

PRIA 5 Score Card: Deliverables

Objective	Due Date	Comments	Status
Seek stakeholder input on ways to make bilingual labels more accessible to farm workers	6/27/2023	EPA held a national webinar and sought comment from the NEJAC and PPDC.	✓
Develop an aggregated website on pesticide regulation and the risk assessment process	6/27/2023	Requested by NGOs	✓
Issue final ESA guidance addressing new active ingredients or any registration review decision for outdoor uses	9/29/2023	Issued on 9/14/23	✓
Issue final ESA guidance addressing new outdoor uses of a registered pesticide	12/29/2023	Issued on 12/14/23	✓
Establish a Vector Expedited Review Voucher Program	12/29/2023	PR Notice issued, monitoring implementation	✓
Establish a competitive grant program to develop training curricula with a land-grant, HBCU or other minority serving institution	12/29/2023 <i>to the maximum extent practicable</i>	EPA expanded an existing EPA contract with a third party to provide training to OPP; EPA is also developing a competitive grant for training that will be directed to institutions of higher education	
Issue a competitive contract to a private, independent consulting firm to conduct an audit of EPA processes	12/29/2023	EPA has identified a contractor and is finalizing the details of this independent, third-party assessment with the contractor	
Establish an IT system that includes all registering divisions and provides real-time tracking system for all regulatory submissions (all divisions working through Sales Force	12/29/2023	Sales Force migration for RD was completed in September 2023. RD data regarding past completed actions was will be fully migrated into the system in March 2024	✓
Establish an IT system that provides each applicant with real-time, confidential, online access of the regulatory submissions	12/29/2023	Beginning December 2024, registrants may designate a company administrator to access the customer experience and submission tracking project; the first version of the submission-tracking dashboard will be launched in January 2025	

 **COMPLETED**

 **IN PROCESS**

 **LATE**

Objective	Due Date	Comments	Status
Updates the electronic submission portal to 1) Limit reviews to current label changes; 2) To automate minor, low risk regulatory actions; and 3) To allow self-certification of certain regulatory actions.	12/29/2023	EPA is working with its contractor on additional portal improvements that will enhance automation; EPA and trade associations have been meeting to discuss changes to PRN 98-10 (notification, non-notification, and minor formulation label changes); EPA is expected to release an updated draft version of PRN 98-10 for public comment in 2025; EPA also plans to release a revised confidential statement of formula (CSF) formatting scheme that is intended to streamline the process soon	
Develop a plan for tracking the adoption of the bilingual labeling	12/29/2024	EPA is expected to issue a draft PR notice for comment before the end of the year that will outline a process for tracking adoption of bilingual labeling; EPA will likely request information from registrants when they pay their annual maintenance fees	
PRIA Annual report	No later than 120 days after the last day of each of fiscal years 2023 through 2027	Released 5/17/24, was due on 1/28/24; EPA reports that the 2024 PRIA Annual Report will be released on-time in late January	✓
VERV annual report	No later than September 30, 2025, and not later than September 30 of each year thereafter		N/A
Developmental public health performance standards for antimicrobial pesticide devices	No specified due date, annual set-aside	AD and ORD workplan developed. EPA will conduct controlled bioaerosol chamber tests. EPA estimates that draft efficacy test methods will be released for public comment in FY 26.	
Issue Certificates of Establishments	12/27/2023	Initially issued as text email, but corrected as of 2/9/24 to be a PDF with an official signature.	✓

PRIA 5 Score Card: Process Improvement Implementation

Objective	Due Date	Comments	Status
Reduced Risk PRIA Clock Start Date	No date specified, but inferred as effective 12/29/22	EPA is following this requirement. Since PRIA 5 no new reduced risk applications have resulted in a category change	✓
Develop a process for sharing DERs	No date specified, but inferred as effective 12/29/22	EPA's DER distribution system via GoAnywhere software is up and running for all registration actions issued after January 1, 2024. For DERs issued prior to January 1, registrants should submit a FOIA request.	✓
Prevention of Double Payment of Registration Service Fees	No date specified	EPA is using discretionary refunds to avoid overpayment of fees. EPA addressed this issue in its fee category interpretations. Some disagreements remain with registrants. EPA looking for additional feedback.	
Fee category may not be changed, without providing the information to the applicant, after completion of the preliminary technical screening	No date specified, but inferred as effective 12/29/22	OPP and OGC are working with EPA on a position paper to implement this provision. Front-end processing delays have made this issue complicated.	
Automate Initial Content Screen	No date specified, but inferred as effective 12/29/22	EPA is updating the portal and pursuing automation. No specific timeline provided.	
Preliminary Technical Screen Requirements including- reduced risk determination, data waivers and fee category	No date specified, but inferred as effective 12/29/22	OPP and OGC are working with EPA on a position paper to implement this provision. Front-end processing delays have made this issue complicated.	

PRIA 5 Score Card: Process Improvement Implementation

Objective	Due Date	Comments	Status
Written renegotiation Notification to registrants including reason for renegotiation	No date specified, but inferred as effective 12/29/22	RD has issued 1 renegotiation since PRIA using this procedure. AD and BPPD report no renegotiations since PRIA 5.	Ed Messina memo issued 5/25/2023
Prioritizing Late or Renegotiated PRIA actions	No date specified, but inferred as effective 12/29/22	Registrants remain frustrated with the lack of transparency and EPA's inability to provide estimated completion dates when PRIA dates are missed. Delays with science reviews are particularly problematic.	Ed Messina memo issued 5/25/2023

PRIA 5 Score Card: Process Improvement Implementation

Metric	Quarter 1 (as of 2/27/24, unless indicated)	Quarter 2 (as of 6/14/24, unless indicated)	Quarter 3 (as of 8/18/24, unless indicated)	Quarter 4 (as of 12/1/24, unless indicated)
OPP Total FTEs As of 2/16/24	568 (approx = 24 hiring action actions in process)	561	558 (not including summer interns)	558 (not including summer interns)
Front-end processing backlog (per EPA, backlog is cleared as of 2/15/24)	From 6/1/23 – 2/15/24: - received approx. 7,860 packages - processed approx. 7,715 packages - approx. 145 still to be processed (about 6% PRIA and 94% non-PRIA)	From 6/1/23 – 3/30/24: - received approx. 9,310 packages - processed approx. 9,240 packages - approx. 70 still to be processed (about 10% PRIA and 90% non-PRIA)	No website update since 3/30/24. Due to resources, EPA has not updated the website recently. Staff report that there is no front-end backlog, but there are backlogs in the 21-day screening process.	From 1/1/24 – 10/30/24: • Received ≈ 9,435 packages • Processed ≈ 8,010 packages • ≈ 1,420 still to be processed (about 1% PRIA and 99% non-PRIA; ≈ 20% of the non-PRIAs are by notifications or fast track amendments)

Office of Pesticide Program Funding

Fiscal Year	EPM**	S&T***	STAG^	Total	Service Fees	Maintenance Fees	Total
2004					14.7	26.0	40.7
2005	117.7	4.8	13.0	135.5	10.6	27.0	37.6
2006	125.9	5.0	13.1	144.0	13.9	27.0	40.9
2007	125.9	5.0	13.1	144.0	13.1	21.0	34.1
2008	116.3	5.8	12.8	134.9	15.8	22.1	37.9
2009	116.4	7.9	13.0	137.3	16.1	21.8	37.9
2010	120.5	8.8	13.5	142.8	18.6	22.1	40.7
2011	116.2	7.0	13.5	136.7	11.6	22.7	34.3
2012	108.6	6.6	13.1	128.3	15.6	22.0	37.6
2013	103.2	6.2	12.4	121.8	15.2	27.0	42.2
2014	103.1	6.2	12.7	122.1	16.6	28.7	45.3
2015	101.3	6.0	12.7	120.0	17.1	27.7	44.8
2016	101.5	6.0	12.7	120.2	19.1	27.5	46.7
2017	101.2	6.0	12.7	119.9	18.3	28.0	46.3
2018	107.6	6.0	12.7	126.3	16.8	28.4	45.2
2019	109.8	6.0	12.7	128.5	18*	31*	49.0
2020	107.0	5.9	12.3	125.2	18*	32*	50.0
2021	109	5.9	12.3	127.2	19*	31*	50.0
2022	110.2	5.9	13.3	129.4	24.0	31.6	55.6
2023	120.3	6.2	14.0	140.5	20.6	40.1	60.7
2024	115.4	5.9	13.0	134.3	18.4	44.5	62.9

* Information derived from Quarterly Stakeholder Updates

** EPM is Environmental Programs and Management, where most staffing resources are allocated

*** S&T is Science & Technology, which research that supports agency regulatory decisions

^ STAG is State and Tribal Assistance Grants

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Metric	Quarter 1 (as of 2/27/24, unless indicated)	Quarter 2 (as of 6/14/24, unless indicated)	Quarter 3 (as of 8/18/24, unless indicated)	Quarter 4 (as of 12/1/24 unless indicated)
Antimicrobial Division				
Total Pending Actions	276	324	366	365
Number of Pending Late Actions	145	228	243	277
Percentage of Pending Actions that are late	52.54%	63.08%	65.03%	75.89%
Average days late	235	228	250	273
Average Percentage of time past the PRIA due date	80.23%	137.61%	152.64%	166.93%
Percentage of time past the PRIA due date by action type	- New Product: 109.89% - New Use: 41.26% - New AI: 11.44%	- New Product: 126.87% - New Use: 66.78% - New AI: 168.72%	- New Product: 134.13% - New Use: 80.58% - Other/Misc.: 189.64% - Amendment: 189.88% - New AI: 167.11%	- New Product 143.01% - New Use 95.12% - Other/Misc. 190.5% - Amendment 232.3% - New AI 187.32%
Total Pending Amendments*	2,800	1,349	1,275	1,213
Number of Pending Amendments that are over a year late	1,600	1,135	1,055	1,043
Percentage of Pending Amendments that are over a year late	57.14%	84.13%	82.74%	85.99%
Total Pending Notifications**	576	590	511	460
Number of Pending Notifications that are over a year late	74	113	107	173
Percentage of Pending Notifications that are over a year late	12.85%	19.15%	20.93%	37.6%

Metric	Quarter 1 (as of 2/27/24, unless indicated)	Quarter 2 (as of 6/14/24, unless indicated)	Quarter 3 (as of 8/18/24, unless indicated)	Quarter 4 (as of 12/1/24, unless indicated)
Biological and Pollution Prevention Division				
Total Pending Actions	310	324	348	321
Number of Pending Late Actions	121	149	148	149
Percentage of Pending Actions that are late	38.71%	44.14%	41.09%	46.73%
Average days late	330	389	406	361
Average Percentage of time past the PRIA due date	38.01%	89.64%	94.63%	91.7%
Percentage of time past the PRIA due date by action type	- Inert: 141.37% - New Product: 57.43% - New Use: 105.21% - Tolerance: -69.27% - New AI: 36.16%	- Inert: 312.88% - New Product: 997.1% - New Use: 354.95% - Tolerance: 155.2% - New AI: 84.8%	- Inert: 347.4% - New Product: 119.6% - New Use: 461.26% - Other/Misc.: 51.33% - Tolerance: 176.63% - Amendment: 75.09% - New AI: 87.88%	- Inert – 406.58% - New Product – 97.75% - New Use – 355.54% - Other/Misc. – 68.4% - Tolerance – 119.19% - Amendment – 95.77% - New AI – 81.95%
Total Pending Amendments	141	224	217	173
Number of Pending Amendments that are over a year late	75	82	82	79
Percentage of Pending Amendments that are over a year late	53.19%	36.60%	37.79%	45.66%
Total Pending Notifications	75	87	96	42
Number of Pending Notifications that are over a year late	17	19	22	9
Percentage of Pending Notifications that are over a year late	22.67%	21.84%	22.92%	21.43

Metric	Quarter 1 (as of 2/27/24, unless indicated)	Quarter 2 (as of 6/14/24, unless indicated)	Quarter 3 (as of 8/18/24, unless indicated)	Quarter 4 (as of 12/1/24, unless indicated)
Registration Division***				
Total Pending Actions	1,300	1,900	1,800	1,472
Number of Pending Late Actions	712	1,370	1,317	936
Percentage of Pending Actions that are late	54.14%	71.13%	70.46	63.59%
Average days late	179	447	474	410
Average Percentage of time past the PRIA due date	28.05%	89.64%	113.18%	110.09%
Percentage of time past the PRIA due date by action type	- Inert: 58.55% - New Product: 57.9% - New Use: 13.4% - Tolerance: 34.02% - New AI: 2.8%	- Inert: 71.4% - New Product: 152.84% - New Use: 100.69% - Tolerance: 178.1% - New AI: 75.69%	- Inert: 78.54% - New Product: 157.23% - New Use: 110.39% - Other/Misc.: 96.76% - Tolerance: 203.08% - Amendment: 108.68% - New AI: 83.16%	- Inert – 115.65% - New Product – 119.38% - New Use – 104.94% - Other/Misc. – 163.65% - Tolerance - 178.97% - Amendment – 107.61% - New AI – 78.47%
Total Pending Amendments	725	1,478	1,370	1,068
Number of Pending Amendments that are over a year late	481	1,016	967	754
Percentage of Pending Amendments that are over a year late	66.34%	68.74%	70.58%	70.6%
Total Pending Notifications	1,200	1,038	892	642
Number of Pending Notifications that are over a year late	783	608	517	388
Percentage of Pending Notifications that are over a year late	65.3%	58.57%	57.96%	60.44%

* Amendments do not items such as registration review submissions and incident data

** Statistics regarding notifications do not include mass close outs

***Registration Division statistics from Quarter 1 reflect incomplete data prior to the final migration of RD data into Salesforce.