

# Working Effectively with the EPA's Office of Pesticide Programs

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# Welcome

## Megan Provost, President



# Today's Presentors

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- + Working Effectively with OPP
- + Building Effective Relationships
- + Difficult Conversations
- + Common Perceptions

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# Understanding OPP Structure

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- The Office of Pesticide Programs organizational structure is designed to manage pesticide regulation and policy through specialized divisions.
- Regulatory submissions have defined contacts.
- Visit OPP website for latest information on Registration Division, by topic and leads.

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# Then v. Now

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- **Before PRIA enactment**
  - A lot of submissions in any given fiscal year simply did not get worked on depending on available resources (appropriations); annual targets for various actions were established.
- **After PRIA enactment**
  - Every action received must be processed and worked on upon receipt and completed by a due date; available resources (appropriations plus PRIA fees).

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# Appreciate Reality

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- **An appreciation of the reality of the situation is critical to establishing effective working relationships.**
- **Realize, understand, appreciate the process limitations, workload, and constraints.**
  - Reality: PRIA 5 included many actions beyond product registration actions (actions with PRIA codes).
  - Some examples include: ESA, Antimicrobial Resistance, Bilingual Labeling, and VERV.

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# Resource Limitations

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- **Appropriations**
  - Less than needed to deliver on the workload by PRIA deadlines.
  - Without certainty on available resources available from year to year it is difficult, if not impossible to staff adequately and plan work.
- **PRIA fees**
  - PRIA funding was meant to close the gap between appropriations and actual resources needed to be able to work on all actions when they are received.
  - PRIA fees are not 100% cost recovery.

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# Tools to Do the Job

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- **Tracking and information systems have been inadequate for years**
  - Fully operational Salesforce provides a critical tool for assigning, tracking, and monitoring pending work, due dates, measuring productivity and completions.
  - “Pizza Tracker” will become a reality and will improve ability for industry to track actions as they progress through the review process.

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# Be Clear & Appropriate

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- **The industry has a lot of actions pending that the business is depending on; OPP has a lot on its plate, too.**
- **Prioritize and communicate on the most important actions/issues.**
  - If everything is a priority, then nothing is a priority.
- **Talk to the right person.**
  - Discuss with appropriate staff at the appropriate level; elevate when necessary following the chain of command.
- **Communicate with one voice from your company.**
  - Different messengers, different messages, different levels
- **Work out a method of communication including frequency.**
- **Understand what OPP staff have control over.**

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# Follow the “RIGHT” Principles

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- Talk to the RIGHT person.
- About the RIGHT topics.
- At the RIGHT time.
- In the RIGHT way.

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# Do Your Research

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- More metrics on OPP's production are available and shared during regularly scheduled PRIA briefings than ever before.
- Analyze your companies' metrics to assure complete, quality packages are being submitted and success of your application on the first review; types of deficiencies identified; ways to make the submissions easier to review.
- Generalizations, exaggerations, undocumented information are not helpful, take on a life of their own, and do some damage.
- Reality: have realistic expectations - cannot continue to expect something that is impossible to deliver.

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# Other Best Practices

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- **Use trade associations effectively to identify generic problems or suggest a process improvement.**
  - OPP has applied and will continue to apply LEAN\* to improve processes.
  - Example: multiple CSF submission requirements.
- **When highlighting experiences with OPP in public forum, be sure to include all pertinent information with a goal towards leading to improvement and constructive change.**

*\*LEAN process improvement is a method for eliminating waste and improving efficiency in a company's processes and systems.*

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# Other Best Practices

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- **Recognize OPP process improvements and completions.**
  - Production has increased: compare production and resources with that from previous fiscal years.
  - Non-PRIA backlog significantly reduced this fiscal year for first time ever.
  - Fast track amendments: highlight changes on label to focus the review.
  - Other idease in discussion: rewrite of PR Notices 98-1 and 98-10.
  - Focus on what regulatory divisions can control.

# Building Effective Relationships with Regulators

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# Why Build Trust?

- Trust is how we shape the way people are connected; the relationships we build.
- Organizations with high levels of trust experience:
  - Improved productivity and performance.
  - Ethical decision making.
  - Stronger teamwork and increased collaboration.

**SOURCES:**

Lewis, Abbey “Good Leadership? It All Starts With Trust.,” Harvard Business Review, 2022. <https://www.harvardbusiness.org/good-leadership-it-all-starts-with-trust/>  
Zak, Paul, “The Neuroscience of Trust,” Harvard Business Review, 2017. <https://hbr.org/2017/01/the-neuroscience-of-trust>.

# Establishing Trust

$$\text{Trustworthiness} = \frac{\text{Credibility} + \text{Reliability} + \text{Vulnerability}}{\text{Self-Interest}}$$


**SOURCES:**

Maister, David H., Charles H. Green, and Robert M. Galford. *The trusted advisor*. New York, NY: Free Press, an imprint of Simon & Schuster, Inc, 2021.

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# Start Off on the Right Foot

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**Request an introductory or kickoff call.**

- Establish expectations.
- Define communication preferences.
- Clarify timelines.
- Thank them for their time.

# Be Prepared

**Set a goal and define your key points in advance.**

- Do your research.
- Have any necessary materials ready.
- Get familiar with format and who your regulator is.
  - Have others in your company worked with them before?
  - What is their background and/or area of expertise?
- Anticipate questions and plan responses.

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# Advocate for Your Organization

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**Be clear. Be confident.**

- Be clear and concise in your asks.
- Avoid acronyms or company jargon.
- Bridge to your key messages; stay on agenda.
- Ask direct questions. Seek clarity, if confused.
- Keep a “paper” trail.

**Remember, 80% of your impact is based on how you speak, not what you say. Stay cool, calm, and confident.**

# Navigating Difficult Conversations

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## ➤ **Prepare.**

- Plan your talking points, latest status, and check dates.
- Have specific dates and examples.
- Consider the regulator's position.
- Identify potential solutions.

## ➤ **Discuss.**

- Ensure a comfortable environment.
- Focus on facts, not feelings.
- Consider perspectives.
- Listen.
- Be confident, but kind.
- Keep the conversation solution-oriented.

## ➤ **Reflect.**

- Follow up, outlining conclusions, decisions, and next steps.
- Reflect on what went well, what could have been better.
- Complete your action items ASAP.
- Say thank you.

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# Advocacy Pitfalls

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- Trying to convey you know it all
- Showing extreme frustration
- Negative repetition
- Losing the connection between points
- Speculation or exaggeration
- Overpromising or oversharing

# Common Perceptions

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# Common Perceptions

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## **“I am paying a fee for this submission.”**

- PRIA fees are not 100% cost recovery. Appropriations and PRIA fees are sources of funding for OPP. PRIA fees were meant to bridge the gap between resources needed and appropriations.

## **“To increase productivity, everyone should be told to return to work in the office.”**

- Production data from pre, during, and post-COVID shows that the highest levels of productivity were during and post-COVID.

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# Common Perceptions

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## **“Staff are not held accountable”**

- Salesforce provides managers data on staff productivity.

## **“OPP should operate like a business.”**

- OPP is not a business. It has no control over the workload nor resources available.

## **“Registrants are OPP’s customer.”**

- Industry is a customer of the *process*.

# Q&A

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