Executive Summary

The U.S. Environmental Protection Agency's (EPA) Office of Pesticide Programs (OPP) is undertaking a strategic re-evaluation of its internal training and education programs to better support its regulatory mission under the Pesticide Registration Improvement Act (PRIA 5). This gaps analysis synthesizes findings from a comprehensive review of existing training materials, internal staff feedback, process mapping, and external stakeholder input to identify key challenges and opportunities for strengthening OPP's training infrastructure.

Training Priorities

More than 200 distinct training actions and more than 40 supporting non-training actions are documented as part of the *Support for Developing and Administering Training for Pesticide Programs* Gaps Analysis. Of these, thirty high-priority training actions are highlighted in Section 3 *Training Gaps*. The actions identified largely aim to reduce reliance on informal mentoring, improve cross-divisional coordination, and strengthen communication with applicants and registrants by improving consistency, efficiency, and transparency.

Top Five Training Priorities

Implement a Uniform, OPP-Wide Training Program
Standardize training across divisions with regular refreshers, field-based learning, and structured registrant engagement.

Redesign the OPP Website
Centralize and streamline access to training materials with improved navigation, version control, and user-specific access.

Establish Dedicated Training Staff
Assign staff to manage training development and delivery, ensuring quality and reducing burden on technical experts.

Align Internal and External Training Materials
Promote consistent messaging by developing training content that can be shared or mirrored for external stakeholders.

Address Low-Effort Improvements
Quickly update or remove outdated or ineffective training materials, especially those created before 2010.

To build a more consistent, transparent, and effective training environment across OPP, five strategic training priorities have been identified as the Top Five Training Priorities (see callout box). These priorities reflect both immediate needs and long-term goals for improving internal capacity, stakeholder engagement, and regulatory clarity. They are designed to address systemic gaps, streamline access to resources, and ensure that training efforts are sustainable and aligned across divisions. Additional High Priority Training actions and high-priority non-training actions include:

- Additional High-Priority Training Areas:
    - Administrative & Workflow Training: Focus on process mapping, Salesforce and similar software use, and formal mentoring.
    - Labeling: Field-based training, standardized label review, and clearer communication of policy changes.
    - Topical Gaps: Pre-submission processes, PRN 98-10, CDX, and BPPD data requirements.
    - Process & Technical Gaps: Training on key workflows, screening, risk assessment, and regulatory document development.
    - Division-Specific Needs: Tailored training for BEAD, HED, BPPD, and PRD on specialized processes and coordination.
- High-Priority Non-Training Actions:
    - **Take action to actively foster a Supportive Review Culture:** Establish shared values and a unified vision to guide training and promote fairness and consistency in reviews. Communicate this vision to Applicants and Registrants.
    - **Enhance Communication with Registrants:** Improve transparency and communication through tools like MyPest, centralized FAQs, and check-ins to clarify expectations.

Insights

The analysis revealed that while OPP has amassed a substantial inventory of training materials—over 1,000 resources across seven divisions—these materials are often fragmented, inconsistently maintained, and narrowly tailored to immediate needs. Approximately one third of these documents were developed prior to 2010. As a result, they lack the adaptability and cross-divisional relevance required to support a modern, cohesive training strategy. Internal staff emphasized the need for **improved workflows, centralized access to materials, and enhanced cross-divisional understanding**. Representatives for applicant and registrant groups echoed these concerns and called for greater transparency, consistency, and clarity in training and guidance materials.

Process mapping further illuminated gaps and redundancies in training content, highlighting areas where materials do not align with key regulatory steps or where critical guidance is missing altogether. Representatives for applicant and registrant groups also identified opportunities to improve training through automation, early user

testing, and the development of targeted resources such as a standardized Label Language Table and a consolidated public-facing website for all guidance documents, SOPs, Pesticide Registration Notices (PRNs), policies, memos and other documents that are used to guide the review of registration applications.

Importantly, this analysis acknowledges that not all challenges can be addressed through training alone. Many of the issues raised—such as communication barriers, workflow inefficiencies, and systemic inconsistencies—require broader organizational and policy-level solutions. Training should be considered an essential component of a coordinated strategy that includes process improvement, stakeholder engagement, and sustained leadership support.

Key Takeaways

Collaboration is valued. Registrants appreciate strong working relationships with EPA and support a shared responsibility for improving the regulatory process.

Effective practices exist. Tools like the AD Efficiency Team Mailbox, pre-submission meetings, and PRIA coalition engagement are seen as highly productive.

Automation is a priority. Streamlining notifications through automation could reduce delays and improve efficiency.

BETA testing is essential. Early user testing helps identify usability issues and ensures tools meet real-world needs.

Section 1. Background

EPA's OPP is responsible for regulating pesticides and minimizing the risks associated with their use to ensure pesticides are safe for humans and the environment. Under the Pesticide Registration Improvement Act reauthorized in 2022 and known as PRIA 5, OPP is required to administer training and education programs relating to its divisions' regulatory responsibilities and policies. This Gaps Analysis Technical Memorandum summarizes the training needs and potential gaps in existing materials as determined through a training materials inventory, process mapping, and internal Points of Contact (POC) feedback and trade group industry representative feedback.

Section 2. Approach

This analysis integrates multiple data sources to identify gaps between current strengths and areas for improvement in OPP's training landscape. Key sources included: an inventory of existing pesticide training materials, a needs assessment driven by facilitated discussions with OPP POCs in each Division, a development of workflow process maps for each division in conjunction with an analysis of training materials supporting process steps identified, and feedback from eight trade group industry representatives, representing applicants and registrants.

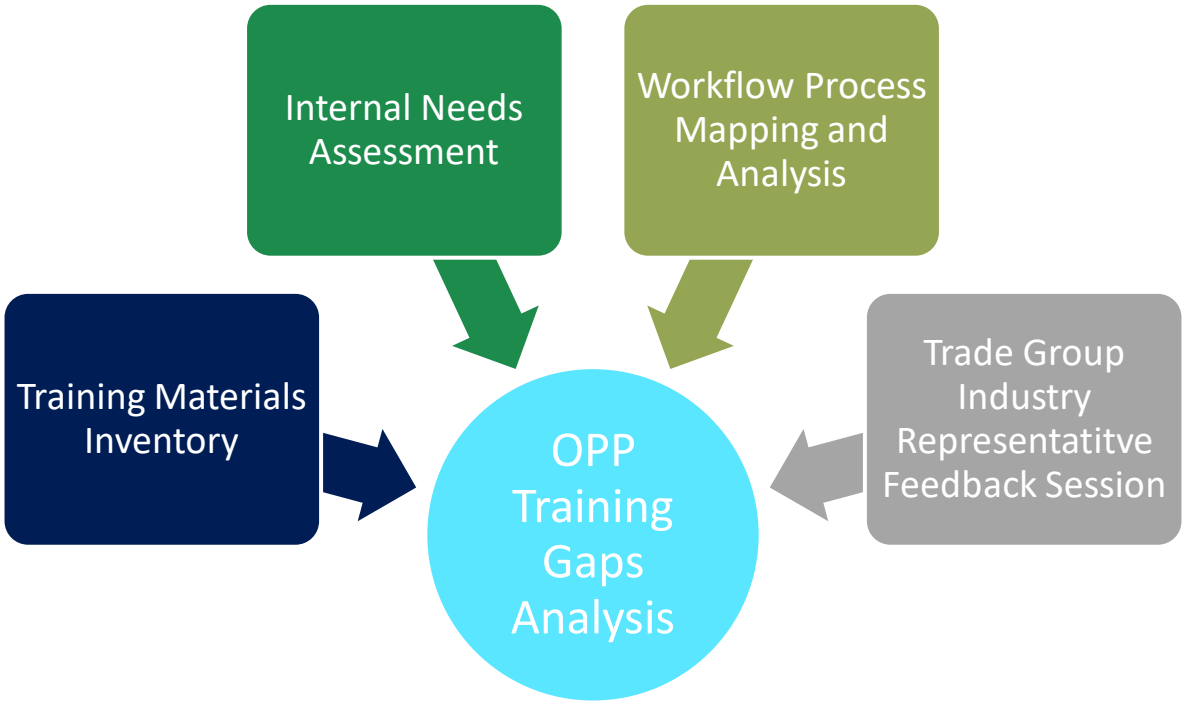


Figure 1. Multi-Source Framework for OPP Training Evaluation

By overlaying insights from these sources, the analysis highlights both division-specific needs and cross-cutting opportunities to enhance training consistency, accessibility, and effectiveness.

The approach combines objective data, such as the desktop review and inventory of training materials as well as the workflow process mapping, with qualitative insights gathered through dynamic conversations with staff intimately involved in the pesticide registration process and the industry trade group representatives. These insights informed the development of process maps analysis that illustrate how people, materials, and workflows interact across divisions. To ensure accuracy and relevance, these maps were validated through a "ground-truthing" process with OPP POCs. The result is a rich, comprehensive picture of the current training landscape—one that clearly reveals specific and actionable gaps.

2.1 Training Materials Inventory

The OPP has nearly 1,100 individual training materials collected across all seven OPP divisions, repository materials, and knowledge articles (KA). OPP Divisions contributing training materials included the Antimicrobials Division (AD), Biological and Economic Analysis Division (BEAD), Biopesticide and Pollution Prevention Division (BPPD), Environmental Fate and Effects Division (EFED), Health Effects Division (HED), Pesticide Reevaluation Division (PRD), and the Registration Division (RD). The training materials inventory, included in Appendix A, provides detailed information for each training resource, including its originating division, location and accessibility information, topical tags, description, date, author, and a priority level (e.g., high, medium, and low) indicating the urgency for updating the material. Figure 2 provides quick statistics from the inventory.

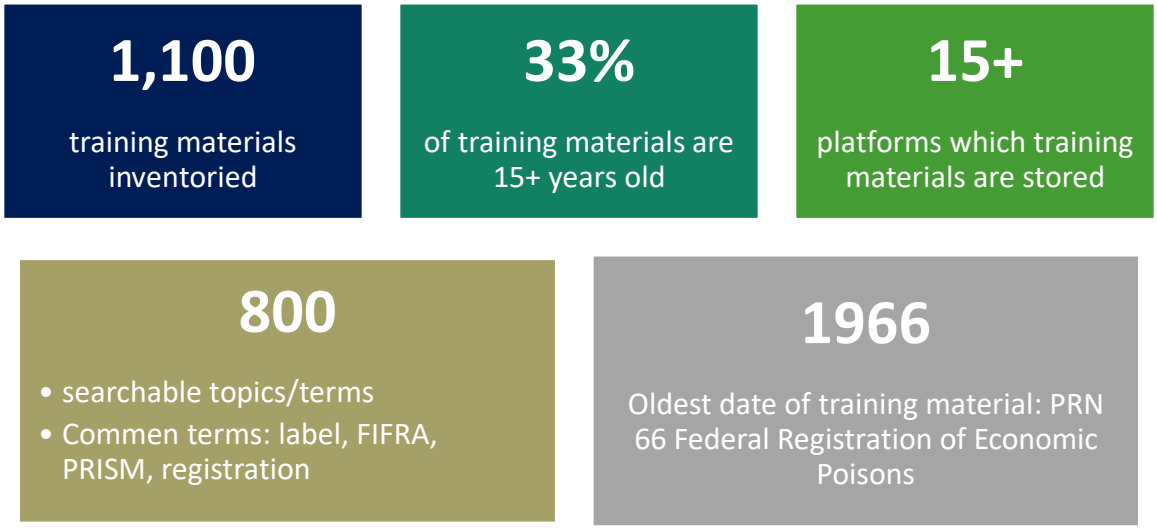


Figure 2. OPP Training Materials Inventory Quick Statistics

Most of the training materials catalogued were part of the centralized repository. Several of these resources serve dual purposes, functioning both as internal training tools and public-facing informational documents. Of the nearly 1,100 training materials catalogued, 33% of the identified materials are 15 years old or older, underscoring the need for updates to maintain relevance and accuracy. Training content is currently

stored across 15 distinct platforms, with additional materials located on private computers, creating challenges for accessibility, consistency, and version control. A total of 57 training materials were flagged for removal due to being outdated or no longer relevant, based on feedback from internal POCs and external industry trade group representatives.

Each resource was assigned a priority level for updating: 37% are categorized as low priority, 22% as medium priority, less than 39% as high priority and 1% are recommended for potential removal, 1% are in development, and less than 1% are case studies which cannot likely be updated. Figure 3 summarizes data regarding the materials' sources, priority for updating, terms or themes, and age of training materials.

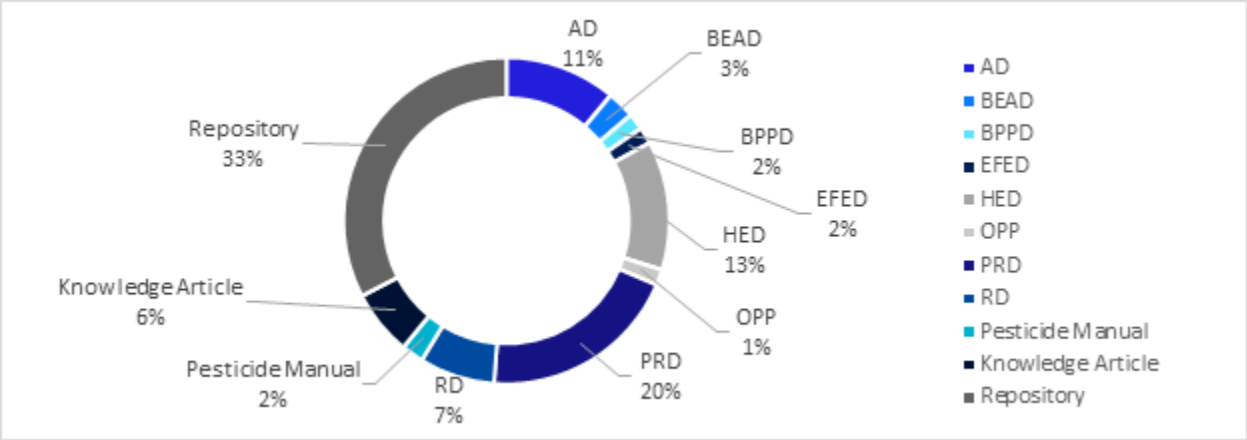


Figure 3. OPP Training Materials Inventoried by Source Type

2.2 Internal Feedback Sessions

It was recognized early in the process that OPP division staff hold critical insights into what is working and what isn't, with regard to current internal training practices. They are also well positioned to identify emerging training needs. With this context, an initial interview framework was developed to guide individual discussions with designated POC(s) from each division, as identified by the COR.

Some divisions participated in a single feedback session, while others engaged in multiple discussions to provide more detailed input. All divisions contributed an initial set of training materials to help illustrate their current training approaches. Most also followed up with additional emails to clarify and expand on their feedback, adding depth to the understanding gained through the interviews.

The resulting input informed a comprehensive needs assessment, summarized in the Needs Assessment Executive Summary provided in Appendix B, which captures internal staff perspectives on training gaps, opportunities, and priorities.

2.2.1 Current training practices and issues

Training within OPP varies significantly by division, with each division employing its own approach. These approaches include formal structures such as training committees, written procedures, and guidance documents, as well as informal methods like mentoring, one-on-one instruction, and "office hours" sessions. The use of resources and trainings offered by external stakeholders and industry groups also differs widely, depending on each division's level of interaction with industry.

Despite these differences, divisions share several common challenges: difficulty locating training materials, limited cross-divisional understanding, and inconsistent workflow management. These shared issues highlight the need for a more coordinated and accessible training framework across OPP.

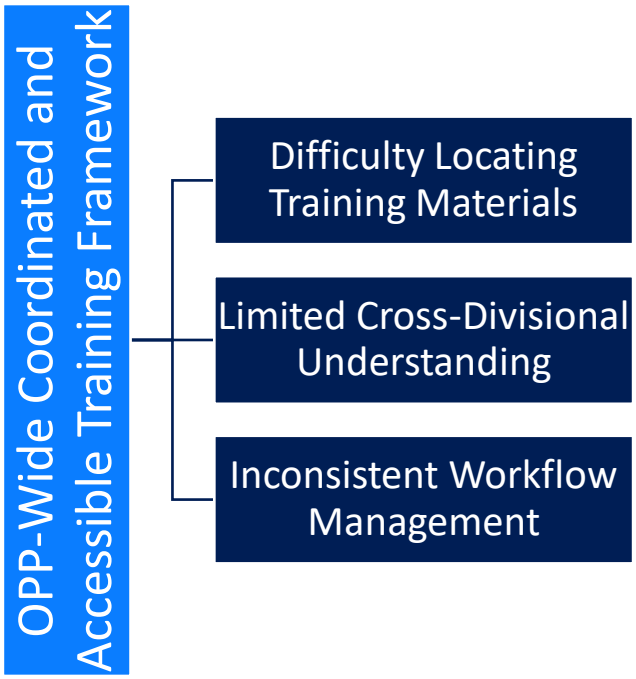


Figure 4. Shared Challenges highlight the case for a unified OPP-wide training approach

2.2.2 Priorities for improvements

Staff across OPP identified several shared priorities for strengthening training efforts. These include improving workflows, updating written guidance, and developing cross-divisional training programs to promote consistency and collaboration. POCs also emphasized the need for better communication and tracking systems, along with the creation of a centralized repository for training materials.

In addition, POCs noted that when new tools or processes—such as Salesforce—are introduced, staff often face challenges due to limited familiarity and inconsistent rollout across divisions. This lag in adoption presents a clear training opportunity: to provide timely, structured support that helps staff adapt to new systems and ensures smoother, more uniform implementation agency wide.

Updating guidance documents, which many OPP staff rely on heavily in their day-to-day work, was also flagged as a critical need. Finally, there was widespread interest in strengthening cross-divisional understanding to ensure alignment and shared knowledge across the entire organization.

2.2.3 Proposed solutions

During internal feedback sessions, participants offered a range of practical solutions to address the training challenges they identified. Suggestions included improving the search functionality of the location where training materials are stored, creating a centralized location for all divisions to house training materials, offering annual refresher courses across all divisions, and updating publicly available guidance documents to reflect current practices. These and other proposed solutions are summarized in the Needs Assessment Executive Summary in Appendix B.

2.3 Process Mapping

Process mapping is a valuable tool for visualizing the steps and interdependencies within complex systems, such as the pesticide registration process. The process maps developed for OPP, included in Appendix C, integrate information from existing training materials and internal feedback sessions to illustrate how a process steps an application moves through as well as how information flows between divisions.

Process flow maps were developed for each division and for the entirety of OPP. The process flow maps were developed using Microsoft Visio software and the native files are provided to this memorandum as supplemental information. In Figure 5 (below) the green ovals indicate an initiating step, the blue boxes identify each process step that occurs within EFED. The gray “document shape” boxes identify supporting materials for each process step that are already available. The orange “document shape” boxes identify supporting materials that have been identified as important to develop by the internal Division POC or trade group industry representative. Interactions between divisions are identified for each division’s specific process flow map.

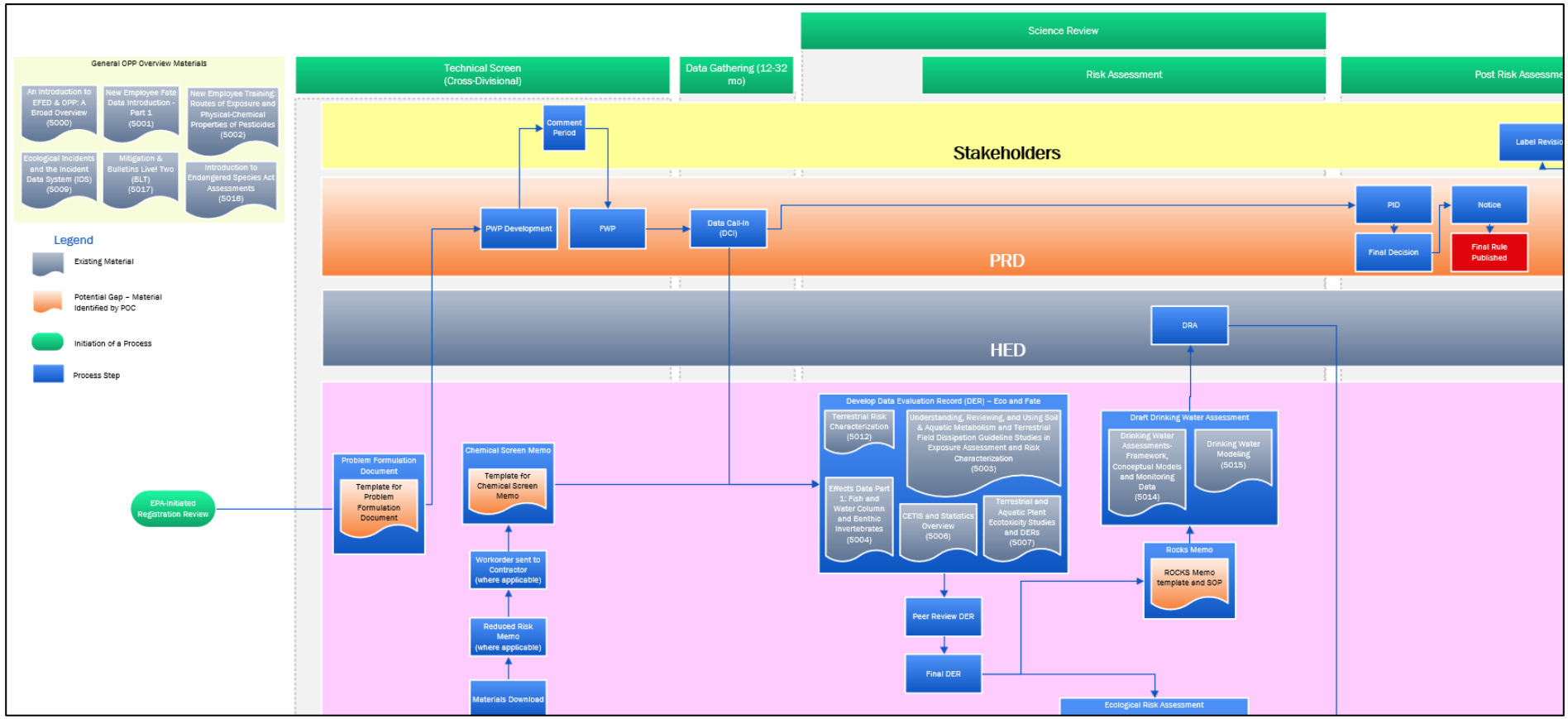


Figure 5. Extracted image from part of the EFED Process Map

By aligning training materials with each process step in the workflow, the maps reveal where resources are concentrated and where critical gaps exist. This exercise provided much-needed clarity on the structure of the registration program and the relationships between divisions. It also highlighted that some divisions have a clearly defined approaches and significant amounts of training materials to support internal training needs for each step in the review process, while others have clear gaps where training materials could be developed in support of specific steps in the review process.

Figure 6 illustrates how the information gained from the process flow mapping is identified in the Gaps Analysis. Training-related actions which could support gaps identified from the process flow mapping are grouped by Division. For each identified Process Flow Step gap, the associated impact and challenge are documented, along with a recommended training-related action to address the gap. The results of this analysis for all Divisions are presented in Appendix E as part of the overall Gaps Analysis results.

Process Flow					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Process	**Process Flow Steps**	Staff must use informal mentoring or seek out approaches to moving a registration through a given flow step.	*The workflow process of any registration in OPP is extremely complex, with most products requiring product-specific process flows.*	*Develop new or identify existing training resources to support the following BEAD process steps:*	
				- Develop training materials to describe how to complete an Emergency Exemption Review. This should be created to be applicable to multiple divisions.	
				-Develop training documents on how to develop and provide Benefits/Impacts drop-in language for Proposed Interim Decisions and Interim Final Decisions.	
				-Develop training documents on how to develop and provide Use/Usage Drop In Language for PWPs, FWPs, and Interim Final Decisions for PRD.	------
				-Develop training documents on how to complete an economic analysis for the Proposed Interim Decision.	
				-Develop training on how to develop a Data Evaluation Record. This training could be jointly shared between divisions.	
				-Update Rate Distribution and SUUM SOPs.	

Figure 6. Example of Process Flow Mapping Informing the OPP Training Gaps Analysis

2.4 External Stakeholder Feedback Sessions

Registrant perspectives provided valuable insights into OPP training needs. Eight individual POCs representing eight trade group industry members of the PRIA Coalition were interviewed shared feedback on the registration process, training gaps, and opportunities for improvement. Their input is summarized in this section and detailed further in the Executive Summary in Appendix D.

2.4.1 Challenges and concerns

Registrants identified inconsistency and reliability in the registration process as central challenges tied to OPP training. They shared the following concerns:

- **Delays and inefficiencies**, including extended review timelines and missed PRIA deadlines.
- **Inconsistent review practices** and training gaps, often due to informal processes and limited real-world context.
- **Lack of transparency in sign-off procedures**, leaving registrants uncertain about review progress.
- **Website and information management issues**, particularly confusion over which guidance documents are authoritative.
- **Loss of institutional knowledge** due to retirements and the absence of a clear succession or knowledge transfer strategy.

2.4.2 Suggested training materials or approaches

Registrants offered several recommendations for new training materials and approaches, which are summarized in the External Stakeholder Executive Summary (Appendix D). These suggestions fall into five key categories:

- **General Registration Process**: Implement a uniform, sustainable training program across all OPP divisions that includes online modules and supervisor oversight to ensure consistency and regulatory alignment. Make all relevant training materials available to registrants to promote transparency. Collaborate with industry groups to improve data presentation. Standardize internal and external training content to ensure consistent expectations and reduce confusion.
- **Label-Specific Training**: Enhance label-specific training by developing modules that teach staff how to interpret and evaluate label language, supported by a standardized "Label Language Table" for consistent terminology. Regularly update the Label Review Manual to reflect current policies and include curated resources and links to relevant guidance documents for improved usability.
- **OPP-Wide Training:** To improve consistency and efficiency across OPP, develop joint training for regulatory and efficacy teams, and create clear, regularly updated manuals that distinguish legal requirements from best practices. Establish centralized, accessible resources for PR Notices and SOPs, and implement scenario-based and workflow-focused training for both EPA staff and registrants to streamline submissions, reviews, and communication.
- **Tool-Specific Training:** Develop targeted modules for antimicrobial products, efficacy calculations, and common submission types like CSF amendments and label notifications. Reinstate field-based and video training to give EPA

staff real-world context and collaborate with both industry partners and land grant institutions for hands-on learning. Improve CDX training with step-by-step tutorials and ensure EPA reviewers and registrants understand jurisdictional boundaries, label review impacts, and practical constraints in product implementation.

- **Other Needs**: Establish a centralized, up-to-date training program to reduce regulatory confusion and improve consistency. Include modules that clarify current guidance documents, explain how to interpret overlapping or outdated regulations, and demonstrate how to integrate these tools into the registration process for both EPA staff and stakeholders.

2.4.3 Other insights and opportunities

External feedback provided valuable insights into how industry groups perceive the registration process and OPP operations, while also highlighting broader challenges not tied to specific processes. The following key themes emerged that point to additional opportunities:

- **Strong relationships and communication are essential**. Registrants emphasized the value of collaborative interactions, noting positive interactions with EPA staff and a growing sense of shared responsibility for improving the regulatory environment.
- **Certain OPP practices are working well**. Stakeholders highlighted the AD Efficiency Team Mailbox, pre-submission meetings, and EPA's engagement through the PRIA coalition as effective practices that support clarity and responsiveness.
- **Automation offers potential**. External feedback highlighted that the notification process could be streamlined, thereby reducing delays and improving efficiencies, by evaluating opportunities for automating the review of certain process steps.
- **Expand BETA testing.** External feedback highlighted the willingness of trade groups to partner with OPP and act as early testers of tools and systems to identify usability issues, enhance workflows, and ensure solutions meet real-world need.

Section 3. Training Gaps

To address the challenges of internal staff training across OPP, a comprehensive gaps analysis was conducted using an inventory of existing pesticide training materials, feedback from interviews with internal OPP POCs, workflow process maps, and insights from External Stakeholder Feedback Sessions. The resulting gaps were organized into five key categories: administrative processes, labeling, topical knowledge, technical workflows, and division-specific procedures. The analysis yielded more than **200 specific training-related actions** and **44 non-training related actions** that OPP can take

to improve internal staff training, consistency, comprehension, and operational efficiency. The tables below identify these actions.

3.1 Consolidated High-Priority Training Actions

High-Priority training actions are identified in this section such that, if implemented, would improve consistency, efficiency, transparency, and alignment with official guidance. These actions are designed to reduce reliance on informal mentoring, improve coordination across divisions, enhance communication with stakeholders, and ensure that both EPA staff and registrants are equipped with the knowledge and tools needed to navigate complex regulatory processes effectively. The five highest priorities to support overall EPA Internal Training needs are identified in 3.1.1 Overall Training Priorities. The remaining high-priority training actions are identified in subsequent sections and sorted by key categories.

Top Five High-Priority Training Actions

1. **Implement a Uniform, OPP-Wide Training Program**
2. **Redesign the OPP Website**
3. **Establish Dedicated Training Staff**
4. **Align Internal and External Training Materials**
5. **Address Low-Effort Improvements**

3.1.1 Overall Training Priorities

The following overall recommendations are made to OPP based on this Gaps Analysis.

1. **Implement a Uniform, OPP-Wide Training Program to Promote Consistency and Cross-Divisional Alignment.** To ensure consistent understanding and application of processes and policies across all OPP divisions, establish a standardized training program that supports both new and experienced staff and fosters shared practices across divisions.
    - Deliver regular refresher trainings focused on core processes and policies that apply organization-wide, reinforcing consistency and reducing variability.
    - Provide practical, field-based learning opportunities—such as site visits, video demonstrations, or virtual tours—on a recurring schedule to deepen staff understanding of real-world implications, especially around label interpretation and implementation. These experiences should be made accessible to a broader range of staff across the organization, with financial barriers removed to ensure equitable participation and maximize impact. Where possible, crop tours, which are already used as a training tool, should be recorded and formatted so that viewers can independently understand the content without requiring live narration or facilitation.

- Provide a forum for staff to learn from registrants in a structured and regular format.
- **Standardize the Development and Tracking of Training Materials.** Establish a centralized, transparent process—and a shared location—for tracking how, when, where, and at what stage training materials are being developed. While the current inventory includes much of the necessary content, materials are scattered across various platforms, limiting cross-divisional collaboration and responsiveness to evolving programmatic or regulatory needs.

  Many resources are created in silos to address immediate issues, resulting in narrowly focused materials that often lack long-term relevance. Without a unified system, training content struggles to keep pace with shifts in EPA priorities, policies, and stakeholder expectations.

2. **Redesign the EPA OPP Website** to improve navigation and searchability of OPP resources for internal EPA staff and External Stakeholders.
   - *Actionable Item:* Host both internal and external training materials in a centralized location on the website, using access controls (e.g., password protection) to restrict internal content as needed. While an intranet site exists, training materials are currently dispersed across more than 15 different locations, including shared drives, legacy systems, and personal computers, making access inconsistent and inefficient. Centralizing content will streamline access, improve version control, and reduce reliance on informal storage. Additionally, external stakeholders have expressed strong interest in accessing as much training material as permissible, particularly those that clarify how EPA reviews applications. A centralized, access-controlled platform will support transparency, consistency, and broader stakeholder engagement.
   - *Actionable Item:* Implement version control and regular updates for all internal training materials to ensure accuracy and consistency across divisions.
   - *Actionable Item***:** Require all divisional training materials to be stored in this centralized location to support alignment and reduce duplication.
   - *Actionable Item:* Implement intuitive navigation with clear categories for different user groups (e.g., registrants, state partners, EPA staff).
   - *Actionable Item:* Enhance search functionality with filters, keyword suggestions, and document tagging to help users quickly find relevant materials.

3. **Establish Dedicated Training Staff to Support Workforce Excellence.** Given the size of the OPP workforce, the public health importance of pesticide registration, and the significant economic impact of the process, it is essential to invest in dedicated training personnel. Relying on registration staff to develop or deliver training diverts experienced professionals from their core responsibilities and can slow down critical regulatory work.
    - *Actionable Item: A*ssign dedicated staff to manage training across OPP to ensure consistent, high-quality onboarding and professional development without compromising the efficiency or expertise of the registration process. This approach supports operational continuity and long-term workforce development. Given limited internal resources, this recommendation also includes the option to engage third party trainers such as external experts or partner organizations. Bringing outside support can reduce the burden on internal staff while still meeting training goals and maintaining program quality.
4. **Align Internal Training Resources with External Communication for Greater Consistency.** To ensure all stakeholders are "reading from the same sheet of music," internal training materials should be developed with external alignment in mind. When creating or updating internal training documents, also consider sharing those materials directly with external stakeholders, or when appropriate, developing a companion version tailored to their needs. This approach promotes transparency, reinforces consistent messaging, and helps build a shared understanding between EPA staff and registrants.
5. **Address Low Hanging Fruits.** Consider Addressing these quickly and with expected low level of effort to clean up existing training materials and remove sources that are inaccurate, out-of-date, or irrelevant.
    - Review all materials developed prior to 2010 for relevancy. The materials are identified in Appendix E.
    - Review PowerPoint files that do not have supporting audio or notes for accuracy and effective communication. The materials are identified in Appendix E.
    - Review the individual documents and trainings that have been identified as high priority for update through the Division POC Feedback Sessions, External Feedback Sessions, and cursory analysis of the content. The materials are identified in Appendix E.

3.1.2 Administrative & Workflow Challenges

High priority training actions identified which support administrative and workflow challenges are as follows:

- Develop and share workflow process maps for each type of registration as a training approach that can be shared for internal EPA staff and external stakeholders.
- Align training with official guidance using crosswalks and embedded references to reduce misinterpretation.
- Provide training on workflow tools like Salesforce to improve tracking, communication, and coordination across divisions.
- Reduce reliance on informal mentoring by establishing a formal mentoring program and capturing institutional knowledge.

3.1.3 Labeling Challenges

High priority training actions identified which support labeling challenges are as follows:

- Provide real-world field training (e.g., site visits, videos) to improve practical understanding of label implications and improve labeling accuracy.
- Standardize label review training across divisions with examples, PRNs, and acceptable language.

3.1.4 Topical Training Gaps

High priority training actions identified which support topical training gaps are as follows:

- Provide training on pre-submission processes and agreements, including documentation and deviation protocols.
- Enhance CDX training for both EPA staff and external stakeholders with example-based modules, videos, and walkthroughs for common submission types.
- Develop PRN 98-10 training modules to clarify scope and prevent misapplication.
- Train appropriate EPA staff and external stakeholders on data requirements for BPPD products, including waivers and consultation tracking.

- Provide training that distinguishes between legal requirements and best practices to reduce registrants' confusion and time wasted revising formulations to conform with best practices rather than regulatory requirements.
- Train staff on communicating policy changes clearly and consistently to registrants and stakeholders.
- Offer shared training for EPA staff and registrants, when possible, to improve communication and transparency between EPA staff and registrants.

3.1.5 Process & Technical Gaps

High priority training actions identified which support process and technical gaps are as follows:

- Develop comprehensive process flow training for key steps across divisions (e.g., 21-Day Screen, EUPs, DERs).
- Train on front-end screening and Form 8570-01 to reduce misrouting and delays.
- Develop training to OPP staff and CORs overseeing contracts on how to communicate work orders to contractors and manage external coordination. This may additionally include developing a Community of Practice.
- Train on how to complete and submit emergency exemption reviews across all divisions.
- Provide guidance documents and training on ESA determinations and interdivisional support to improve coordination and accuracy.
- Train on regulatory document development (e.g., PIDs, OPP One Pagers, Pre-Decisional Letters).
- Create shared DER development and peer review training across divisions.

3.1.6 Division-Specific Process Flow Training

High priority training actions identified which support process flow training are as follows:

- Develop PRD training on tolerance development, CBI review, and document review timelines.
- Develop training for HED on RARC development and alignment with official guidance.
- Create training for BPPD on tolerance exemptions, IRM, and science tech screens.

- Develop training for BEAD on process steps, including tolerance exemptions, economic analysis and drop-in language for decisions.

3.2 Consolidated High-Priority Non-Training Actions

The Gaps Analysis identified 44 distinct non-training actions that, while not direct training solutions, would support the resolution of the identified training gap. These actions are detailed in the tables below. The following section highlights two high-priority non-training actions that emerged from the analysis.

1. **Cultivating a Consistent and Supportive Review Culture.** Build a culture where training reinforces shared values and expectations. Training should not only convey technical knowledge but also foster a mindset of collaboration and fairness—ensuring reviewers are aligned and not focused on identifying faults. The ultimate goal is to deliver consistent, equitable reviews regardless of who conducts them.
    - *Actionable Item:* Establish and document a set of shared priorities and a unified vision that will serve as the foundation for all training efforts. Use this framework to guide the development and delivery of training materials, ensuring consistency in both content and reviewer approach. Apply the priorities and vision with registrants.
2. **Improve and Increase Communication to Support Registrants Throughout the Process.** Clear, proactive communication is essential for transparency, efficiency, and trust. Strengthening communication practices ensures that all parties stay informed, aligned, and confident in the process.
    - ***Actionable Item:*** Investigate how MyPest could be better used for communication.
    - ***Actionable Item:*** *Create a centralized FAQ or knowledge base that addresses common questions and provides guidance on navigating the registration process.*
    - ***Actionable Item:*** *Offer optional check-in points (e.g., virtual office hours or milestone-based outreach) to give registrants opportunities to ask questions and clarify expectations.*

3.3 Training Gaps Analysis

The following tables provide a full summary of information identified in the training gaps analysis.

Table 3.3.1 Gaps Identified as Administrative Challenges

Administrative Challenges					
Keyword	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Timeline / Meeting Dates	**Consistent training on front-end processes for EPA Staff.**	Impacts on registrants may include missing entire seasons of use.	*Difficulty meeting PRIA deadlines*	Develop training for EPA staff on how to use MyPEST to communicate timeline updates to registrants.	Utilize MyPEST to automatically provide updates to registrants on the status of their registration
				Implement automation tools to streamline the review and processing of label notifications, reducing delays and manual workload.	------
		Label claims group, pet products, very inconsistent and usually surfaced a week before the registration is due.		Develop trainings to improve front-end screening consistency.	------
				Develop training on the correct handling of Form 8570-01	------
				Develop training on routing products to the correct reviewer after assigning numbers.	------
		Delays in Core Processes. Significant delays persist in label reviews, notifications, and the updating of company contacts—especially during ownership transfers. These delays ripple through the registration process and affect state-level approvals.	*Sign-Off Delays After Review Completion*	Create training on improving the speed of a review for final signature (after the PRM has made a decision.)	Increase transparency in the sign-off process, clarify responsibilities, and implement escalation protocols.
				Develop training for OPP staff and applicants on how to escalate or request signatures effectively.	------
		Reviews take additional time due to package modifications required.	*Registrants could be more efficient at putting together a well-documented package.*	Develop a guidance for registrants to use existing templates for submissions. Explain how and why to use them.	------
				Provide trainings on the use of models to better understand inputs and assumptions.	------

Table 3.3.1 Gaps Identified as Administrative Challenges (continued)

Administrative Challenges					
Keyword	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Workflow	**It is difficult for EPA staff to reference past decisions.**	Sometimes a second variety goes through a new PIP registration for a product and receives a different set of questions and reviewer feedback. This creates a conflict when a 2nd variety goes through and has different questions.	*No Centralized System for Documenting Case Decisions*	Develop a training document on how to review existing decisions for their applicability to a new case.	Develop a centralized system for documenting case decisions.
				Identify a single centralized system to house process efficiencies and best practices from all divisions.	Develop a protocol/workflow for documenting case decisions and their broad applicability.
				------	Review/update/change the mechanisms for PMs to communicate and share insights, which would help align decisions and reduce variability in reviews.
				------	Develop training on maximizing Salesforce features to visualize, track, and communicate workflow. (AD rec)
				------	Workflow management and communication between divisions should be improved or better defined. (AD rec)
				Develop training on maximizing Salesforce features to visualize, track, and communicate workflow.	more efficiently and effectively provide IT-type support for their processes.
				Clearly identify responsibilities and workflow between Risk Managers and Risk Assessors.	------
				------	Tracking and communication between divisions could be improved or better defined.
				Develop written SOPs, guidance for Salesforce, specific to divisional needs (PRD)	Provide an opportunity for Division representatives to talk with contractor administering Salesforce.
				Develop training on how to make existing systems work better for data management.	Develop a better system for Data Compensation Management.
				------	DCIs should be a one-time thing. Staff must repeat themselves and re-do the work multiple times because the software does not support the DCIs.
				------	Provide support to Divisions to update written guidance documents.
				Develop an SOP for naming conventions within Salesforce.	Develop a consistent approach to SOPs and naming conventions within Salesforce training. (AD rec)

Table 3.3.1 Gaps Identified as Administrative Challenges (continued)

Administrative Challenges					
Keyword	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Training Materials are Scattered and outdated.	**It is difficult for EPA staff to find the pertinent training materials and confirm that they are the most up-to date materials.**	Guidance and regulations are scattered, outdated, in a draft form, or superseded, making it unclear what's current for both EPA staff and stakeholders.	*The Technical Screen appears to be inconsistent.*	Develop training on using automated tools to identify if a product has already been submitted for another variety AND how to pull pertinent information from the completed review for the new review.	Identify opportunities to remove inconsistencies in the technical screen and provide checklists for automation where possible.
			Registrants want clarity on which guidance documents are most frequently used by EPA staff and which documents are	Train staff and stakeholders how to efficiently locate and use guidance documents and policies on the OPP website.	Specifically identify SOPs, guidance documents that EPA staff use for review on a public facing
				Update templates for Data Evaluation Records (AD)	
				Redesign the EPA OPP Website to improve navigation and searchability of OPP resources for internal EPA staff and External Stakeholders. Review the existing OPP website and remove all guidance documents that are not used by EPA staff in the review process.	------
		There is a recurring issue of inconsistent decisions between reviewers, even within the same division. This inconsistency creates confusion and inefficiencies, especially when guidance documents are outdated or contradicted by internal practices.	Identifying the correct guidance documents are difficult for EPA staff and Registrants.	Redesign the EPA OPP Website to include the consolidation and explanation of all PR Notices in an accessible format.	------
			Registrants want clarity on when guidance documents are replaced.	Create a single location on the public facing website for all guidance documents, SOPs, PRNs, policies, memos, etc. that are used to guide review of registrations	Create an automated notification system to identify when new documents are available.
			Registrants want clarity on: The level of internal review and approval behind each document	------	Publicly share as much review information as possible with registrants to promote transparency.

Table 3.3.1 Gaps Identified as Administrative Challenges (continued)

Administrative Challenges					
Keyword	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Pesticide Registration Manual	**New staff may reference outdated portions of the Pesticide Registration Manual.**	Registrants are putting packages together based on outdated information.	*The Pesticide Registration Manual, which is promoted as authoritative but may be outdated in practice.*	Remove all training PowerPoints that don't have accompanying audio or notes.	Review and update the Pesticide Registration Manual.
				Remove outdated training.	Develop a schedule for updates for the review manual.
Inconsistent Division Training Approaches	**Training across OPP divisions lacks uniformity.**	This leads to varied interpretations and practices among staff.	*Communication between divisions is difficult and individuals within each division are trained through different approaches.*	Implement a uniform training program across all OPP divisions to ensure consistent understanding and application of policies.	------
				Include online training modules that staff can complete independently, with supervisor oversight to verify completion.	------
				Develop training for navigating the Registration Division of OPP and registrants.	------
				Develop more SOPs on review decisions with the purpose of developing more predictable decisions.	------
				Create joint training sessions for both regulatory and science teams (e.g. efficacy) to ensure a shared understanding of label requirements and reduce internal inconsistencies.	Training materials and program provided to EPA staff on how to review and assess registration should also be provided to registrants.
				Create training content that clearly distinguishes between legal requirements, best practices, and reviewer preferences.	------
				Educate staff on workflow best practices and communication strategies, especially in coordination with state partners.	------
		Some guidance was not uploaded to centralized portals during past administrative transitions, leading to confusion about its validity. Example: A long-standing exemption for pheromone trials (250-acre threshold) was not recognized by EPA, causing an 8-month delay and requiring industry intervention via BPIA to	*Reviewers often lack awareness of existing guidance documents, exemptions, and PRNs, or are unclear on their current status.*	Develop materials and modules to help Division staff understand the full process flow of a registration application.	------
				Create a comprehensive training module that covers all PRNs.	------
				Process Efficiency and Workflow Management -Train both EPA staff and registrants in navigating a centralized, version-controlled repository with automatic notifications for updates.	------
				Process Efficiency and Workflow Management - Provide formal training sessions for both internal EPA staff and external registrants whenever a new PRN is issued.	------
		Overreliance on mentoring creates vulnerabilities, especially during staff turnover.	*As experienced staff retire there is a concern about the loss of institutional knowledge.*	Develop a formal mentoring program with associated training prompts.	------
				Identify staff with key institutional knowledge at risk of departure within five years, and use AI to capture and organize their insights for future training.	------

Table 3.3.1 Gaps Identified as Administrative Challenges (continued)

Administrative Challenges					
Keyword	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Inconsistent Division Training Approaches	**Training practices across OPP divisions lack uniformity.**	When training materials are not designated as official guidance, they may reflect individual or divisional interpretations. This can create inconsistencies in how program requirements are understood and applied—both internally and externally.	*Internal OPP staff and external stakeholders rely on different guidance materials causing confusion, inconsistent messaging, and eroding trust in the regulatory process.*	Develop a crosswalk or reference guide that clearly links internal training content to specific sections of official guidance. This tool would help ensure that both internal staff and external stakeholders understand how training materials align with formal policy, promoting transparency, consistency, and shared understanding.	------
OPP-wide Training Approach		EPA reviewers spend additional time on a given step because they are looking for training information.	*Each Division has its own system of internal training.*	Create a single location for all internal training at OPP.	Identify guidance documents in draft form that should be updated.
				Implement regular refresher courses for internal training, possibly in smaller, more digestible bites.	------
				Refresher Course: Consider annual refresher courses for the entire division.	Ensure training developed for the regulatory branch also interfaces with the science branch.
				Provide training on the registration process, branch roles and interactions, stakeholder engagement points, and final outcomes.	------
				Consider creating a training packet for PRD outlining what BEAD can provide, including example references and a 3–9 month activity preview.	------
				Create short, narrated videos (e.g., 1-minute clips) demonstrating field-based approaches.	------
				Create short, narrated videos (e.g., 1-minute clips) demonstrating real-world pesticide applications.	Engage the land grant university system to facilitate EPA staff shadowing opportunities informed by industry practices.
				Develop new staff guidance that applies to all OPP staff including existing templates, SOPs, and checklists	------

Table 3.3.2 Gaps Identified as Labeling Challenges

Labeling Challenges					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Label Reviews are Inconsistent	**Label Review training is diffuse across divisions and produces inconsistent label review results.**	New reviewers often question longstanding label claims, including non-pesticidal elements, which creates confusion and delays.	*There is inconsistency in how label language is reviewed.*	Develop training modules focused on label notifications to reduce variability and improve predictability.	------
		Registrants perceive the EPA is not transparent in its review.	*Stakeholders believe EPA maintains an internal "Label Table" that is not publicly shared.*	Develop a training system to help reviewers understand practical implications of label requirements, such as what a "100-ft buffer" looks like in the field. Use multiple modes of delivery:	------
				Develop and publish a standardized "Label Language Table" or guidance document to clarify acceptable terminology.	------
		Some labels have been rejected, only to be contradicted later by new guidance memos.	*The Label Review Manual is not updated frequently enough to reflect current policies and practices.*	Develop short videos to demonstrate specific application methods to label reviewers to improve labeling accuracy.	------
				Review and consolidate label review training materials across divisions into a single, comprehensive guide with examples of acceptable and unacceptable language.	------
				Develop a training to identify and provide understanding of the PRNs and policies guiding label review.	------
				Integrate a searchable, comprehensive list of PR Notices into the Label Review Manual or EPA's labeling webpage.	Set a recurring schedule (e.g., annually or biannually) to update the Label Review Manual.
		PRD not consistent with Labeling. Asking for changes that other divisions not aware of our not implemented by other divisions. PRD in particular a struggle lately		Develop an annual label review manual training.	Identify a team to annually review the label review manual and make updates.
	Label Reviewers do not have an understanding of the real-world implications of their review.	Applicants can lose multiple years of application.	*Label reviewers lack awareness of the real-world impacts of their decisions, leading to potential gaps in practical understanding and regulatory effectiveness.*	Develop training for EPA on how long takes to implement and the bottleneck of label printing – how the supply chain works.	------
		End users may have to comply with difficult constraints.		Training on what a delayed label review means for members.	------

Table 3.3.3 Gaps Identified as Perceived Transparency Issues

Perceived Transparency Issues					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Communication with Registrants	**Registrants are unaware of policy and review practice changes.**	Registrants are putting packages together based on outdated information.	*PRIA Quarterly Stakeholder Meetings should include regular updates on policy changes and review practices.*	Develop a training for EPA staff on how to publicly share policy or review practice changes.	Send an EPA representative to PRIA Coalition meetings to discuss any policy changes or changed review practices in OPP.
			Registrants often rely on past experience to prepare submissions, but find their approach out of date.	Develop a written guidance or documentation to support all policy or review practice changes.	------
Shared Trainings (EPA Staff & Registrants)	**Communication with registrants is not effective.**	The dynamic between regulators and industry can feel adversarial, hindering collaboration.	*There's a lack of transparency around required data and guidance documents.*	Develop trainings for staff on how to communicate actions with Registrants.	------
		The internal training process for OPP staff is largely unknown to external stakeholders, described as a "mystery."	*Ineffective communication with registrants leads to misunderstandings about internal processes, such as training and prioritization*	Provide some trainings as shared trainings for both EPA staff and registrants.	------
		Lack of transparency fosters mistrust and speculation, particularly around the handling of Experimental Use Permit (EUP) applications.		Provide shared training for EPA and registrants on evaluations of products requiring EUPs.	------

Table 3.3.4 Gaps Identified as Review Inconsistencies and Challenges

Review Inconsistencies and Challenges					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Requirements vs Best Practices	**Training for EPA Staff on legal requirements versus best practices is not available.**	Overruling Senior Staff Advice. Written advice from senior EPA staff is sometimes overruled by Branch Chiefs without clear justification, resulting in delays and, in some cases, unnecessary reformulation of products.	*Inconsistencies arise between the regulatory and efficacy teams, particularly when efficacy teams request label changes without clear communication on legal requirements vs best practice.*	Provide training content that clearly distinguishes between legal requirements, best practices, and reviewer preferences.	------
Checklists	**There is a lack of accurate, standardized checklists.**	Reduced efficiency and uniformity across submissions.	*The lack of up-to-date, reliable checklists leads to inconsistent reviews of registration packages.*	Updating existing checklists and providing context for the use of checklists.	------
CSF	**There is a lack of up to date CSF training.**	This inconsistency leads to confusion, delays, and a lack of predictability for registrants. Contradictory guidance from OPP staff—sometimes even within the same submission—undermines trust in the process.	*Inconsistent and Contradictory Reviews. Reviews of CSF amendments and other submissions often vary between reviewers.*	Develop training modules focused on CSF amendments and other common submission types to reduce variability and improve predictability.	Update the Confidential Statement of Formula (CSF) form or create a PIP-specific version to better reflect protein expression data.
				Develop CDX training module on how to complete and interpret the Confidential Statement of Formula (CSF), especially for PIP products.	------
				Provide refresher training for EPA reviewers and registrants on how CSFs for PIPs are completed.	------

Table 3.3.5 Gaps Identified as Topical Training Gaps

Topical Training Gaps					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
PRN 98-10	**EPA staff may misinterpret the scope of PRN 98-10**	EPA reviewers sometimes provide feedback on non-pesticidal elements of labels, which is outside the scope of PR Notice 98-10.	*There is an opportunity to misinterpret the scope of PRN 98-10.*	Develop a training module specifically on PR Notice 98-10 and its implications for label content.	------
				Develop a training module specifically on the scope of PR Notice 98-10 as it relates to legal authorities.	------
Pre-submission Forms	**EPA staff implementing reviews are not adequately supported in utilizing information from pre-submission agreements.**	Guidance provided during pre-submission meetings is frequently ignored during actual reviews. This creates uncertainty for registrants who rely on those meetings to align their submissions with EPA expectations.	*Pre-submission processes are unclear or inconsistently followed.*	Train staff on the importance of honoring pre-submission agreements unless formally superseded, with clear documentation required for any deviations.	Modify actions relating to what happens after a pre-submission meeting and how it is used later in the registration process
				Train staff on how to conduct and manage pre-submission negotiations effectively. Include guidance on improving transparency and communication with registrants.	Update and clarify the pre-submission consultation form to reflect current practices and waiver experience.
				A checklist of discussion points should be provided in advance by EPA.	A standardized form or template should be used to record decisions, with sign-off from all parties to ensure alignment and accountability.
				Decisions made during the meeting should be clearly documented in the submission package.	------
Data Requirements	**The data requirements for BPPD review products are not concisely defined.**	A lot of what gets submitted to BPPD is a data package that is negotiated in the consultation process with BPPD. This includes waivers, etc. Somewhere in here the negotiation goes through with BPPD and then the Tech Screen is with someone else in RD. Somewhere, some of the information from the negotiation gets lost.	*Pre-submission Consultation Issue: For BPPD review products, there is not a checklist for data requirements.*	Provide training on data requirements for BPPD review products.	Create a checklist for BPPD Data Requirements.

Table 3.3.5 Gaps Identified as Topical Training Gaps (continued)

Topical Training Gaps					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Field Training	**EPA staff lack practical, real-world understanding due to reduced site visits.**	This gap effects labeling accuracy and regulatory decisions.	*Role of Industry in Supporting Training - Industry and trade groups have contributed training materials (e.g., PowerPoints, documents) to EPA. It is unclear whether EPA tracks, maintains, or utilizes these materials effectively.*	Develop an onsite training for EPA staff about real world application methods (e.g., fumigation, crack and crevice, lawn treatments).	------
				Provide a formal platform across all of OPP to allow for industry trade groups to contribute training materials. E.g. set up a monthly schedule for Training Webinars.	------
		This effects the amount of time a review takes.	*Use patterns change quickly.*	Ensure AD has access to the most up-to-date information on use patterns.	------
			AD review relies on models and understanding inputs.	Provide trainings for AD on the use of models to better understand inputs and assumptions.	------
		A reviewer not understanding the LCL and demonstrating a product is efficacious can slow the review period. This issue has led to prolonged review times, as registrants often need to walk reviewers through the math.	*The AD team lacks sufficient training in the mathematical aspects of efficacy evaluations. A major challenge is explaining how to calculate the Lower Confidence Limit (LCL) and demonstrating that a product is efficacious at its lowest tested use rate.*	Develop Training on how to calculate the Lower Confidence Limit (LCL) and demonstrating that a product is efficacious at its lowest tested use rate.	------

Table 3.3.5 Gaps Identified as Topical Training Gaps (continued)

Topical Training Gaps					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Consolidated Guidance Documents, Best Practices, PRNs	***There is currently no centralized repository or platform that consolidates guidance documents, best practices, and procedural information relevant to EPA staff.***	Without a centralized, version-controlled repository, registrants struggle to find and use the most current guidance, leading to inefficiencies.	*There is no centralized version-controlled repository.*	Train both EPA staff and registrants in navigating a centralized, version-controlled repository with automatic push notifications for updates.	*Develop a centralized, authoritative source of review information for registrants:*
		It is difficult to find relevant policies and guidance.	*The OPP website is complex to navigate.*	Provide formal training sessions for internal EPA staff and external registrants when a new PRN is issued.	------
		There is no single, publicly accessible repository for all current guidance, exemptions, and PRNs.		Redesign the EPA OPP Website to include the consolidation and explanation of all PR Notices in an accessible format.	------
		Important guidance, such as the Herndon memo on CSF (2012), remains widely used, although being outdated. A formal update and designation are needed.		Redesign the EPA OPP Website to improve navigation and searchability for internal EPA staff and External Stakeholders. Remove outdated guidance documents not used in EPA reviews.	------
Data Submissions	**There is an absence of standardized procedures for EPA staff and registrants on utilizing CDX.**	*Many stakeholders, especially smaller or less frequent submitters, struggle with navigating the CDX portal due to lack of clear, accessible training.*	*CDX Challenges*	Develop comprehensive CDX training modules, including: -Include step-by-step guidance for submitting M009 forms and data waivers. -Clarify how to complete and interpret CSFs, especially for PIP products. -Use example-based training (e.g., "If submitting X, click here"). -Suggested formats: video tutorials, interactive walkthroughs, and webinars with Q&A.	Add a dedicated M009 submission button with clear labeling.
	Registrants are submitting incomplete packages even after having a pre-submission meeting.	Incomplete packages submitted by applicants result in delays.	*Incomplete packages and status tracking are recurring issues.*	Develop a training for EPA staff and External Stakeholders on how a registration package is created from a data package.	Automate the initial completeness check.
				Develop a training on developing chemical packages which is delivered to EPA employees and registrants.	Create an intake method that doesn't require the applicant to reload an entire package when changing only a small portion of the registration.
				------	Provide standardized materials and checklists for packages.
				------	Explore ways to streamline EUP-to-dossier transitions to avoid repetitive data submissions.

Table 3.3.5 Gaps Identified as Topical Training Gaps (continued)

Topical Training Gaps					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Front-end Screen	**Technical Screening processes are not clearly defined.**	Delayed Reviews.	*Although numbers and codes are assigned, products are ending on the wrong desk.*	Develop training on the assignment of MRID numbers.	Develop an automated process for assigning MRID numbers.
			There are specific issues with Form 8570-01 during front-end processing.	Develop a joint training for EPA staff and registrants on 8570-01.	------
		Miscommunication between Registrants and Reviewers,	*Registrants perceive that the Technical Screen*	Develop training for registrants on the distinction between technical screen and science review.	------
				Improve guidance for reading and interpreting forms.	------
Process Navigation	**Registrants do not have enough information to adequately navigate AD processes.**	Sometimes a second variety for PIP products goes through a new registration for a product and receives a different set of questions and reviewer feedback. This creates a conflict when a 2nd variety goes through and has different questions.	*Identifying the correct Antimicrobial review guidance is convoluted for EPA staff and Registrants.*	Develop a dedicated Antimicrobial Review Manual to address the unique challenges and regulatory nuances of antimicrobial products.	Find a way to allow a re-submission for PIP products like apples, potatoes, strawberries, etc. rather than having a full new submission for each variety.
	EPA Staff do not have enough information to adequately navigate RD processes.	Registrants have different expectations than EPA staff.	*The Registration process is difficult to understand.*	Develop standardized training for both EPA staff and external stakeholders on how to navigate RD processes, reducing reliance on internal, proprietary knowledge.	------

Table 3.3.5 Gaps Identified through the Process Flow Mapping

Process Flow					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Process	**Process Flow Steps**	Staff must use informal mentoring or seek out approaches to moving a registration through a given flow step.	*The workflow process of any registration in OPP is extremely complex, with most products requiring product-specific process flows.*	*Develop new (or identify existing training resources) to support the following RD process steps:*	
				-21 Day Screen. Develop front end screening training materials on the 21 day screen and package review.	Develop automated tools to support the front end screening, where possible.
				- Develop internal training and guidance on the goals, objectives, and running of a pre-submission meeting.	------
				- Pre-Submission Meeting Follow Up. Provide training in the form of supporting documentation to describe a standardized process for follow up on the pre-submission meeting and how this integrates with later steps of submission.	Develop a training or supporting documentation to outline the expectations of a pre-submission meeting and expected follow up steps.
				- Review of Special Local Needs. Provide training in the form of supporting documentation for a special local needs application.	------
				- Provide training in the form of supporting documentation for the review and processing of EUPs.	------
				-First Team Meeting. Develop internal training and guidance on the goals, objectives, and running of a First Team Meeting.	------
				-Reduced Risk Meeting. Develop internal training and guidance on the goals, expected contributions, and running of a Reduced Risk Meeting.	------
				-Develop written guidance on determining if risks in the **Risk Assessments are reasonable.** Identify specific contributions HED/EFED/BEAD.	Share written guidance on how OPP will determine if the risks identified in the Risk Assessments are reasonable.
				- Develop training on Section 18 Review to BEAD, EFED, HED	------
				-Develop training on developing a Proposed Interim Decision.	------
				-Develop guidance on review steps required to move a proposed interim decision becomes an interim final decision (e.g. reviews from PM, RAB BC, BC, DD, OD) and CBI Review form	Share review steps with Registrants.
				-Develop guidance on how to upload a decision to FDMS.	------
				-Develop guidance on the review steps needed for a Draft Registration Notice to become a Final Review (e.g. PM Review, BC Review, signatures, etc.)	------
				- Develop training on the development of a Data Evaluation Record (DER), movement of DER, and peer review.	------
				- Develop training on the movement of a document from a ROCKS Memo to Scenario Modeling	------
				-Develop Data Compensation Review training materials.	------
				-Develop training materials and written guidance on the paperwork steps needed for a New Product.	Share written guidance on the paperwork or steps that are needed following a determination

Table 3.3.5 Gaps Identified through the Process Flow Mapping (continued)

Process Flow					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Process	**Process Flow Steps**	Staff must use informal mentoring or seek out approaches to moving a registration through a given flow step.	*The workflow process of any registration in OPP is extremely complex, with most products requiring product-specific process flows.*	*Develop new or identify existing training resources to support the following EFED process steps:*	
				-Problem Formulation Template: Develop a template and associated training/SOP for use of template for the Problem Formulation Document.	------
				-Develop a training on how to Peer Review a DER.	
				-Develop training materials on the steps required to take a DER from Draft to Final.	
				-ROCKS Memo Template: Develop a template and associated training/SOP for the use of template for developing the ROCKS Memo.	
				-Develop a training on when Scenario Modeling is appropriate, the steps needed to instigate scenario modeling, and the expected time needs of scenario modeling. This should be created to be applicable to multiple divisions.	
				- Develop written guidance on how to review a New Chemical Package.	
				- Identify existing, or develop new training materials on how to develop a Reduced Risk Memo.	
				-Develop training materials on how to communicate workorders to contractor.	
				- Develop training materials to describe how to complete an Emergency Exemption Review. This should be created to be applicable to multiple divisions.	
				-Develop training materials to describe how to complete a Drinking Water Assessment.	
				-Develop training materials to describe how to complete an Ecological Assessment.	

Table 3.3.5 Gaps Identified through the Process Flow Mapping (continued)

Process Flow					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Process	**Process Flow Steps**	Staff must use informal mentoring or seek out approaches to moving a registration through a given flow step.	*The workflow process of any registration in OPP is extremely complex, with most products requiring product-specific process flows.*	*Develop new or identify existing training resources to support the following BEAD process steps:*	
				- Develop training materials to describe how to complete an Emergency Exemption Review. This should be created to be applicable to multiple divisions.	------
				-Develop training documents on how to develop and provide Benefits/Impacts drop-in language for Proposed Interim Decisions and Interim Final Decisions.	
				-Develop training documents on how to develop and provide Use/Usage Drop In Language for PWPs, FWPs, and Interim Final Decisions for PRD.	
				-Develop training documents on how to complete an economic analysis for the Proposed Interim Decision.	
				-Develop training on how to develop a Data Evaluation Record. This training could be jointly shared between divisions.	
				-Update Rate Distribution and SUUM SOPs.	
				Develop new or identify existing training resources to support the following HED process steps:	
				-Develop training guidance on how to develop and submit a RARC.	------
				- Create a crosswalk or reference guide that clearly links HED training content to specific sections of official guidance. This helps both internal staff and external stakeholders understand how training aligns with formal policy.	
				Embed official guidance into training materials through direct references or excerpts to reinforce authority and reduce reliance on interpretation.	

Table 3.3.5 Gaps Identified through the Process Flow Mapping (continued)

Process Flow					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Process	**Process Flow Steps**	Staff must use informal mentoring or seek out approaches to moving a registration through a given flow step.	*The workflow process of any registration in OPP is extremely complex, with most products requiring product-specific process flows.*	*Develop or identify existing training resources to support the following BPPD process steps:*	
				- Develop training materials to describe how to complete an Emergency Exemption Review. This should be created to be applicable to multiple divisions.	
				-Develop training materials on how to develop a PWP	
				-Develop training materials on how to develop incorporate comments into an FWP	
				Develop training on when and how to initiate a Data Call-'-In, including data format and processing timelines.	
				-Develop training on how to process comments and write a Pre-Decisional Letter	
				-Develop training on how to develop Science Preliminary Tech Screen: PC/HH	
				-Develop training on how to develop Science Preliminary Tech Screen: ECO	
				-Develop training on how to develop Science Preliminary Tech Screen: Efficacy Tech Screen	
				-Develop training on how to develop IRM	
				-Develop training on how to utilize documentation for the Regulatory Technical Screen (e.g. 10 day letter, PM/SRA 10 day letter, Reg BC and RAB BC 10 day letter)	------
				-Develop training on the approval and submittal of the Final Tech Screen Decision.	
				-Develop training on how to conduct a Science Committee Review	
				-Develop training to provide additional support for ESA determinations. More detail is needed on how these determinations are conducted for this division and in support of other divisions.	
				-Develop guidance on the process and timing of review for proposed documents (PID, Tolerance Exemption & FFDCA Supporting Document, OPP One Pager.	
				-Develop guidance for how product registration is processed, including review steps, for Registrants	
				-Develop guidance on how to get a draft tolerance into the federal register.	
				-Develop guidance on how to get your proposed decision document signed and reviewed.	
				-Develop training on developing an OPP One Pager.	

Table 3.3.5 Gaps Identified through the Process Flow Mapping (continued)

Process Flow					
Keywords	**Gap**	**Impact**	**Challenge**	**Training-Related Action**	**Non-Training Action**
Process	**Process Flow Steps**	Staff must use informal mentoring or seek out approaches to moving a registration through a given flow step.	*The workflow process of any registration in OPP is extremely complex, with most products requiring product-specific process flows.*	*Develop new or identify existing training resources to support the following PRD process steps:*	
				-Develop guidance on developing the Tolerance/Tolerance Exemption	------
				-Develop guidance on how the Management Review of Proposed Documents is conducted.	
				-Develop training on the development of the OPP One Pager. This should be consistent across divisions.	
				-Develop guidance on the Pre-Decisional Letter and Label	
				-Develop guidance on the use of the CBI Review form.	
				-Develop guidance on the process and timing of review for proposed documents (PID, Tolerance Exemption & FFDCA Supporting Document, OPP One Pager.	

Appendix A: Training Materials Inventory *(Excel Document)*

Appendix B: Internal Needs Assessment Executive Summary

Inventory and Needs Assessment Process

During the Inventory and Needs Assessment processes, Points of Contacts were identified within each of the seven Office of Pesticide Program Divisions. A request was made by Jeffrey Chang, COR for this contract, and the Jacobs team for the POC to provide access to training materials used for internal staff training. The information provided by each division had significant variation. The DRAFT results of the Inventory have been shared in the EPA SharePoint.

Each POC was also asked to participate in at least one Feedback Session with Jacobs' staff to further identify Current Training Practices, Key Issues of interest for internal trainings, Priorities for growth of internal training, and Proposed Solutions. Information collected during the inventory was used to inform and develop an initial line of questions for the POCs. The initial line of questions was approved by Seiichi Murasaki, in the absence of Jeffrey Chang, COR. This document summarizes the findings of Feedback Sessions between Jacobs staff with:

- Fungicide Branch, Registration Division (RD)
- Linda Arrington and Matt Khan in the Pesticide Re-Evaluation Division (PRD)
- Elizabeth Donovan, Associate Director Antimicrobials Division (AD)
- Lindsay Roe, Branch Chief of the Herbicides Branch and James Orrock of the Shannon Borges, Deputy Director Biopesticide and Pollution Prevention Division (BPPD)
- Monica Wait, Environmental Risk Branch II Chief, Environmental Fate and Effects Division (EFED), as well as GT Harraka, Jessica Joyce, and Rebecca Lazarus
- Lindsey Hendrick, Biological and Economic Analysis Division (BEAD)
- Thomas Moriarty, Health Effects Division (HED)

Common Themes

Each Feedback Session provided unique information, specific to the division, as well as information that was common between divisions. The summary of each feedback session is framed with respect to PRIA 5 provisions:

1. *Improving Officer and Employee scientific, technical, and administrative skills* - Improving Officer and Employee ability to administer the pesticides program for scientific, technical, and administrative skills.
2. *Aligning OPP actions with EPA competencies* (reinforcing science, protecting environmental health, and engaging partners)
3. Addressing best practices for *Operational Performance and Improvements*
4. Improving *Administrative Process and Procedures*
5. Promoting *Consistent Regulatory Decision-Making*
6. *Educating Registrants* and regulated stakeholders on regulatory procedures.

Current Training Practices

- **Training Approach.** Each Division has their own, unique approach to providing internal training for both new employees and continuing education for experienced employees. (*Improving Officer and Employee ability to administer the pesticides program).*
    - **Training Committees.** For example, RD, PRD and EFED have all identified a training team or committee and generally have a structure to how trainings will occur for both new hires and continuing education. AD utilizes new employee training that happens once per year and primarily utilizes written documents such as SOPS, guidance documents, and salesforce articles to support training for staff. BEAD and BPPD similarly utilize written guidance as the primary training tool for employees, while they both also utilize informal mentoring and one-on-one trainings.
    - **Mentoring:** RD and PRD have an official mentoring system and assign mentors. BPPD and BEAD have an informal mentoring approach. EFED does not utilize mentoring. AD does not mention a mentoring approach although new staff are trained on an individual basis, as needed.
- **Stakeholder Engagement:** There are varying degrees of Stakeholder Engagement and Industry Involvement across the Divisions as far as training provided by external organizations. (*Aligning OPP actions with EPA competencies).* This can largely be attributed to the varying degrees which a given division will have interaction with the applicants. For example, RD interacts with applicants regularly and therefore has

guidance, and templates for the applicants. Conversely, BEAD has limited interaction with applicants and therefore has no training that has application to applicants.

- **Training Materials.** Training materials for each Division are often housed in multiple platforms, including SharePoint, G: Drive, team leader file folders, and Knowledge Articles.
- **Office Hours.** RD and PRD both offer regular office hours. RD has an assigned training lead who has been in this position for several years. PRD also assigns someone to lead the office hours, but this person rotates every couple of years within PRD. Some Divisions offer as needed Office Hours.

Key Issues Identified related to internal staff training:

Key issues were identified by each of the divisions.

Difficulty Finding the Training Materials. (*Improving Officer and Employee ability to administer the pesticides program)* One common them amongst most of the Divisions was that the internal training materials can be difficult to locate, which results in junior staff or staff new to a task requiring assistance from more experienced staff. Sometimes this happens because the staff forget that a training material exists, forget where the material exist, or can't get access to the training material.

Cross-Divisional Understanding is Lacking. (*Aligning OPP actions with EPA competencies)* Multiple POCs identified that staff were well equipped with the competencies needed to complete their task efficiently, but did not have an understanding of how their role and deliverables fit into the broader pesticide registration process.

Workflow Management. (*Operational Performance and Improvements)* Workflow management and the technical tools to support the workflow was consistently identified in each division as an issue that makes completing their role more difficult. In some cases, the difficulty was identified as the result of divisions not understanding what their product is used for by other divisions, in some cases the difficulty stemmed from not being able to track what another division was doing, and in some cases this was the result of inconsistent approaches to SOPs and naming conventions within Salesforce.

Priorities

Priorities for improving employee training and efficiencies varied widely between each division. Workflow improvements were one area where most divisions had similar priorities.

- **Workflow Improvements** (*Administrative Process and Procedures)*
    - **Communication and Tracking.** Communication and tracking was consistently brought up as a priority amongst each of the Divisions.
        - Salesforce was specifically identified as a priority because it is a pain point which made communication and tracking difficult.
        - Identifying and implementing other approaches to improving workflow management and communication between Divisions were also prioritized.
    - **Central Location for Training Materials.** Identifying a single method or location to house training materials was a priority for most Divisions.
- **Written Guidance Updates.** (*Improving Officer and Employee ability to administer the pesticides program).* Updating and developing new guidance was identified by five of the divisions. Each division identified specific subject-matter areas that they would focus on first.
- **Developing Cross-Divisional Training.** (*Aligning OPP actions with EPA competencies)* Each division identified that a certain amount of training that was OPP-wide would be valuable to the Division. They further identified that each Division's training materials should be cross-referenced such that any Division could utilize another Division's training materials.

Proposed Solutions

- **Training Suggestions** (*Improving Officer and Employee ability to administer the pesticides program)*
    - Training Cycle: Implement regular refresher courses for internal training, possibly in smaller, more digestible bites.
    - Cross-Division Utility: Identify if training is useful for other divisions.
    - Create a more engaging and approachable SharePoint space with searchable information.

- Stakeholder Engagement: Work with stakeholder groups on benefits and use patterns. Regular updates on external stakeholders are needed.
- Update Trainings and Processes: Ensure the latest and greatest processes are included. (*Operational Performance and Improvements)*

- OPP-wide suggestions (*Aligning OPP actions with EPA competencies)*
  - **Refresher Course:** Consider annual refresher courses for the entire division.

  - Unified Approach
    - Look across SOPs, guidance, and training materials across all registration divisions to overcome current roadblocks.
    - Ensure training developed for the regulatory branch also interfaces with the science branch.
- External (*Educating Registrants)*
  - Update the guidance (publicly available) for registrants who use the templates for data evaluation records (evaluate study submissions). e.g. how to use these templates, why to use them, etc.

Appendix C: Process Maps

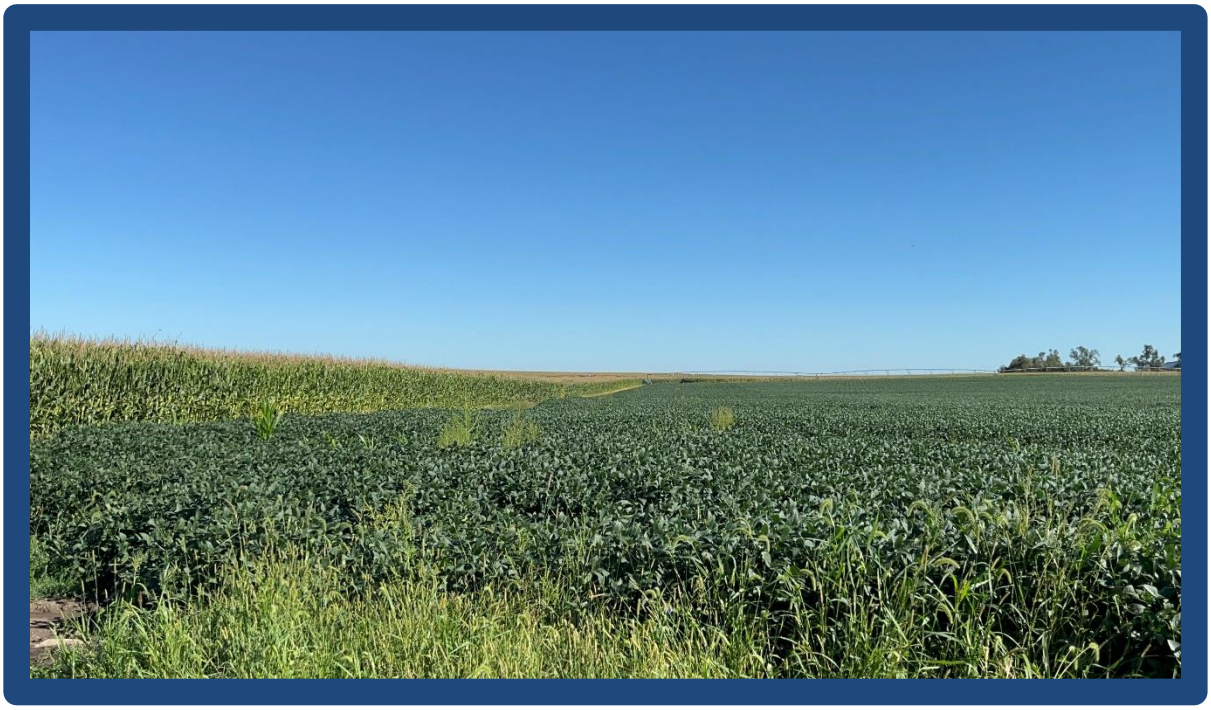
Appendix D: External Stakeholder Executive Summary

External Stakeholder Feedback Sessions Summary

EPA Office of Pesticide Programs

Support for Developing and Administering Training for Pesticides Programs

June 17, 2025



Contents

Executive Summary - External Stakeholder Feedback Sessions

Introduction

This document summarizes the feedback from eight external stakeholders regarding the Office of Pesticide Programs (OPP) registration process, training needs, and suggestions for improvement. The feedback sessions covered various aspects based on the extensive experience of each stakeholder. The stakeholders were identified as Points of Contact (POCs) following one-on-one meetings between the PRIA Coalition Coordinator Laurie Flanagan and Jacobs Engineering, and subsequent presentations to PRIA Coalition members outlining goals and expected contributions to the feedback sessions. The stakeholders interviewed were:

- Anastasia Swearigen, American Chemistry Council (ACC)
- John Dunmore, Biological Products Industry Alliance (BPIA)
- Lois Rossi, Responsible Industry for a Sound Environment (RISE)
- MJ McNamee, Animal Health Institute
- Nicole Juba, Biotechnology Innovation Organization (BIO)
- Rachel Hardie, CropLife America
- Ray McAllister, Council of Producers and Distributors of Agrotechnology
- Steven Bennet, Household and Consumer Products Association (HPCA)

Overall Observations

The feedback from the stakeholders highlighted several key observations regarding the OPP registration process. There were six key themes in the overall observations that were shared:

Relationship and Communication Dynamics are Important to Registrants.

- Several stakeholders noted good working relationships with specific divisions or staff, and that EPA staff are approachable and professional in their interactions.
- There is a shared sense of responsibility emerging between EPA and industry, suggesting that staff are fostering a more collaborative regulatory environment. Although the dynamic between regulators and industry can feel adversarial, this shift is seen as positive.
- The stakeholder feedback reveals that EPA is increasingly open to receiving and acting on feedback, though there are still areas where this responsiveness could be improved.

Delays and Inefficiencies in the Registration Process influence Registrants Priorities for OPP

- Prolonged review timelines and missed PRIA deadlines are common, with some reviews taking up to four years and delays often caused by sequential reviews, sign-off bottlenecks, and technical screen issues.
- Process inefficiencies—such as slow completeness checks, delayed notifications, and the EUP-to-dossier loop—compound delays and disrupt planting and product launch timelines.

- Lack of automation and poor status tracking contribute to recurring issues with incomplete packages and hinder transparency in the registration process.

Inconsistency in Review Practices and Training Gaps

- Review inconsistencies across divisions and reviewers—including label language interpretation, CSF handling, and formatting standards—lead to unpredictable outcomes and delays.
- Lack of alignment between internal practices and public guidance creates confusion for registrants, who often tailor submissions to individual reviewer preferences.
- Training gaps and reliance on informal processes contribute to inconsistent screening and a disconnect between internal tools and external expectations.
- EPA staff lack practical, real-world context, including site-based knowledge and understanding of application methods.
- Training resources are outdated or unclear, especially regarding legal requirements versus preferences.
- Registrants and staff lack shared, structured training, particularly for navigating submission systems like CDX and the Registration Division.

Lack of Transparency and Accessibility

- Stakeholders face difficulty accessing clear, current guidance, with regulatory documents scattered, outdated, or unfinalized, and no centralized, authoritative source of review information.
- Uncertainty about the validity of public-facing materials, including those on the EPA website, creates confusion and undermines confidence in the registration process.
- Opaque internal processes, such as sign-off procedures and internal training, leave external stakeholders in the dark about how decisions are made and what standards are applied.

Website and Information Management Issues

- Stakeholders face difficulty accessing clear, current guidance, with regulatory documents scattered, outdated, or unfinalized, and no centralized, authoritative source of review information.
- Uncertainty about the validity of public-facing materials, including those on the EPA website, creates confusion and undermines confidence in the registration process.
- Opaque internal processes, such as sign-off procedures and internal training, leave external stakeholders in the dark about how decisions are made and what standards are applied.

Loss of Institutional Knowledge and Succession Planning

- Loss of institutional knowledge due to retirements is a growing concern, with no clear succession planning in place.
- Overreliance on informal mentoring leaves gaps in training and continuity.
- Stakeholders want a formal strategy to preserve expertise and ensure consistent knowledge transfer.

EPA Internal Training Approaches Considered Highly Productive

Certain ongoing actions and past training actions are considered highly productive by external stakeholders. These include:

- The AD Efficacy Team Mailbox is consistently responsive, professional, and efficient; also serves as a training tool for onboarding new reviewers.

- Pre-submission meetings are well organized and appreciated by registrants for clarifying expectations.
- Archived on-site training was noted as a past strength.
- EPA's willingness to update key guidance documents (e.g., PRN 98-1, 98-10, Herndon Memo).
- EPA's engagement with industry through the PRIA Coalition.
- Association-led training: Registrants are trained on the registration process; EPA staff are invited to attend.

Challenges for OPPs Registration Process and Internal Training

The stakeholders identified several challenges in the OPP registration process and internal training:

Administrative Challenges

- Making PRIA dates are a challenge.
- The current review workload is unsustainable, with some reviews taking up to four years.
- Sign-off delays causing missed PRIA deadlines and planting seasons. BIO members report reviewers completing initial reviews and then the package waiting for signature for months.
- There is no centralized system to document case decisions and their broader applicability. A workflow should be established to record decisions that can be referenced by other reviewers to ensure consistency.
- Sometimes a second variety goes through a new PIP registration for a product and receives a different set of questions and reviewer feedback. This creates a conflict when a 2nd variety goes through and has different questions.
- Unfinalized Draft Guidance:
    - Many guidance documents remain in draft form for years, creating uncertainty for registrants. Example: The Draft Guidance for Plant Regulator Products and Claims (including Biostimulants) is widely used but lacks finalization, making it unreliable.
- There is uncertainty about whether the materials on the EPA website are current.
- Registrants want clarity on:
    - Which guidance documents are most frequently used by EPA staff?
    - When those documents are updated or replaced
    - The level of internal review and approval behind each document
    - Commonly referenced resources include:
        - Regulations
        - PRNs (Pesticide Registration Notices)
        - A wide variety of formal and informal guidance documents, policies, letters, and memos
- The Pesticide Registration Manual, which is promoted as authoritative but may be outdated in practice.
- The Council raises a critical question: Does the current system unintentionally incentivize reviewers to find issues in submissions? This could lead to unnecessary scrutiny or inconsistent feedback, especially in the absence of clear, shared standards.

Labeling Challenges

- There is significant inconsistency in how label language is reviewed. New reviewers often question longstanding label claims, including non-pesticidal elements, which creates confusion and delays.
- Understanding what constitutes acceptable label language (e.g., "bathroom surfaces" vs. "tile") is critical, yet interpretations vary widely.
- Stakeholders believe EPA maintains an internal "Label Table" that is not publicly shared, leading to inconsistent decisions:
- Some labels have been rejected, only to be contradicted later by new guidance memos.

- Registrants often receive a Master Label from EPA, while states may require different versions, adding complexity and administrative burden.
- Label Review Manual
    - The Label Review Manual is not updated frequently enough to reflect current policies and practices.
    - There is a strong desire for an Antimicrobial Review Manual, though stakeholders acknowledge this would be a significant undertaking.
    - At a minimum, the manual should include:
        - A curated list of helpful resources and links to relevant EPA guidance documents.
        - Clear explanations of label review policies to help streamline both federal and state-level reviews.
        - Regular updates to ensure consistency in pesticide labeling.
        - A comprehensive list of PR Notices, either on the EPA's labeling webpage or integrated into the manual.

Perceived Transparency Issues

- Lack of transparency around acceptable label language contributes to delays and missed deadlines.
- PRIA Quarterly Stakeholder Meetings should include regular updates on policy changes and review practices.
- All policy evolutions or procedural changes should be accompanied by written guidance or documentation to ensure clarity and consistency.
- Pre-submission processes are unclear or inconsistently followed.
- There's a lack of transparency around required data and guidance documents.
- The dynamic between regulators and industry can feel adversarial, hindering collaboration.
- Registrants have a theory that when they apply for an EUP, EPA doesn't feel like there is pressure to work on the product. Then the companies wonder if there is some de-prioritization of working on the product review.
- The internal training process for OPP staff is largely unknown to external stakeholders, described as a "mystery."

Review Inconsistencies and Challenges

- Inconsistencies often arise between the regulatory and efficacy teams, particularly when efficacy teams request label changes without clear alignment on what is a legal requirement versus a best practice or preference.
- While the AD Efficacy Team Mailbox is efficient, the team lacks sufficient training in the mathematical aspects of efficacy evaluations. A major challenge is explaining how to calculate the Lower Confidence Limit (LCL) and demonstrating that a product is efficacious at its lowest tested use rate. This issue has led to prolonged review times, as registrants often need to walk reviewers through the math.
- Inconsistent and Contradictory Reviews. Reviews of CSF amendments and other submissions often vary between reviewers. This inconsistency leads to confusion, delays, and a lack of predictability for registrants. Contradictory guidance from OPP staff—sometimes even within the same submission—undermines trust in the process.
- Disregard for Pre-Submission Guidance. Guidance provided during pre-submission meetings is frequently ignored during actual reviews. This creates uncertainty for registrants who rely on those meetings to align their submissions with EPA expectations.
- Overruling Senior Staff Advice. Written advice from senior EPA staff is sometimes overruled by Branch Chiefs without clear justification, resulting in delays and, in some cases, unnecessary reformulation of products.

- Delays in Core Processes. Significant delays persist in label reviews, notifications, and the updating of company contacts—especially during ownership transfers. These delays ripple through the registration process and affect state-level approvals.
- Lack of Accurate, Standardized Checklists:
    - The absence of current and reliable checklists contributes to inconsistencies in registration package reviews.
- Regulatory Confusion
    - Guidance and regulations are scattered, outdated, or superseded, making it unclear what's current for both EPA staff and stakeholders.
- Registration Delays
    - The process is slow, often missing PRIA deadlines—especially for new label claims.
    - Even low-volume registrants (1 product/year) are significantly impacted.
- There is a recurring issue of inconsistent decisions between reviewers, even within the same division. This inconsistency creates confusion and inefficiencies, especially when guidance documents are outdated or contradicted by internal practices.
- Registrants often rely on past experience to prepare submissions, only to be told by reviewers that "we don't do it that way anymore," without any public update or notice.
- Label claims group, pet products, very inconsistent and usually surfaced a week before the registration is due.
- Label amendments and markups right before PRIA date an ineffective process and requires discussion.
- PRD not consistent with Labeling. Asking for changes that other divisions not aware of our not implemented by other divisions. PRD in particular a struggle lately and they seem to do their own thing then give you 12 months (little time) to make changes AFTER they had it for 3-4 years.

Perceived Training Gaps

- There is a persistent lack of clarity between what EPA considers a legal requirement versus a best practice or preference—this distinction should be emphasized in training, especially for new reviewers.
- EPA reviewers sometimes provide feedback on non-pesticidal elements of labels, which is outside the scope of PR Notice 98-10. This is a key training topic for new staff.
- Inconsistent Training Delivery:
    - Training across OPP divisions lacks uniformity, leading to varied interpretations and practices among staff.
- Outdated or Incomplete Reference Materials:
    - There is a pressing need to update and maintain key documents, including the training manual, registration manual, and PR Notices, to ensure staff have access to current guidance.
- Communication Gaps Among Product Managers (PMs):
    - Better mechanisms are needed for PMs to communicate and share insights, which would help align decisions and reduce variability in reviews.
- Training and Knowledge Gaps
    - EPA staff lack practical, real-world understanding due to reduced site visits.
    - Archived training is outdated; there's a need for a modern, comprehensive training program.
    - No shared training exists for navigating the Registration Division (RD); companies rely on internal, proprietary knowledge.
- Inconsistencies in Reviewer Expectations:
    - Registrants often tailor submissions to individual reviewer preferences, even when following the Label Review Manual, due to inconsistent enforcement of formatting and content standards.

- Regulatory managers note a lack of understanding among reviewers about real-world application methods (e.g., fumigation, crack and crevice, lawn treatments). This gap affects labeling accuracy and regulatory decisions.
- Disconnect Between Internal and External Resources- There is a perceived divide between what EPA staff use internally (e.g., informal tips and tools) and what is available to registrants. EPA staff may prioritize efficiency tools, while registrants seek formal, codified guidance to ensure compliance. This disconnect contributes to misalignment and frustration during the registration process.
- Role of Industry in Supporting Training - Industry and trade groups have contributed training materials (e.g., PowerPoints, documents) to EPA. It is unclear whether EPA tracks, maintains, or utilizes these materials effectively.
- EPA and stakeholders both find confusion on defining what's a drug, what's a pesticide and who has jurisdiction. For example, since 1970 NWSW should be EPA and getting pushed to CVM.

Lack of Centralized, Accessible Guidance

- The absence of a centralized, version-controlled repository for guidance documents leads to confusion and inefficiencies. Registrants often struggle to determine whether they are using the most current and applicable guidance.
- The OPP website is poorly organized, making it difficult to find relevant policies and guidance. Improved organization would benefit both internal and external users.
- The EPA website is not easy to search and find resources.
- Reviewers often lack awareness of existing guidance documents, exemptions, and PRNs, or are unclear on their current status.
- Some guidance was not uploaded to centralized portals during past administrative transitions, leading to confusion about its validity. Example: A long-standing exemption for pheromone trials (250-acre threshold) was not recognized by EPA, causing an 8-month delay and requiring industry intervention via BPIA to resolve.
- Need for a centralized, authoritative source of review information for registrants:
    - There is no single, publicly accessible repository for all current guidance, exemptions, and PRNs.
    - This gap forces reliance on institutional memory, which is inconsistent and vulnerable to staff turnover.
    - Division POCs have acknowledged the need for a centralized, organized system for referencing guidance.
- Important guidance, such as the Herndon memo on CSF (2012), remains widely used, although being outdated. A formal update and designation are needed.

Registrant Submission Challenges

- Many stakeholders, especially smaller or less frequent submitters, struggle with navigating the CDX portal and EPA submission processes due to lack of clear, accessible training.
- Incomplete packages and status tracking are recurring issues.
- The completeness check process takes too long and could be automated.
- Technical Screen (Front End Screen Process):
    - Although numbers and codes are assigned, products are ending on the wrong desk.
    - The Technical Screen appears to be inconsistent. This causes difficulties for developers because the clock doesn't start until they go through the front-end screen.
    - Registrants perceive that the Technical Screen tends to ask questions that are really meant for the registration process. This is an issue as registrants have only 10 days to respond at the Technical Screen versus 75 days during the review.
    - Registrants have to reload the entire package when an issue arises, even on a single page.
    - Products often get stuck in an "Infinite Loop": Technical screen should be 'do you have all of the pieces you need for the science evaluation?' They end up in an infinite loop - to run trials,

you need an EUP permit. Getting this EUP permit takes 12 months. Then they can do a trial. Then they do submission.
    - There are specific issues with Form 8570-01 during front-end processing.
- EUP Issue:
    - In order to have enough data for a dossier, a registrant may need additional acreage. To get this data, an EUP (Experimental Use Permit) is needed. It takes 12 months to get the permit data. Then data is generated for 1 year. Then there is a second application for EUP2 to keep the 2nd crop in the field. In the meantime, the registrant is hoping the PRIA date gets done so they don't have to keep the crop in the field or submit a third EUP.
    - Pre-submission Consultation Issue: For BPPD review products, there is not a checklist for data requirements. So, a lot of what gets submitted to BPPD is a data package that is negotiated in the consultation process with BPPD. This includes waivers, etc. Somewhere in here the negotiation goes through with BPPD and then the Tech Screen is with someone else in RD. Somewhere, some of the information from the negotiation gets lost.
- PIP Issues
    - PIP products should have the opportunity to do a re-submission similar to what is done in corn, however products for things like apples, potatoes, strawberries, etc. have to submit a whole new product submission for each variety.
    - Sometimes a second variety goes through a new registration for a product and receives a different set of questions and reviewer feedback. This creates a conflict when a 2nd variety goes through and has different questions.

Institutional Knowledge Concerns

- There is concern about the loss of institutional knowledge as experienced staff retire, and a lack of visible succession planning exacerbates this issue.
- Most training appears to rely on informal mentoring, which becomes problematic during staff turnover or retirements.
- Overreliance on informal mentoring creates vulnerabilities, especially during staff turnover or retirements.

Suggestions for New Training Materials or Approaches

The stakeholders provided several suggestions for new training materials or approaches.

General Comments

- Develop a Uniform, Consistent Training Program:
    - Implement a uniform training program across all OPP divisions to ensure consistent understanding and application of policies.
    - Include online training modules that staff can complete independently, with supervisor oversight to verify completion.
    - Ensure the program is sustainable and regularly updated to reflect evolving regulatory needs.
- Inclusive Training for Registrants
    - Any new or updated training that affects how EPA conducts reviews should also be made available to registrants to ensure alignment and transparency.
- Collaborate with the American Chemistry Council's Center for Biocides to develop templates or guidance for registrants to present efficacy data more clearly.
- Ensure Alignment Between Internal and External Training Materials
    - Standardize and synchronize the training materials used internally by EPA staff with those available to registrants. Where differences exist, provide clear explanations to avoid confusion and ensure consistent expectations across all stakeholders.

- Training materials and program provided to EPA staff on how to review and assess registration should also be provided to registrants.

Label-Specific Training

- Label Language Training
    - Develop targeted training modules on how to review and interpret label language, including examples of acceptable and unacceptable phrasing.
    - Develop and publish a standardized "Label Language Table" or guidance document to clarify acceptable terminology.
- Label Review Manual Enhancements
    - Update the Label Review Manual on a regular schedule to reflect current policies and practices.
    - Include a curated list of helpful resources and links to relevant guidance documents.

OPP-wide Training

- Cross-Team Alignment
    - Create joint training sessions for both regulatory and efficacy teams to ensure a shared understanding of label requirements and reduce internal inconsistencies.
- PR Notices Training Module
    - Create a comprehensive training module that covers all PR Notices.
    - Establish a single, public-facing website that consolidates and explains all PR Notices in an accessible format.
    - Develop a training module specifically on PR Notice 98-10 and its implications for label content.
- Create training content that clearly distinguishes between legal requirements, best practices, and reviewer preferences.
- Clarification of Decision Authority
    - Provide training on the roles and limits of authority within OPP, including escalation protocols and the conditions under which Branch Chiefs may override prior guidance.
    - Deliver scenario-based training that clearly distinguishes between what qualifies as a notification versus an amendment, including how to respond to rejections.
- Process Efficiency and Workflow Management
    - Educate staff on workflow best practices and communication strategies, especially in coordination with state partners.
    - Train both EPA staff and registrants in navigating a centralized, version-controlled repository with automatic push notifications for updates.
    - Provide formal training sessions for both internal EPA staff and external registrants whenever a new PRN is issued.
- Train staff on the importance of honoring pre-submission agreements unless formally superseded, with clear documentation required for any deviations.
- Clear and Comprehensive Manuals:
    - Provide a crystal-clear training manual and a label review manual to guide both new and experienced staff.
    - Ensure these manuals are regularly updated and reflect current regulatory expectations.
- Improve Training on Pre-Submission and Communication Protocols
    - Train staff on how to conduct and manage pre-submission negotiations effectively.
    - Include guidance on improving transparency and communication with registrants.
- Incorporate Website and Policy Navigation into Training
    - Teach staff and stakeholders how to efficiently locate and use guidance documents and policies on the OPP website.

- Update and clarify the pre-submission consultation form to reflect current practices and waiver experience.
- Develop trainings to improve front-end screening consistency.
    - Correct handling of Form 8570-01
    - Routing products to the correct reviewer after assigning numbers.
- Create training on improving the speed of a review for final signature (after the PRM has made a decision.)
- Develop training for OPP staff and applicants on how to escalate or request signatures effectively.
- Develop guidance for EPA and registrants on how to avoid delays and resubmissions.
- Develop training that matches regulations to ensure predictability and consistency.
    - Specifically identify SOPs, guidance documents that EPA staff use for review on a public facing website.
- Provide standardized materials and checklists for packages.
- Develop a training for EPA on how a registration package is created from a data package.
- Develop training on using automated tools for the assignment of MRID numbers.
- Develop training on using automated tools to identify if a product has already been submitted for another variety AND how to pull pertinent information from the completed review for the new review.
- Develop training for registrants on the distinction between technical screen and science review.
- Improve guidance for reading and interpreting forms.
- Develop a training on developing chemical packages which is delivered to EPA employees and registrants.

Topic-Specific Training

- Antimicrobial-Specific Guidance
    - Develop a dedicated Antimicrobial Review Manual to address the unique challenges and regulatory nuances of antimicrobial products.
- Provide targeted training for efficacy reviewers on mathematical concepts such as calculating the Lower Confidence Limit (LCL).
- Create Shared Training for Navigating the Registration Division (RD)
    - Develop standardized training for both EPA staff and external stakeholders on how to navigate RD processes, reducing reliance on internal, proprietary knowledge.
- Develop training modules focused on CSF amendments, label notifications, and other common submission types to reduce variability and improve predictability.
- Focus on supporting understanding of EPA staff on how specialty and professional pesticides are used. This should include, at a minimum, the following contexts:
    - Hospitals
    - Aquatics
    - Lawn care
    - Bed bug treatments
- Develop training through on-site visits.
    - Reintroduce Practical, Field-Based Training
        - Reinstate or modernize on-site training to give EPA staff real-world context for pesticide use, especially in niche areas like animal health.
    - Conduct on-site training visits to give reviewers practical, real-world context for pesticide use.
    - Hands-On, Real-World Training:
        - Develop training modeled after CropLife's "Labels Live" program. Especially valuable for helping reviewers understand practical implications of label requirements, such as what a "100-ft buffer" looks like in the field:
        - In-person, rotational sessions covering different aspects of pesticide use.
        - Conducted by non-registrants to avoid perceived bias.

        - Include field tours and shadowing of professional applicators in real-world settings such as:
            - Hospitals (e.g., sanitation practices)
            - Pest control companies
            - Golf courses and aquatic environments
    - Develop in-person training experiences for EPA to better understand real-world pesticide applications.
        - In a climate of widespread misinformation, first-hand, in-person experiences (e.g., field/site visits) are seen as more trustworthy and impactful than secondhand information.
        - These experiences help reviewers rely less on outdated institutional knowledge and more on current, observable practices.
    - Video-Based Training Modules:
        - Create short, narrated videos (e.g., 1-minute clips) demonstrating real-world pesticide applications. Examples: seed treatments, fumigation, crack and crevice applications, broadcast spraying.
        - Helps reviewers visualize application methods and improve labeling accuracy.
        - Suggested as a cost-effective addition/alternative to in-person training for multiple staff across branches.
    - Collaborative Training with Land Grant Institutions:
        - Engage the land grant university system to facilitate EPA staff shadowing opportunities informed by industry practices.
        - Could serve as a bridge between regulatory understanding and field-based realities.
- Develop comprehensive CDX training modules, including:
    - How to submit an M009 ("we don't think we are regulated") with a dedicated button.
    - How to submit a data waiver (step-by-step guidance).
    - How to complete and interpret the Confidential Statement of Formula (CSF), especially for PIP products.
    - Emphasize example-based training (e.g., "If you are submitting X, here are the buttons to click").
    - Format Suggestions:
        - Step-by-step video tutorials
        - Interactive walkthroughs
        - Live or recorded webinars with Q&A
- Provide refresher training for EPA reviewers on how to assess CSFs for PIPs.
    - Provide this same training to Registrants on how CSFs and PIPs are reviewed.
- Training related to PRN 98-10 for non-safety related actions.
- Better training is needed on the specifics in the label review manual.
- Training is needed to identify what's a drug, what's a pesticide, and who has jurisdiction.
- Training is needed on how a lab study is conducted for manufactured products so EPA reviewers understand what that looks like so do not ask for things that can't be done.
- Training for EPA on how long takes to implement and the bottleneck of label printing – how the supply chain works.
- Training on what a delayed label review means for members. A registrant can lose an entire year for a product if you miss the season of use.

Other

- Develop a Centralized, Up-to-Date Training Program
    - Address regulatory confusion by creating training that clarifies which guidance documents are current and how to interpret them.
    - Include modules that help staff and stakeholders navigate overlapping or outdated regulations.

- Provide training on how to integrate these tools into the registration process.

Actionable Items

- Improve Website and Policy Organization
  - Reorganize the OPP website to make policies and guidance easier to find.
  - Clearer public-facing information helps EPA staff understand what applicants are referencing.
- Centralized source of information
  - Accessibility and Clarity
    - Association have no preferred type of guidance material (e.g. policy, memo, guidance document, PowerPoint, audio, etc.) but emphasize that it is important that the guidance used for internal EPA training should also be clearly identified, easily accessible, and communicated to all applicants.
      - Members emphasized a need to communicate all updates relating to guidance
  - Establish a centralized, searchable database or workflow system for documenting case decisions and their broader applicability. This should include all:
    - Guidance documents
    - Checklists
    - PR Notices
    - Training and review manuals
  - Create a Centralized Guidance Repository
    - Develop and maintain a comprehensive, publicly accessible compilation of all current guidance documents, policies, memos, and related materials. This resource should be regularly updated and clearly indicate the status of each document (e.g., active, under revision, archived).
  - Include a curated list of resources and links to EPA guidance documents in the manual.
  - Establish a Centralized Guidance Portal. Build a centralized, version-controlled public portal for all guidance documents. This portal should include:
    - Automatic update notifications
    - Accessible hyperlinks
    - Clear version histories to ensure users are referencing the most current materials.
  - Create a Centralized, Publicly Accessible Repository:
    - Develop a single, authoritative platform that consolidates:
      - All current and historical guidance documents
      - Applicable exemptions
      - Relevant Pesticide Registration Notices (PRNs)
    - This would reduce confusion, improve transparency, and ensure consistent access to regulatory information.
- Structured Communication and Issue Resolution:
  - Establish a structured system for Product Managers (PMs) to raise and discuss issues, promoting shared learning and consistency.
  - Create a format for regular, organization-wide OPP meetings to align practices and maintain internal consistency.
  - Communicate with registrants know that there is a formal training program so that they understand registrations will be consistent.
- Develop and publish an Antimicrobial Review Manual to address product-specific regulatory nuances.
- Integrate a searchable, comprehensive list of PR Notices into the Label Review Manual or EPA's labeling webpage.
- Require that all policy or procedural changes be accompanied by written guidance or documentation.

- Standardize efficacy review criteria and ensure consistent application across reviewers.
- Develop and publish a standardized "Label Language Table" or guidance document to clarify acceptable terminology.
- Set a recurring schedule (e.g., annually or biannually) to update the Label Review Manual.
- Provide updated technology to support a more efficient work.
- Benchmark Against Other Agencies
- Compare OPP's processes and training systems to other user fee models, such as the FDA's Center for Veterinary Medicine, to identify best practices.
- Increase Transparency and Clarity
- Improve the clarity, accessibility, and consistency of guidance documents and registration timelines.
- CDX
    - Add a dedicated M009 submission button with clear labeling.
- CSF
    - Update the Confidential Statement of Formula (CSF) form or create a PIP-specific version to better reflect protein expression data.
- Improve search functionality on the EPA website to help users find relevant resources more easily.
- Explore ways to streamline EUP-to-dossier transitions to avoid repetitive data submissions.
- Consider biases in product evaluation based on crop biology and breeding feasibility—possibly use MRID numbers to expedite reviews of similar products.
- Foster a learning culture with more proactive outreach and support.
- Emphasize that this is a training challenge, not a technical or administrative one.
- Encourage BETA testing of new tools and processes with real users to identify pain points early. Strategize an approach that will include BETA testing with registrants.
- Clarify the use of cover letters.
- Continue and Expand Collaborative Updates to Key Guidance:
    - Support and accelerate the ongoing updates to foundational documents through the PRIA Coalition, including:
        - PRN 98-1
        - PRN 98-10
        - Herndon Memo
- Finalize Longstanding Draft Guidance Documents:
    - Prioritize finalizing widely used but unofficial documents, such as the 2019 Draft Guidance for Plant Regulator Products and Claims, Including Biostimulants, to enhance regulatory clarity and confidence among registrants.
    - Add Status Tags to Publicly Posted Guidance Documents
- Implement a visible tagging system on all publicly accessible guidance documents to indicate their current status (e.g., "Being Updated," "Current," "Archived"). This will help registrants quickly assess the reliability and relevance of the materials they are using and reduce confusion when internal practices have changed but public documents have not yet been revised.
- Automation
    - The 21 Day Technical Screen could be automated.
    - The completeness check could be automated. Improve the completeness check process to reduce delays.
    - Automate steps where possible to improve efficiency.
    - Provide more data and tracking information to identify opportunities and deficiencies.
    - Update PRN 98-10 and automate related processes.
    - Workflow tracking in SalesForce or other systems should feed into MyPEST
    - Explore the use of automation and AI to support consistency in reviews and reduce manual workload.
    - Automate the Notification Process
    - Implement automation tools to streamline the review and processing of label notifications, reducing delays and manual workload.

Strengths of OPP

Stakeholders were largely happy with EPA staff and their general approach to registrations. Specific strengths identified by stakeholders include:

- Significant drop in complaints of non-response from EPA in recent years.
- Fairly good line of communication with the divisions.
- EPA staff are always invited to association meetings.
- Ultimately, the agency gets actions right, despite delays.
- There are some training materials posted to the EPA website
- EPA staff has conveyed most of their training has been done through mentoring.
- Openness to Stakeholder Collaboration:
    - EPA has shown a strong willingness to engage with industry stakeholders, particularly through the PRIA Coalition, to address concerns and improve regulatory clarity.
    - Stakeholders appreciate having a formal avenue to provide feedback and influence updates to key regulatory documents.
- Proactive Updates to Foundational Guidance: EPA is actively working to update widely used documents. These updates are expected to be completed by 2025 and are seen as critical to improving consistency and predictability in the registration process.
    - PRN 98-1
    - PRN 98-10
    - Herndon Memo
- EPA has Recognition of Internal Challenges and Willingness to Improve: EPA acknowledges that current workloads and review timelines (e.g., four-year reviews) are unsustainable. The agency is open to feedback on distinguishing between essential and non-essential review elements, which could streamline processes.
- Support for Institutional Knowledge and Succession Planning: There is awareness within EPA of the risk posed by the loss of institutional knowledge due to staff retirements. Stakeholders would feel more confident if a clear succession plan were in place to preserve expertise.
- Openness to Industry Support: EPA is increasingly recognizing that it can accept more assistance from industry—such as technical input or training collaboration—without compromising the integrity of its regulatory reviews.
- BPPD is pretty well coordinated. They are doing a good job. The staff is helpful. They are doing a good job trying to keep their timelines.
- There is a good relationship with Bill Smith.
- OPP is doing more now with fewer resources than ever before.
- Efficient Communication via AD Efficacy Team Mailbox
    - The AD Efficacy Team Mailbox is a highly effective communication channel. It is consistently responsive, professional, and efficient in addressing stakeholder inquiries, making it a valuable resource for both registrants and new EPA reviewers.
- Effective Pre-Submission Meeting Process
    - EPA is recognized for its strong performance in organizing and conducting pre-submission meetings. These meetings are a critical touchpoint for clarifying expectations and aligning submission requirements.
    - Registrants typically document the outcomes of these meetings, and while EPA often signs off on the notes, the process can take time.
        - The structure of these meetings supports transparency and collaboration, and there is a shared understanding that:
        - A checklist of discussion points should be provided in advance by EPA.
        - Decisions made during the meeting should be clearly documented in the submission package.

Additional Insights and Follow-Up Opportunities

The stakeholders provided several additional insights and follow-up opportunities:

- There is a need for greater structure and clarity in the pre-submission meetings:
  - EPA should provide a checklist of key decisions and discussion points in advance of pre-submission meetings.
  - Outcomes from the meeting should be clearly documented and included in the final submission package.
  - A standardized form or template should be used to record decisions, with sign-off from all parties to ensure alignment and accountability.
- Consider automation tools to streamline the notification process and reduce delays.
- Enhance training programs to ensure consistency in reviews and adherence to pre-submission meeting guidance.
- Establish a centralized, version-controlled public portal for guidance documents with automatic update notifications.
- Benchmarking Opportunity: There is potential to compare OPP's processes with other user fee systems (e.g., FDA's Center for Veterinary Medicine) to identify best practices.
- Training Development: Recommended the creation of a comprehensive training program to address knowledge gaps and improve staff preparedness.
- Expand BETA Testing
  - Why it matters: Early user testing can uncover usability issues, improve workflows, and ensure tools meet real-world needs.
  - Action: Involve registrants and reviewers in structured BETA testing of new forms, portals, and processes before full rollout.
- Address Sign-Off Delays
  - Why it matters: Delays in internal approvals are a major bottleneck, impacting PRIA deadlines and stakeholder timelines.
  - Action: Increase transparency in the sign-off process, clarify responsibilities, and implement escalation protocols.
- Enhance EPA Website Usability
  - Why it matters: Difficulty finding accurate, up-to-date information hinders compliance and increases frustration.
  - Action: Improve search functionality, update content regularly, and create a centralized resource hub for registrants.
- Institutional Knowledge and Succession Planning:
  - Stakeholders are concerned about the loss of institutional knowledge as experienced staff retire.
  - There is a strong desire for a clear succession plan and strategies to capture and preserve internal expertise, which would increase confidence in the continuity of EPA's regulatory capabilities.
- Shared Ownership of the Review Process:
  - Industry feels more involved in shaping how EPA conducts reviews, which is seen as a positive shift and a new opportunity for collaboration.
  - Ongoing efforts to distinguish between essential and non-essential review elements are appreciated and could lead to more efficient processes.
- Sustained Engagement and Guidance Updates:
  - Continued collaboration through the PRIA Coalition is valued, especially as EPA works to update key guidance documents (e.g., PRN 98-1, 98-10, Herndon Memo) by 2025.
  - Stakeholders appreciate having a formal mechanism to raise concerns and contribute to improvements in the registration process.

Appendix E: Specific Training Materials Requiring Additional Review

Table E.1 Documents requiring additional review based on feedback

The following documents have been identified as high priority for update through the Division POC Feedback Sessions, External Feedback Sessions, and cursory analysis of the content.

Source	Title of document	Unique Identifier
AD	Occupational and Residential Exposure (ORE)	8118
EFED	An Introduction to EFED & OPP: A Broad Overview	5000
EFED	Aquatic Risk Assessment	5013
EFED	CETIS and Statistics Overview	5006
EFED	Drinking Water Assessments- Framework, Conceptual Models and Monitoring Data	5014
EFED	Drinking Water Modeling	5015
EFED	Ecological Incidents and the Incident Data System (IDS)	5009
EFED	Effects (Hazard) Characterization & Relationship to RQs and LOCs	5008
EFED	Effects Data Part 1: Fish and Water Column and Benthic Invertebrates	5004
EFED	Introduction to Endangered Species Act Assessments	5016
EFED	Mitigation & Bulletins Live! Two (BLT)	5017
EFED	New Employee Training: Routes of Exposure and Physical-Chemical Properties of Pesticides	5002
EFED	Terrestrial and Aquatic Plant Ecotoxicity Studies and DERs	5007
EFED	Terrestrial Effects (Hazard) Characterization	5005
EFED	Terrestrial Risk Characterization	5012
EFED	Terrestrial Risk Quantification & Models Part I: TREX & SRAC, Bee-REX and KABAM	5010
EFED	Terrestrial Risk Quantification & Models Part II: TerrPlant and PAT	5011
Knowledge Article	eCSF Data Dictionary	9019
Knowledge Article	Fee Waiver	9022
Knowledge Article	PHTS System Overview	9035
Knowledge Article	PHTS Workflow	9036
Knowledge Article	PRISM Workflow BPPD Team Training	9049
Knowledge Article	PRISM Workflow ISB Team Training	9050
Knowledge Article	RD Guidance - e-Record checklist	9044
OPP	Pesticide Registration Manual: Chapter 2 - Registering a Pesticide Product - PDF	3021

Table E.1 Documents requiring additional review based on feedback (continued

Source	Title of document	Unique Identifier
OPP	Pesticide Registration Manual: Chapter 2 - Registering a Pesticide Product - Website	3020
PRD	Basic CRM Training	1035
PRD	BP Template Responses for CRMs	1148
PRD	ORE Assessment Guide	1190
PRD	Registration Review Checklist	1099
PRD	Registration Review Guidance - DCI Issuance to Decision	1026
PRD	SOP for Creating a GDCI in PRISM (Wizard Platform)	1031
PRD	Standard Operating Procedures: Registration Review Checklist-- First Team Meeting to Final Work Plan	1019
RD	2014 Mississippi Row Crop and Pollinator Tour	6015
RD	90 Day Screen Team Meeting Agenda for PRIA-3 New Uses	6043
RD	90 Day Screening Meeting for PRIA 3 New Users	6042
RD	Acute Toxicity and Similarity Clinic	6048
RD	Bayer Bee Care Tour	6010
RD	California Specialty Crops Tours - July 2015	6008
RD	Crop Tours	6006
RD	ETO Spice Sterilization Facility Site Visit	6012
RD	Example 2 rejection letter	6047
RD	Example 75 day letter	6044
RD	Example pre-decision letter	6045
RD	Example rejection letter	6046
RD	Florida Spring Regulatory Tour - 2015	6007
RD	Intro to OPP Recording	6023
RD	IPM Alliance MI Crop Tour July 28th - 30th, 2015	6009
RD	Label Checklist	6041
RD	Lee County, Florida Mosquito Control District Tour - July 2014	6013
RD	Overview of the File Room and Jackets- 11/3/2015	6029
RD	PRIA III Roles and Requirements	6038
RD	Registration Division	6002
RD	Washington State Comission on Pesticide Registration Crop Tour: OD/DD Briefing, August 2014	6014
RD	Website Links Associated with Into to OPP Presentation	6025
RD	Writing Effective Emails	6018

Table E.2 Documents requiring additional review based on PowerPoint without supporting documents

Although presentations have been identified as a preferred method of conveying training information, it is found that powerpoints that lack the accompanying audio, video, or notes are ineffective. The following presentations are recommended for review and potential update or removal.

Source	Title of document	Unique Identifier
AD	A Deeper Dive into Ecolab's Food Service Solutions	8043
AD	AD Best Practices	16047
AD	AD Confidential Statement of Formula (CSF) Best Practices	8002
AD	AD Confidential Statement of Formula (CSF) Best Practices Guidance	8025
AD	AD RAB New Use Training	8004
AD	AD Registration 101	8059
AD	Antimicrobial Data Requirements: Introduction and Overview	8111
AD	Antimicrobials used in Cooling Water Systems	8114
AD	Antimicrobials Used in Plastics and Textiles	8117
AD	CATSAC 101: AD Science and Regulatory Forum	8034
AD	Changes for Products Applied by Fogging /Misting	8085
AD	Characteristics on Labels that can affect Exposures and Risk	8009
AD	Claims for Emerging Viral Pathogens	8094
AD	Confidential Statement of Formulas Training	8035
AD	Data Compensation	8036
AD	Data Compensation - Risk Management Training	8006
AD	Down-the-Drain (DtD) Assessment	8090
AD	Drinking Water Dietary Risk Assessment	8089
AD	EFED's 2017 Ecological Risk Assessment Training Day 1	8092
AD	EFED's 2017 Ecological Risk Assessment Training Day 2	8093
AD	Efficacy 101	8041
AD	Efficacy 101: Product Performance/Efficacy Data Requirements	8008
AD	Enforcement Case Reviews	16149
AD	Environmental Fate and Transport	8110
AD	EPA's Rules for the Protection of Human Subjects	8047
AD	First Aid Placement on a "Danger" Product and the LCC Response	8045
AD	Hazard Identification and Toxicity Endpont Selection	8046
AD	Hazardous Identification and Application of Uncertainty/Safety Factors	8037
AD	Inert Ingredient Disclosure	8048
AD	Introduction to Down-the-Drain (DtD) Assessment	8109
AD	Introduction to Selective Citations for Risk Managers	8049
AD	Introduction to the Antimicrobials Division	8050
AD	Label Review	8051
AD	Labeling Consistency Committee	8098

Table E.2 Documents requiring additional review based on PowerPoint without supporting documents (Continued)

Source	Title of document	Unique Identifier
AD	LCL Dilution Procedure	8100
AD	M009 Determinations	8007
AD	Mail Team Training	8052
AD	Mammalian Toxicology Data Requirements	8029
AD	Mammalian Toxicology Data Requirements for Antimicrobial Pesticides	8112
AD	NON-PRIA CSF Training 1: Confidential Statement of Formual Basics	8071
AD	Non-PRIA Training 3: CSF Amendments and Inert Screening	16151
AD	Non-PRIAS	8054
AD	Occupational and Residential Exposure (ORE)	8118
AD	Office of Pesticide Programs Overview	8055
AD	Overview of Inert Ingredient Regulatory Program	8102
AD	Overview of the Antimicrobials Division (AD)	8003
AD	Product Chemistry 101	8056
AD	Re-Evaluation 101: or what happens to chemicals after they're registered.	8044
AD	Registration Division Overview	8104
AD	Revised Certification of Pesticide Applicator Regulations (40 CFR Part 171)	8105
AD	Revised Respirator Descriptions Training (Power Point)	8061
AD	Revisions to EPA's Agricultural Worker Protection Standards	8027
AD	Risk Assessment and Science Support Branch 101	8058
AD	Sodium Hypochlorite	8096
AD	Step One: Does the Pesticide Application meet the Standard for Registration?	8088
AD	Treated Article Exemption	8065
AD	Types of Application Packages in Order of Number Received	8066
AD	Welcome to Fairfax Water	8095
AD	What is a Pesticide	8067
AD	When are Conditional Registrations Appropriate?	8086
AD	Wood Preservatives: Fate, Human Health, and Nontarget Organism (Ecological) Data Requirements Perspective	8115
AD	Workflow in SharePoint Tutorial	8068
EFED	An Introduction to EFED & OPP: A Broad Overview	5000
EFED	Aquatic Risk Assessment	5013
EFED	CETIS and Statistics Overview	5006
EFED	Drinking Water Assessments- Framework, Conceptual Models and Monitoring Data	5014
EFED	Drinking Water Modeling	5015

Table E.2 Documents requiring additional review based on PowerPoint without supporting documents (Continued)

Source	Title of document	Unique Identifier
EFED	Ecological Incidents and the Incident Data System (IDS)	5009
EFED	Effects (Hazard) Characterization & Relationship to RQs and LOCs	5008
	Effects Data Part 1: Fish and Water Column and Benthic Invertebrates	5004
	Introduction to Endangered Species Act Assessments	5016
EFED	New Employee Fate Data Introduction - Part 1	5001
EFED	New Employee Training: Routes of Exposure and Physical-Chemical Properties of Pesticides	5002
EFED	Terrestrial and Aquatic Plant Ecotoxicity Studies and DERs	5007
EFED	Terrestrial Effects (Hazard) Characterization	5005
	Terrestrial Risk Characterization	5012
	Terrestrial Risk Quantification & Models Part I: TREX & SRAC, Bee-REX and KABAM	5010
EFED	Terrestrial Risk Quantification & Models Part II: TerrPlant and PAT	5011
EFED	Understanding, Reviewing, and Using Soil & Aquatic Metabolism and Terrestrial Field Dissipation Guideline Studies in Exposure Assessment and Risk Characterization	5003
PRD	Basic CRM Training	1035
PRD	Introduction to OPPs databases 2014	1027
PRD	Re-entry Interval	1091
PRD	Revised Respirator Descriptions Training (Power Point)	1063
RD	"Pesticide Risk Assessment Risk Assessment Overview OR A Risk Assessment is Not a Numbe	6055
RD	Emergency Exemptions "Section 18"	6051
RD	Environmental Fate & Effects Division - Who we are and what we do	6071
RD	Interregional Project Number 4 (IR4)	6077
RD	OPP's Reduced Risk Program	6074
RD	Registration Division Overview	6021
RD	Training+-+Overview+of+Pesticide+Programs.ppt	6024
RD	Traning++11+5+2015++Intro+to+OGC+and+Pesticide+Laws.ppt	6031

Table E.3 Documents requiring additional review based on year

The following documents are recommended for review and potential update or elimination based on date. All documents identified below are most recently updated in 2010 or earlier. The Unique Identifier references the Unique Identifier provided in the PRIA Training Materials Inventory.

Source	Title of document	Unique Identifier
AD	A Short Discussion on Acute Toxicity	8030
AD	AD Technical Handbook	8031
AD	AD Training Tracking	8080
AD	Changes for Products Applied by Fogging /Misting	8085
AD	Confidential Statement of Formulas Training	8035
AD	Data Compensation	8036
AD	Drinking Water Dietary Risk Assessment	8089
AD	Efficacy 101	8041
AD	Hazard Identification and Toxicity Endpoint Selection	8046
AD	Hazardous Identification and Application of Uncertainty/Safety Factors	8037
AD	How to Guide on Locating RASSB Documents	8103
AD	Mammalian Toxicology Data Requirements	8029
AD	Non-Dietary Cancer Risk Policy	8084
AD	Pesticide Label Review Training Part 3	8014
AD	PRIA Flow Chart for Registered Active Ingredient	8077
AD	PRIA Flow Chart for Unregistered Active Ingredient	8078
AD	Revisions to EPA's Agricultural Worker Protection Standards	8027
AD	Risk Assessment and Science Support Branch 101: Terms to Know Cheat Sheet	8057
BEAD	Antimicrobial Testing Methods & Procedures Developed by EPA's Microbiology Laboratory	4000
BEAD	BEAD Guidance for Quotations & Citations	4008
BEAD	New Employee: Laboratory Training Checklist - OPP Microbiology Laboratory	4003
BEAD	New Employee: General Training Checklist - OPP Microbiology Laboratory	4002
BEAD	New Employee: Initial List of SOPs for Familiarization - OPP Microbiology Laboratory	4004
BEAD	OPP Microbiology Laboratory Personnel Training	4001
BEAD	PERSONNEL TRAINING FORM	4005
BEAD	Rate Distribution	4018
BPPD	B660 and B674 Checklist	7011
BPPD	New AI Non-Food Use	7016
BPPD	New AI with Tolerances/1st Food Use	7015
BPPD	Risk Assessment Technical Screen Checklist for Applications Containing Microbial AIs	7017
EFED	An Introduction to EFED & OPP: A Broad Overview	5000
EFED	Aquatic Risk Assessment	5013
EFED	CETIS and Statistics Overview	5006

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
EFED	Drinking Water Assessments- Framework, Conceptual Models and Monitoring Data	5014
EFED	Drinking Water Modeling	5015
EFED	Ecological Incidents and the Incident Data System (IDS)	5009
EFED	Effects (Hazard) Characterization & Relationship to RQs and LOCs	5008
EFED	Effects Data Part 1: Fish and Water Column and Benthic Invertebrates	5004
	Introduction to Endangered Species Act Assessments	5016
	Mitigation & Bulletins Live! Two (BLT)	5017
EFED	New Employee Training: Routes of Exposure and Physical-Chemical Properties of Pesticides	5002
EFED	Terrestrial and Aquatic Plant Ecotoxicity Studies and DERs	5007
EFED	Terrestrial Effects (Hazard) Characterization	5005
EFED	Terrestrial Risk Quantification & Models Part I: TREX & SRAC, Bee-REX and KABAM	5010
	Terrestrial Risk Quantification & Models Part II: TerrPlant and PAT	5011
	Understanding, Reviewing, and Using Soil & Aquatic Metabolism and Terrestrial Field Dissipation Guideline Studies in Exposure Assessment and Risk Characterization	5003
HED	Human Health Risk Assessment: Dietary Exposure Assessment Overview	10000
HED	Human Health Risk Assessment: Hazard Identification & Toxicity Endpoint Selection Overview	10001
HED	Human Health Risk Assessment: Occupational Handler Exposure and Risk	10002
HED	Human Health Risk Assessment: Occupational Post Application Risk Assessment	10003
HED	Human Health Risk Assessment: Pesticide Risk Assessment Overview	10004
HED	Human Health Risk Assessment: Residential Handler Exposure Assessment	10005
HED	Human Health Risk Assessment: Residential Post-Application Assessment	10006
HED	International Harmonization	10076
HED	Putting it All Together - Dietary Exposure/Risk Characterization	10073
HED	REJV	10077
HED	Storage Stability Data Translation	10067
Knowledge Article	All Things Documents! Search, Upload, Link, Unlink!	9004
Knowledge Article	Change Requests: Due Dates & Action Codes	9008
Knowledge Article	Creating a List View	9013

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Knowledge Article	Creating a Request Case/ Action Code Case Manually	9014
Knowledge Article	Favoriting a Record	9021
Knowledge Article	Federal Register Workflow in SharePoint & e-Signing Instructions	9041
Knowledge Article	Files and Documents	9023
Knowledge Article	Files and Documents: Uploading, Edit, Delete	9024
Knowledge Article	Missing Parent Request Case	9030
Knowledge Article	Navigating Case Trees Cases and Tasks	9031
Knowledge Article	Payment Information	9034
Knowledge Article	PRISM ISB Payment Process	9037
Knowledge Article	PRISM Workflow BPPD Team Training	18087
Knowledge Article	PRISM Workflow ISB Team Training	9039
Knowledge Article	Product Managers and SRSs Session 1	9069
Knowledge Article	RD Final E-Record Checklist	9020
Knowledge Article	RD Guidance - Risk manager and PM Workflow Overview	9046
Knowledge Article	RD Guidance - Task Group Assignments to BEAD	9048
Knowledge Article	Resubmissions cannot attach/merge with the correct case	9052
Knowledge Article	Searching for Documentum Documents in PRISM	9053
Knowledge Article	Setting Primary and Secondary Relationships on Cases	9055
Knowledge Article	System Calculated Pria Start Dates	9056
Knowledge Article	Task Groups and Tasks	9057
Knowledge Article	Terminology Crosswalk and Glossary	9058

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Knowledge Article	The Matrix Tab	9059
Knowledge Article	Time Warp Timeline	9060
Knowledge Article	unknown	9016
Knowledge Article	Using Macros	9063
Knowledge Article	Video demonstration for Creating a task	9017
Knowledge Article	What is Chatter?	9064
OPP	Basic Information about Pesticide Ingredients	3002
OPP	Bulletins Live! Two (BLT): Tutorial	
OPP	How to Register a Pesticide – A Guide for Applicants New to the Process - PDF	3003
OPP	Module 1: Pesticide Label Review Training - Label Basics Module	3032
OPP	Module 2: Pesticide Label Review Training - Parts of the Label	3033
OPP	Module 3: Pesticide Label Review Training - Special Issues	3034
OPP	Module 4: Pesticide Label Review Training - Applying the Principles of Pesticide Label Review	3035
OPP	Pesticide Label Review Training	3031
OPP	Pesticide Label Review Training - Emerging issues and Course Completion	3036
OPP	Pesticide Labeling Questions & Answers	3037
OPP	Pesticide Registration Manual Introduction - PDF	3000
OPP	Pesticide Registration Manual: Chapter 1 - Overview of Requirements for Pesticide Registration and Registrant Obligations - Website	3018
OPP	Pesticide Registration Manual: Chapter 2 - Registering a Pesticide Product - PDF	3021
OPP	Pesticide Registration Notice (PR) 98-10: Notifications, Non-Notifications and Minor Formulation Amendments	3038
OPP-Pesticide Manual	About Pesticide Tolerances	3017
OPP-Pesticide Manual	Application Submission and Screening	3029
OPP-Pesticide Manual	Data Requirements for Pesticide Registration	6017
OPP-Pesticide Manual	Electronic Submissions of Pesticide Applications	3023
OPP-Pesticide Manual	Formulator's Exemption Statement	3030
OPP-Pesticide Manual	List of Pests of Significant Public Health Importance	3014

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
OPP-Pesticide Manual	Organization Chart/Current Headquarters Leadership for EPA Pesticide Programs	
OPP-Pesticide Manual	Pesticide Data Submitters List	3012
OPP-Pesticide Manual	PRIA Overview and History	3022
OPP-Pesticide Manual	PRN 2011-3: Standard Format for Data Submitted Under FIFRA and Certain Provisions of FFDCA	3028
OPP-Pesticide Manual	Requirements for Registration of Antimicrobial Pesticides: Part 158W | US EPA	3011
OPP-Pesticide Manual	Series 810 - Product Performance Test Guidelines	3015
OPP-Pesticide Manual	Series 830 - Product Properties Test Guidelines	3006
OPP-Pesticide Manual	Series 850 - Ecological Effects Test Guidelines	3007
OPP-Pesticide Manual	Series 860 - Residue Chemistry Test Guidelines	3008
OPP-Pesticide Manual	Series 870 - Health Effects Test Guidelines	3005
OPP-Pesticide Manual	Series 880 - Biochemicals Test Guidelines	3010
OPP-Pesticide Manual	Series 885 - Microbial Pesticide Test Guidelines	3009
OPP-Pesticide Manual	Test Orders Response and Status Tracking	3027
PRD		1200
PRD	6(f) Cancellation Order Guidance	1181
PRD	Agency Stakeholder Engagement Requirements in the Code of Federal Regulations	1193
PRD	Center for Biological Diversity folder of old comments	1196
PRD	Data Compensation/DCI/ Task Forces	1006
PRD	EDSP Final First List of Chemicals for Tier 1 Screening -FRN	1008
PRD	Existing Stocks Policy	1198
PRD	Federal Register Documents: Drafting Support and Templates	1206
PRD	Federal Register/Vol. 74, No. 71	1009
PRD	First Team Meeting to FWP - updated	1203
PRD	Folder containing guidance on a number of professional development topics	1205
PRD	Folder of Artic Slope contracts	1204
PRD	Folder with label reviews from Product Reregistration (RED)	1185
PRD	Guidance for Acquiring Agricultural Data and Information	1004

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
PRD	Guidance for Registration Review Data Requests for Oxon Degradates of Organophosphate Insecticides (OP)	1007
PRD	How to Create a PDF File Containing a Signature Page	1005
PRD	Individual Document Scanning Process	1003
PRD	Labeling guidance - Exceptions during an REI and Prohibitions after an REI Expires	1051
PRD	Non-Dietary Cancer Risk Policy	1195
PRD	Plant Tech Team Bulletins Live! Two-20230628 Meeting recording	1208
PRD	PRD 101 for New Employees	1068
PRD	PRD mitigation guidance document.	1211
PRD	Procedure for Uploading Documents to the Docket	1197
PRD	Public Participation Process for Registration Actions	1192
PRD	Quick Guide to WPS Scope Determinations	1199
PRD	Ricardo Jones and Christiam Bongard's Access Database Crash course	2403
PRD	SF Task Group Best Practices from PRD to EFED, HED, BEAD	1210
PRD	Spray Drift Guidance for CRMs (Draft)	1166
PRD	Standard Operating Procedure for Dealing with the Press	1188
PRD	Standard Operating Procedures for 6(a)(2) Submissions and Processes	1194
RD	"Pesticide Risk Assessment Risk Assessment Overview OR A Risk Assessment is Not a Number	6055
RD	Contacts in the Office of Pesticide Programs, Registration Division	6005
RD	Environmental Fate & Effects Division - Risk Assessment 101	6070
RD	Environmental Fate & Effects Division - Who we are and what we do	6071
RD	Excel Calculation example	6081
RD	Interregional Project Number 4 (IR4)	6077
RD	IR-4 Training Presentation Links	6078
RD	Label Rate Training	6079
RD	Label Rate Training Word Doc	6080
RD	Models for Pesticide Risk Assessment	6068
RD	Pesticide Chemical Search	6027
RD	Pesticide Registration Division Chemical List with Branch Assignments	6003
RD	Product Chemistry	6069
RD	RD-OPP New Employee Training Links	6017
RD	RD-Workflow Point of Contacts	6016
RD	Registration Division	6002
RD	Registration Division Conventional Pesticides Branch and Product Manager (PM) Assignments	6004
RD	Reviewer Bi-weekly meetings	6000
RD	SalesForce Training Videos	6082
RD	Science Policy Handbook - Risk Characterization	6028
RD	Series 835 - Fate, Transport and Transformation Test Guidelines	6067
RD	Syngenta Formulation Development 101 Training- 08/09/2018	6019
RD	Training Slides	6026

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
RD	Training+-+Overview+of+Pesticide+Programs.ppt	6024
RD	Training+-+PRIA+3.ppt	6039
RD	Traning++11+5+2015++Intro+to+OGC+and+Pesticide+Laws.ppt	6031
RD	Web Links Associated with HED Risk Assessment Presentation:	6066
RD	Web Links Associated with Section 18 Special Local Need Presentation	6052
RD	Web links from EFED training	6072
RD	Website Links Associated with Into to OPP Presentation	6025
RD	Website Links Associated with the Label is the Law Presentation.docx	6034
RD	Writing Effective Emails	6018
Repository	Creating a PDF Version of Study Reports - General Specifications	2081
Repository	Data Compensation Documents	2082
Repository	Data for Refining Anticipated Residue Estimates Used in Acute Dietary Probabilistic Risk Assessments	2070
Repository	Determining If Insect Repellent Skin Patch Products Must Be Registered Under FIFRA	2002
Repository	Disclosure of Reviews of Pesticide Test Data	2085
Repository	Draft Interim Guidance for Non-Residual Sanitizers on Hard, Inanimate Food Contact Surfaces Using Pre-Saturated Towelettes	2039
Repository	Draft PRN 2006-A: Use of Antimicrobial Pesticide Products in Heating, Ventilation, Air Conditioning and Refrigeration Systems (HVAC&R)	2086
Repository	E-Submission Chronic Toxicology Study Supplemental Files	2030
Repository	E-Submission Environmental Study Supplemental Files	2307
Repository	E-submission for avian reproduction studies	2302
Repository	E-submission for surface water and groundwater field studies and monitoring data	2304
Repository	E-Submission for Terrestrial and Aquatic Plant Studies	2305
Repository	Full Specifications for Text PDF Label Submissions	2332
Repository	Guidance for Reregistration of Pesticide Products Containing Chlorinated Isocyanurates as the Active Ingredient	2042
Repository	Guidance for Reregistration of Pesticides containing Sodium and Calcium Hypochlorite Salts as the Active Ingredient	2043
Repository	Guidance For The Reregistration Of Wood Preservative Pesticide Products Containing Chromated And Non-Chromated Arsenicals as the Active Ingredient, Case Number 0647	2044
Repository	Guidance for Thyroid Assays in Pregnant Animals, Fetuses and Postnatal Animals, and Adult Animals	2093
Repository	Guidance on Warranty Statements	2046
Repository	How to Search for Tolerances for Pesticide Ingredients in the Code of Federal Regulations	2335
Repository	Meetings with Manufacturers of Pet Spot-on Products	2344
Repository	Method for testing ready-to-use bait stations with adults for facility of opening, reclosing, and securing	2258
Repository	Method for testing ready-to-use bait stations with young children	2259

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Repository	Method for testing ready-to-use consumer bait stations with dogs	2260
Repository	Pest Control Devices and Device Producers: 1976 Federal Register Notice	2104
Repository	Pesticide Registration (PR) Notice 87-1 MOU	2106
Repository	Pesticide Registration Manual: Chapter 11 - Tolerance Petitions	2237
Repository	Pesticide Registration Manual: Chapter 21 - Directions for Submitting Applications and Contacting EPA	2233
Repository	Pesticide Registration Manual: Chapter 5 - Registration Fees	2229
Repository	Pesticide Registration Manual: How to Report Changes to Company Name or Address	2230
Repository	Policy on Existing Stocks of Pesticide Products	2072
Repository	PR (Pesticide Registration) Notice 96-8; Toxicologically Significant Levels of Pesticide Active Ingredients	2240
Repository	PR Notice 2000-1; Applicability of the Treated Articles Exemption to Antimicrobial Pesticides	2241
Repository	PR Notice 2000-5; Guidance for Mandatory and Advisory Labeling Statements	2242
Repository	PR Notice 2001-3; Insect Repellents: Labeling Restrictions for Use on Infants and Children and Restrictions on Food Fragrances and Colors	2243
Repository	PR Notice 2001-5; Guidance for Pesticide Registrants on Pesticide Resistance Management Labeling	2244
Repository	PR Notice 2002-2; Guidance for Submitting Requests for Threshold of Regulation Decisions to OPP	2245
Repository	PR Notice 2003-1; Labeling of Pesticide Products under the National Organic Program	2246
Repository	PR Notice 2007-2: Guidance on Small-Scale Field Testing and Low-level Presence in Food of Plant-Incorporated Protectants (PIPs	2247
Repository	PR Notice 83-3 Appendix B	2109
Repository	PR Notice 94-4 MOU on Regulation of Liquid Chemical Germicides Intended for Use on Medical Devices	2110
Repository	PR Notice 97-5; Use of Common Names for Active Ingredients on Pesticide Labeling	2248
Repository	PR Notice 97-6; Use of Term "Inert" in the Label Ingredients Statement	2249
Repository	PR Notice 98-1; Self-Certification of Product Chemistry Data	2250
Repository	PR Notice 99-1; Import of Unregistered Pesticides Intended for Export	2251
Repository	PRN 1982-2 Change in Procedures for Approval of Applications	2112
Repository	PRN 2000-10: Changes to "Effective Date and Procedures", "Applicability of the Treated Articles Exemption to Antimicrobial Pesticides"	2113
Repository	PRN 2000-2: The FIFRA Endangered Species Task Force	2114
Repository	PRN 2000-6; Minimum Risk Pesticides Exempted under FIFRA Section 25(b) Clarification of Issues	2115
Repository	PRN 2000-7: Non-Dietary Exposure Task Force	2116

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Repository	PRN 2000-8: Reportability of Attorneys' Opinions and Conclusions Under 40 CFR Part 159 and FIFRA Section 6(a)(2)	2117
Repository	PRN 2001-1: First Aid Statements on Pesticide Product Labels	2118
Repository	PRN 2001-2: Acute Toxicity Data Requirements For Granular Pesticide Products, Including Those With Granular Fertilizers in the Product.	2119
Repository	PRN 2001-4: Elimination of Phenol Resistance Testing for Antimicrobial Disinfectant and Sanitizer Pesticides	2120
Repository	PRN 2002-1: Lists of Pests of Significant Public Health Importance	2121
Repository	PRN 2003-3: Procedural Guidance for EPA's Office of Pesticide Programs Procedures Concerning the Development, Modification, and Implementation of Policy Guidance Documents	2122
Repository	PRN 2005-1: Labeling Statements on Products Used for Adult Mosquito Control	2123
Repository	PRN 2007-1: Disposal Instructions on Non-Antimicrobial Residential or Household Use Pesticide Product Labels	2124
Repository	PRN 2007-3: The Agricultural Handlers Exposure Task Force, L.L.C	2125
Repository	PRN 2007-4: Labeling Revisions Required by the Final Rule "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment	2126
Repository	PRN 2008-1: Notice to Manufacturers, Producers, Formulators, and Registrants of Pesticide Products	2127
Repository	PRN 2008-2: Antimicrobial Pesticide Products With Anthrax-Related Claims	2128
Repository	PRN 2009-1: Establishment of Antimicrobial Exposure Assessment Task Force II	2129
Repository	PRN 66 Federal Registration of Economic Poisons	2138
Repository	PRN 67-5 Economic Poisons Containing Sodium Hypochlorite	2139
Repository	PRN 70-16: Requirements for Additional Labeling on Products Containing Sodium Hypochlorite	2140
Repository	PRN 73-4: Residual Insecticides in Food Handling Establishments	2141
Repository	PRN 75-5: Unacceptable Use of the Word "Chlorine" in the Name and Labeling of Pesticides	2142
Repository	PRN 80-2: Label Improvement Program: Deletion of Salt Water Emesis Statements	2143
Repository	PRN 81-4: Label Improvement Program - Label Revisions to Accommodate New AOAC Methods of Chemical Analysis	2144
Repository	PRN 82-1: Revised Policy on Label Claims for Tank Mixing	2145
Repository	PRN 83-3: Label Improvement Program - Storage and Disposal Label Statements	2146
Repository	PRN 84-1: Clarification of Label Improvement Program for Farmworker Safety and Pesticide Storage and Disposal Instructions	2147
Repository	PRN 84-5: Label Improvement Program for Fumigants	2148

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Repository	PRN 85-6: Clarification of Label Improvement Program for Fumigants. Revision of PR Notice 84-5	2149
Repository	PRN 87-1: Label Improvement Program for Pesticides Applied through Irrigation Systems (Chemigation)	2150
Repository	PRN 87-6: Inert Ingredients in Pesticide Products; Policy Statement	2151
Repository	PRN 88-2: Clustering of Quaternary Ammonium Compounds	2152
Repository	PRN 88-6: Change in Registration Procedures; Agency Approval not Required for Certain Amendments	2153
Repository	PRN 90-1: Inert Ingredients in Pesticide Products; Revised Policy Statement	2154
Repository	PRN 90-3: Announcing the Formation of an Industry-Wide Spray Drift Task Force	2155
Repository	PRN 91-1: Procedures for Voluntarily Requesting Deletion of Approved Uses from Registered Labels	2156
Repository	PRN 91-2: Accuracy of Stated Percentages for Ingredients Statement	2157
Repository	PRN 92-1: Requirement to submit and identify adverse effects information	2158
Repository	PRN 92-2: Permissible label claims regarding ozone depleting substances	2159
Repository	PRN 92-4: Material Safety Data Sheets as Pesticide Labeling	2160
Repository	PRN 93-1: Statement of Restricted Use Classification	2163
Repository	PRN 93-10: Effluent Discharge Labeling Statements	2161
Repository	PRN 93-11: Supplemental Guidance for PR Notice 93-7 - Labeling Revisions Required by the WPS	2162
Repository	PRN 93-2: Waiver of Crop Field Trial Data for Aerial Applications	2164
Repository	PRN 93-3: Labeling Statement Prohibiting Application to Water	2165
Repository	PRN 93-4: Ban on Aerosol Products Containing CFCs and HCFCs under the Clean Air Act	2166
Repository	PRN 93-5: Labeling Requirements of the Clean Air Act	2167
Repository	PRN 93-6: False or Misleading Statements Related to Efficacy; Revision of PR Notice 91-7	2168
Repository	PRN 93-7: Labeling Revisions Required by the Worker Protection Standard (WPS)	2169
Repository	PRN 93-8: Labeling Statement Prohibiting Application to Water; Amendment to PR Notice 93-3	2170
Repository	PRN 93-9: Voluntary Reduced-Risk Pesticides Initiative	2171
Repository	PRN 94-1: Withdrawal of PR Notice 91-8	2172
Repository	PRN 94-2: Recycling Empty Aerosol Pesticide Containers	2173
Repository	PRN 94-5: Requests for Re-considerations of Carcinogenicity Peer Review Decisions Based on Changes in Pathology Diagnoses	2174
Repository	PRN 94-6: Pesticide Products Registered for Use on Humans to Control Lice (Pediculicides)	2175
Repository	PRN 94-7: Label Improvement Program for the Revision of Use Directions for Commensal Rodenticides and Statement of the Agency's Policies on the Use of Rodenticide Bait Stations	2176

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Repository	PRN 94-8: Water Soluble Packaging (WSP)	2177
Repository	PRN 94-9: Announcing the Formation of Two Industry-Wide Task Forces: Agricultural Reentry Task Force and Outdoor Residential Exposure Task Force	2178
Repository	PRN 95-1: Effluent Discharge Labeling Statements	2179
Repository	PRN 95-3: Reduction of Worker protection Standard (WPS) Interim Restricted Entry Intervals (REIS) for Certain Low Risk Pesticides	2180
Repository	PRN 95-5: Labeling Revisions Required By The Worker Protection Standard (WPS) For Sale Or Distribution Of Certain Agricultural Pesticides After October 23,1995	2181
Repository	PRN 96-1: Tolerance Enforcement Methods - Independent Laboratory Validation by Petitioner	2182
Repository	PRN 96-2: Changes to Child-Resistant Packaging (CRP) Testing Requirements	2183
Repository	PRN 96-3: Pesticide Products Used to Disinsect Aircraft	2184
Repository	PRN 96-4: Label Statements Involving Product Efficacy and Potential for Harm to Property	2185
Repository	PRN 96-7: Termiticide Labeling	2186
Repository	PRN 97-1: Agency Actions under the Requirements of the Food Quality Protection Act	2187
Repository	PRN 97-3: Guidelines for Expedited Review of Conventional Pesticides under the Reduced-Risk Initiative and for Biological Pesticides	2188
Repository	PRN 97-4: Consumer Access Numbers on Pesticide Labels	2189
Repository	PRN 97-5 Appendix A	2111
Repository	PRN 97-5 Appendix B	2190
Repository	PRN 97-7: Existing Stocks for Labeling Changes in PR Notices	2191
Repository	PRN 97-9: Electronic Submission Of Child-Resistant Packaging Test Data For All Pesticides	2192
Repository	PRN 98-10: Notifications, Non-Notifications and Minor Formulation Amendments	2193
Repository	PRN 98-2: Liquid Chemical Sterilant Products	2194
Repository	PRN 98-3: Guidance on Final FIFRA 6(a)(2) Regulations for Pesticide Product Registrants	2195
Repository	PRN 98-4: Additional Guidance on Final FIFRA Section 6(a)(2) Regulations for Pesticide Product Registrants w/Attachment	2196
Repository	PRN 98-5: New Forms for the Certification with Respect to Citation of Data	2197
Repository	PRN 98-6: Flammability Labeling Requirements for Total Release Fogger Pesticides	2198
Repository	PRN 98-8: Waiver of Fees Associated with Tolerance Objections	2199
Repository	PRN 98-9: Modification of Respirator Statements for Pesticide Product Labels	2200

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Repository	PRN Notice 94-4: Interim Measures for the Registration of Antimicrobial Products/Liquid Chemical Germicides with Medical Device Use Claims Under the Memorandum of Understanding Between EPA and FDA	2201
Repository	PRN Notice 96-6: Pet Pesticide Product Label Statements	2202
Repository	Product Registration Batching Guidance for Quaternary Ammonium Compounds (Cases 03503 and 3003)--Acute Mammalian Toxicity Data Requirements	2025
Repository	Reregistration Eligibility Document Sodium and Calcium Hypochlorite Salts	2050
Repository	Standard Format for Electronic Submission of Supplemental Data Files in Support of Chronic/Sub-Chronic Studies.	2031
Repository	Standard Format for Electronic Submission of Supplemental Data Files in Support of Developmental Neurotoxicity (DNT) Studies.	2032
Repository	Standard Format for Electronic Submission of Supplemental Data Files in Support of Multi-Generation Reproduction Studies.	2033
Repository	Standard Format for Electronic Submission of Supplemental Data Files in Support of Prenatal Developmental Toxicity Data.	2034
Repository	Standard house mouse acute dry bait laboratory test method	2261
Repository	Standard house mouse acute liquid bait laboratory test method	2262
Repository	Standard house mouse acute technical and concentrated dry bait laboratory test method	2263
Repository	Standard house mouse acute tracking powder efficacy laboratory test method	2326
Repository	Standard house mouse anticoagulant dry bait laboratory test method	2264
Repository	Standard house mouse anticoagulant liquid bait laboratory test method	2265
Repository	Standard house mouse anticoagulant placepack penetration laboratory test method	2266
Repository	Standard house mouse anticoagulant technical and concentrated dry bait laboratory test method	2267
Repository	Standard house mouse anticoagulant tracking powder efficacy laboratory test method	2327
Repository	Standard house mouse anticoagulant wax block and wax pellet laboratory test method	2338
Repository	Standard mouse acute placepack dry bait laboratory test method	2268
Repository	Standard norway rat and roof rat acute placepack dry bait laboratory test method	2269
Repository	Standard norway rat and roof rat anticoagulant liquid bait laboratory test method	2270
Repository	Standard norway rat and roof rat anticoagulant placepack dry bait laboratory test method	2271
Repository	Standard norway rat anticoagulant wax block and wax pellet laboratory test method	2339
Repository	Standard norway rat/roof rat acute dry bait laboratory test method	2272

Table E.3 Documents requiring additional review based on year (continued)

Source	Title of document	Unique Identifier
Repository	Standard norway rat/roof rat acute liquid bait laboratory test method	2273
Repository	Standard norway rat/roof rat acute technical and concentrated dry bait laboratory test method	2274
Repository	Standard norway rat/roof rat acute tracking powder efficacy laboratory test method	2328
Repository	Standard norway rat/roof rat anticoagulant dry bait laboratory test method	2275
Repository	Standard norway rat/roof rat anticoagulant technical and concentrated dry bait laboratory test method	2276
Repository	Standard norway rat/roof rat anticoagulant tracking powder efficacy laboratory test method	2329
Repository	Standard peromyscus species acute dry bait laboratory test method	2277
Repository	Standard peromyscus species acute technical and concentrated dry bait laboratory test method	2278
Repository	Standard peromyscus species anticoagulant dry bait laboratory test method	2279
Repository	Standard peromyscus species anticoagulant technical and concentrated dry bait laboratory test method	2280
Repository	Subdivision G	2052
Repository	Suggested Format for Acute Toxicity Studies	2310
Repository	Tier-Based Testing for the Effects of Proteinaceous Insecticidal Plant-Incorporated Protectants	2286
Repository	Voluntary Incident Reporting Forms and Instructions	2352