this assessment provides division-level FTE estimates to inform budget requests and initiate planning, the full scope of workforce analysis envisioned under PRIA 5 extends further. The statute calls for a comprehensive view of the workforce implementing PRIA 5—including mission-critical occupations, demographic and background characteristics, staffing workload, retirement eligibility, turnover, recruitment, and retention dynamics—as well as recommendations to identify adequate staffing levels, best practices, and areas for improvement.

Fully meeting this requirement will require further analysis, leadership commitment, and a deliberate strategy to move OPP from its FY25 baseline toward a sustainable future workforce. Table 2 below summarizes five priority areas for further analysis, their key activities, and their relevance to PRIA 5.

Analysis Area	Key Activities	Relevance to PRIA 5
Role-based Staffing Model	Develop role definitions, map competencies, estimate LOE by role and action type, estimate FTEs by role and division	Analysis on staffing levels across mission-critical occupations
Demographic Analysis & Succession Planning	Analyze tenure, retirement eligibility, turnover rates, and attrition risk by division and role	Addresses PRIA 5 requirement for demographic and retirement risk assessment
Competency Assessment	Map existing vs. required skill levels; identify training gaps and cross-training opportunities	Informs targeted training strategies to sustain mission capacity
Contractor & Staffing Mix Analysis	Assess organizational structure and talent ecosystem including contractor support; model cost-risk tradeoffs for different configurations	Supports recommendations on adequate staffing levels and use of outsourced support

Table 2: Recommended future analyses mapped to PRIA 5 statutory requirements.

Role-Based Staffing Model

Developing a taxonomy of mission-critical occupations (e.g., regulatory risk managers, science reviewers across disciplines, economists, label reviewers, and project coordinators) would define the precise competencies, tasks, and behaviors required for each role. This level of specificity enables more accurate

FTE estimates based on workload and level of effort by role type, building on the action-type model and high-level division overview produced in this assessment.

Demographic Analysis & Succession Planning

An analysis of workforce demographics, tenure, retirement eligibility, and turnover would identify where OPP faces the greatest risk of future capacity loss. Understanding which roles and divisions are most vulnerable to attrition is essential for protecting mission-critical functions. This analysis would directly inform where cross-training, role redesign, or accelerated hiring would be most valuable.

Competency Assessment

A competency assessment mapping current staff capability levels to role requirements would identify gaps within and across divisions, flagging which skills are in shortest supply. This analysis would inform targeted training investments and refine hiring profiles for roles where internal supply is insufficient to meet demand.

Contractor & Staffing Mix Analysis

OPP's total talent ecosystem includes both federal staff and contractor support, but the current analysis does not capture contractor contributions to workload. A dedicated contractor and staffing mix analysis would identify current contractor support, determine which functions are suitable for outsourced arrangements, and model the optimal mix of federal and contract staff.

5.3 Phase 3: Strategy & Planning

With the deep-dive analyses complete, Phase 3 translates findings into an operational workforce strategy. Each area below builds directly on the analytical work from Phase 2.

- **Succession planning for at-risk roles.** Map retirement windows and attrition risk by role and division to develop targeted cross-training and knowledge transfer plans to protect mission-critical capacity before gaps materialize.
- **Staffing mix cost-risk tradeoff modeling.** Evaluate the cost, risk, and performance implications of different federal vs. contractor configurations, enabling leadership to select the staffing approach with the best balance of efficiency, quality, and sustainability.
- **Onboarding and training planning.** Develop an actionable plan to absorb the scale of hiring implied by this assessment, including a phased approach that avoids degrading steady state performance.
- **Surge vs. steady state deployment strategy.** Develop a clear operational protocol for managing the lifecycle of surge staff alongside permanent staff, including criteria for redeployment as the backlog diminishes and a transition plan for absorbing surge staff into permanent roles if required.

5.4 Phase 4: Institutionalize & Sustain

Phase 4 establishes the organizational infrastructure needed for OPP to own and sustain its workforce planning capability independently—without reliance on external support for each new analysis cycle.

- **Reusable workforce planning model and toolkit.** Build a documented, updatable model and workforce strategy that OPP staff can apply for internal planning, budget formulation, and future PRIA cycles, reducing reliance on one-time assessments.

- **Annual refresh cadence and operating rhythm.** Establish clear roles, responsibilities, and a repeatable process for updating workload and FTE estimates annually, so workforce data stays current and decision relevant.
- **Integration with budget and hiring cycles.** Embed workforce planning outputs into OPP's budget formulation and hiring authorization processes, ensuring staffing decisions are grounded in current workload data rather than historical precedent.
- **Leadership decision-support dashboards.** Develop real-time visibility tools that translate workforce model outputs into actionable indicators; enabling division directors and OPP leadership to monitor capacity, track progress, and respond proactively to emerging gaps.
- **Continuous improvement feedback loop.** Build a mechanism to track whether efficiency gains from BPR implementation and process investments are being realized, and to adjust FTE projections and workforce strategies accordingly over time.

As a final note, it is important to remember that the capacity gaps identified in this report are not self-correcting. Each phase builds on the one before it, creating a pathway that delivers actionable value at every stage while progressively fulfilling the full scope of the PRIA 5 workforce assessment mandate. Sustaining momentum will require continued investment in both the analytical work and the organizational infrastructure needed to act on its findings.

6. Appendix

6.1 List of Acronyms

Acronym/Term	Definition
AD	Antimicrobials Division
BEAD	Biological and Economic Analysis Division
BPPD	Biopesticides and Pollution Prevention Division
BPR	Business Process Review
EDSP	Endocrine Disrupter Screening Program
EFED	Environmental Fate and Effects Division
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FTE	Full-Time Equivalent
FWS	Fish and Wildlife Service
HED	Human Effects Division
ICS	Initial Content Screen
OPP	Office of Pesticide Programs
PID	Proposed Interim Decision
PMO	Project Management Office
PRD	Pesticide Reevaluation Division
PRIA	Pesticide Registration Improvement Act
PTS	Preliminary Technical Screen
RD	Registration Division
WFA	Workforce Assessment

Figure 22: List of acronyms used throughout report.

6.2 Organizations and Stakeholders Interviewed

#	EPA OPP Offices
1	Biopesticides and Pollution Prevention Division
2	Antimicrobials Division
3	Environmental Fate and Effects Division
4	Biological and Economic Analysis Division
5	Human Effects Division
6	Registration Division
7	Pesticide Reevaluation Division
8	Immediate Office

Figure 23: Censeo collected data from eight different OPP offices.

6.3 Report Graphics

Division	Current State	Potential Steady State Scenarios							
	Current Working Level FTEs	Scenario 1 - Low FTEs	Scenario 1 Gap (Surplus/Shortfall)	Scenario 2 - Medium FTEs	Scenario 2 Gap (Surplus/Shortfall)	Scenario 3 - High FTEs	Scenario 3 Gap (Surplus/Shortfall)	Scenario 4 - Very High FTEs	Scenario 4 Gap (Surplus/Shortfall)
BPPD	53	46.1	▲ 6.9	50.7	▲ 2.3	58.6	▼ -5.6	64.5	▼ -11.5
AD	68	65.7	▲ 2.3	71.8	▼ -3.8	82.5	▼ -14.5	90.8	▼ -22.8
RD	78	81.9	▼ -3.9	90.8	▼ -12.8	105.6	▼ -27.6	116.2	▼ -38.2
PRD	56	68.4	▼ -12.4	73.5	▼ -17.5	83.1	▼ -27.1	91.4	▼ -35.4
EFED	89	93.8	▼ -4.8	100.6	▼ -11.6	113.5	▼ -24.5	124.9	▼ -35.9
HED	70	67.4	▲ 2.6	72.6	▼ -2.6	82.2	▼ -12.2	90.4	▼ -20.4
BEAD	52	66.3	▼ -14.3	70.8	▼ -18.8	79.5	▼ -27.5	87.4	▼ -35.4
Total	466	489.5	▼ -23.5	530.7	▼ -64.7	605.1	▼ -139.1	665.6	▼ -199.6

Figure 24: Overview of FTEs required in each steady state scenario across divisions, with surplus/shortfall from the current state called out.

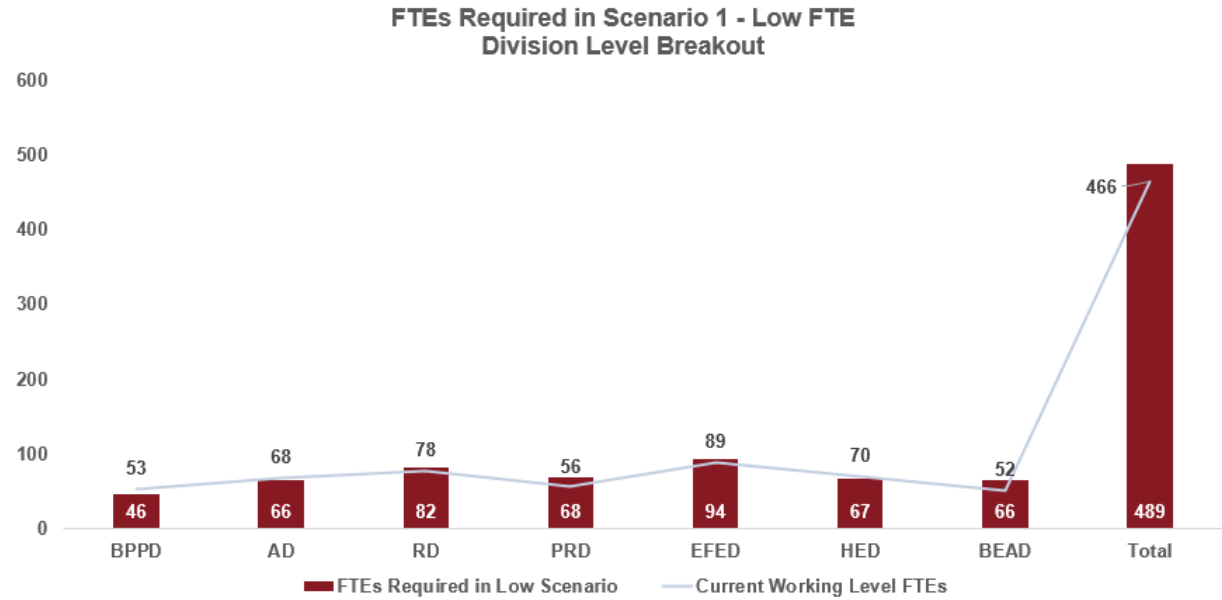


Figure 25: Division level breakout of FTEs required for each division in the low FTE scenario, with the current state represented by the blue line.

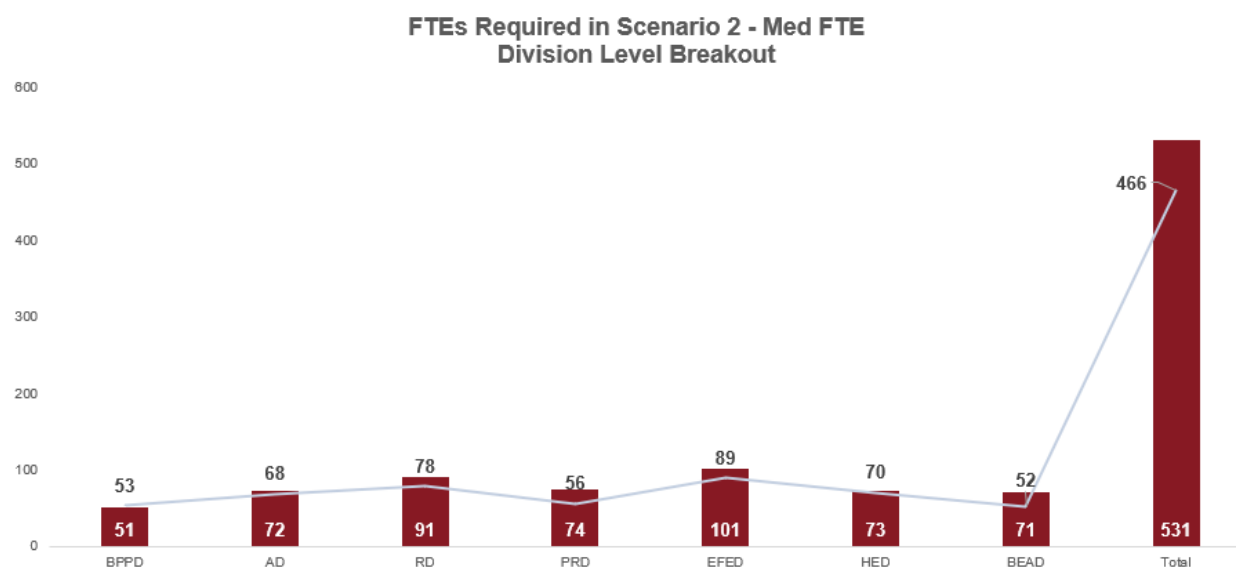


Figure 26: Division level breakout of FTEs required for each division in the medium FTE scenario, with the current state represented by the blue line.

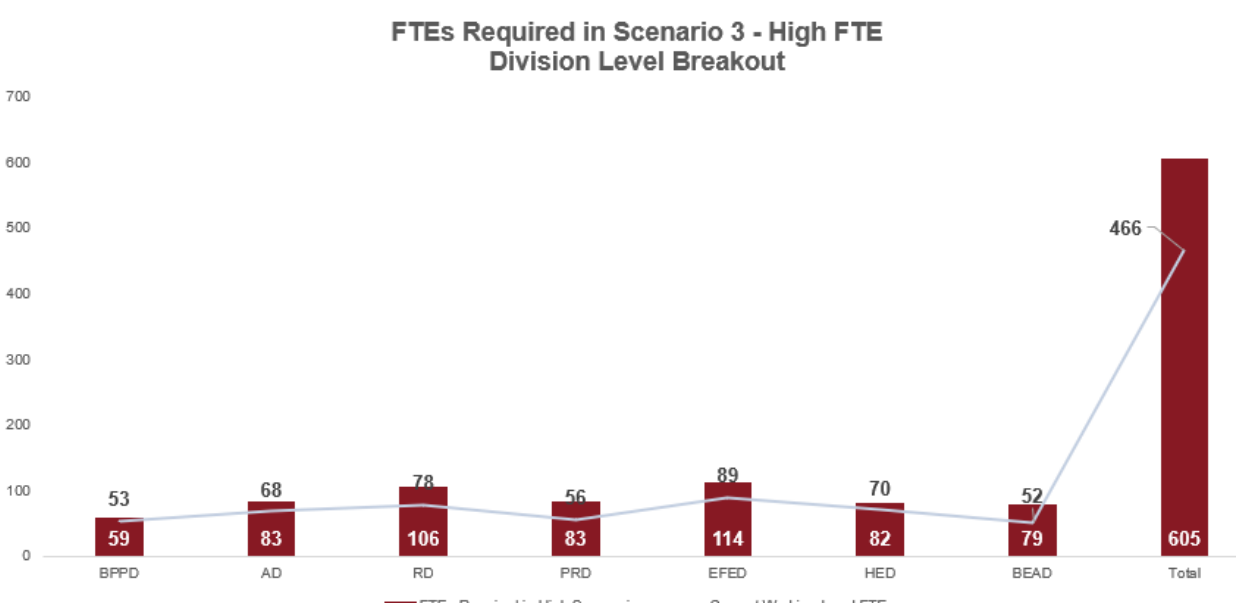


Figure 27: Division level breakout of FTEs required for each division in the high FTE scenario, with the current state represented by the blue line.

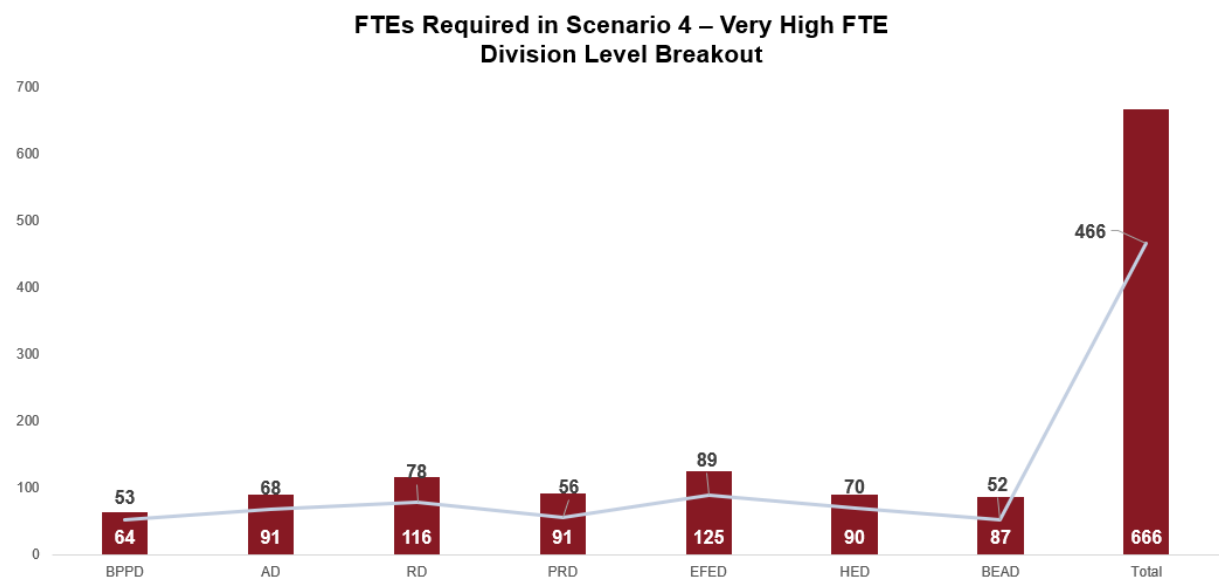


Figure 28: Division level breakout of FTEs required for each division in the very high FTE scenario, with the current state represented by the blue line.