

Mill Assessment Study: Workload Analysis

Agreement #21-C0060

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Executive Summary

Crowe LLP (Crowe) prepared this Workload Analysis Report (report) on behalf of the Department of Pesticide Regulation (DPR) as part of the Mill Assessment Study. This report provides the results of Crowe’s workload analysis of DPR’s Pesticide Programs and Administration and builds off the mill usage considerations described in the Mill Alternatives Concept Paper (Concept Paper) released in December 2022 – both serving as foundational tools to meet the study’s six (6) objectives, listed in **Exhibit ES-1**. This report has three (3) primary goals:

1. Describe DPR’s current programmatic needs reflected within its Fiscal Year (FY) 2022/23 budget
2. Identify DPR’s future programmatic needs, including preliminary estimates for initial mill related responsibilities associated with implementing recommendations included in the Sustainable Pest Management Roadmap for California (SPM Roadmap), based on our workload analysis
3. Summarize potential funding implications, including estimated revenue requirements and associated rate(s) to support DPR’s current and future programmatic needs for its mill related responsibilities.

This report will serve as a supporting document for mill recommendations and additional stakeholder consultation, in anticipation of future budget change proposals by DPR.

Exhibit ES-1 Mill Assessment Study Objectives

	<p>Examine current and future funding needs for DPR while also considering the County Agricultural Commissioners (CAC) funding associated with mill-related responsibilities.</p>
	<p>Examine existing structure and rate of the mill assessment.</p>
	<p>Examine current and future revenues produced by that structure and rate.</p>
	<p>Examine detailed options that incentivize the use of safer sustainable pest management practices across the state of California.</p>
	<p>Examine incentivization options, including “tiering the mill assessment,” to incentivize the use of safer pest management tools, as well as evaluating strategies for linking how revenues are collected to the broader mission of DPR.</p>
	<p>Examine long-term sustainable funding that allows DPR to continue to fulfill its mission.</p>

This report contains the following five (5) sections and four (4) Appendices:

1. **Introduction** – We first summarize the Mill Assessment Study background, including an overview of the study objectives and profile of the mill assessment. We then provide an overview of DPR's Pesticide Programs and Administration, including the department's authorized functions, organization, resources, funding sources, and a summary of its fiscal status from FY2014/15 to FY2022/23.
2. **Methodology** – In this section, we describe our approach to prepare this report.
3. **Current Programmatic Needs** – In this section, we describe DPR's current programmatic needs, focusing on its personal services related expenditures, reflected within its FY2022/23 budget to carry out its authorized functions.
4. **Future Programmatic Needs** – In this section, we identify DPR's estimated future programmatic needs, including initial estimates of programmatic needs to support the implementation of the SPM Roadmap, based on our workload analysis.
5. **Estimated Mill Funding Implications** – In this section, we summarize estimated mill revenue requirements and mill rates to support DPR's current programmatic needs presented in *Section 3* and future programmatic needs based on our workload analysis summarized in *Section 4*.
6. **Appendix A** – In *Appendix A*, we provide a detailed summary of the Department of Pesticide Regulation Fund's condition from FY2014/15 through FY2022/23.
7. **Appendix B** – In *Appendix B*, we provide a summary of DPR's funding authority for its programmatic functions.
8. **Appendix C** – In *Appendix C*, we provide a summary of detailed current workload activities by branch that serve as examples of the workload activities that flow into each of DPR's authorized programmatic functions.
9. **Appendix D** – In *Appendix D*, we provide a summary of position classification title and average salaries that were used to calculate DPR's future programmatic needs, detailed in *Section 4* of this report. Crowe referenced California Department of Human Resources (CalHR) to obtain this information.

A. Current Programmatic Needs

DPR's current programmatic needs are primarily funded by regulatory fees, with limited funding from federal funds, special funds, and reimbursements from other departments. The Department of Pesticide Regulation Fund – DPR's main fund – collects three (3) primary sources of revenue: 1) the quarterly mill assessment on pesticide sales (roughly 80% of revenues), pesticide registration fees from over 13,750 registrants (roughly 16% of revenues), and licensing and certification fees from individual commercial applicators and dealers (roughly 4% of revenues).

DPR's current programmatic needs reflected in its FY2022/23 budget for mill related responsibilities total approximately \$102.1 million – nearly 80 percent of \$132.6 million in needs supported by the Department of Pesticide Regulation Fund.¹ As shown in **Exhibit ES-2**, DPR's mill programmatic needs include approximately \$47.1 million to support personal services related expenditures (i.e., support for authorized positions) and approximately \$55.0 million to support other needs including CACs (\$34.7 million), operating and equipment expenditures (\$11.8 million), external agency fund users² (\$4.4 million), and shares of pro rata and supplemental pension obligations (\$4.1 million).

DPR's authorized programmatic functions for its mill related responsibilities represent 65 percent of the department's estimated distribution of authorized programmatic functions, as shown in **Exhibit ES-3**. DPR's mill related authorized functions include: Monitoring and Surveillance: (15%), Enforcement (14%), Human Health and Environmental Assessment (9%), Mitigation of Human Health Risks (8%), Mitigation of Environmental Health Risks (8%), Pest Management (5%), Mill Assessment (4%), and Pesticide Use Reporting (2%). DPR's registration programmatic function accounts for 29% of the department's overall authorized programmatic functions and its licensing and certification function accounts for 6% of its overall functions.

¹ The Department of Pesticide Regulation Fund supports roughly 85 percent of the department's FY2022/23 current programmatic needs (i.e., \$132.6 million out of \$156.3 million total budgeted expenditures from all funds). DPR's FY2022/23 current programmatic needs are also supported by the General Fund (\$27.9 million), California Environmental License Plate Fund (\$653,000), Federal Trust Fund (\$2.4 million), Reimbursements (\$610,000), and Cannabis Control Fund (\$2.7 million). It is important to note funding from the General Fund reflects temporary support. We describe DPR's funding status from all funds within Section 1, Subsection D "Funding Department of Pesticide Regulation's Pesticide Programs and Administration".

² External agency fund users include California Environmental Protection Agency (CalEPA), California Department of Toxic Substances Control, California Department of Resources Recycling and Recovery, California Office of Environmental Health and Hazard Assessment, California Department of Public Health, and Commission on State Mandates.

Exhibit ES-2
FY2022/23 Estimated Total Current Programmatic Needs

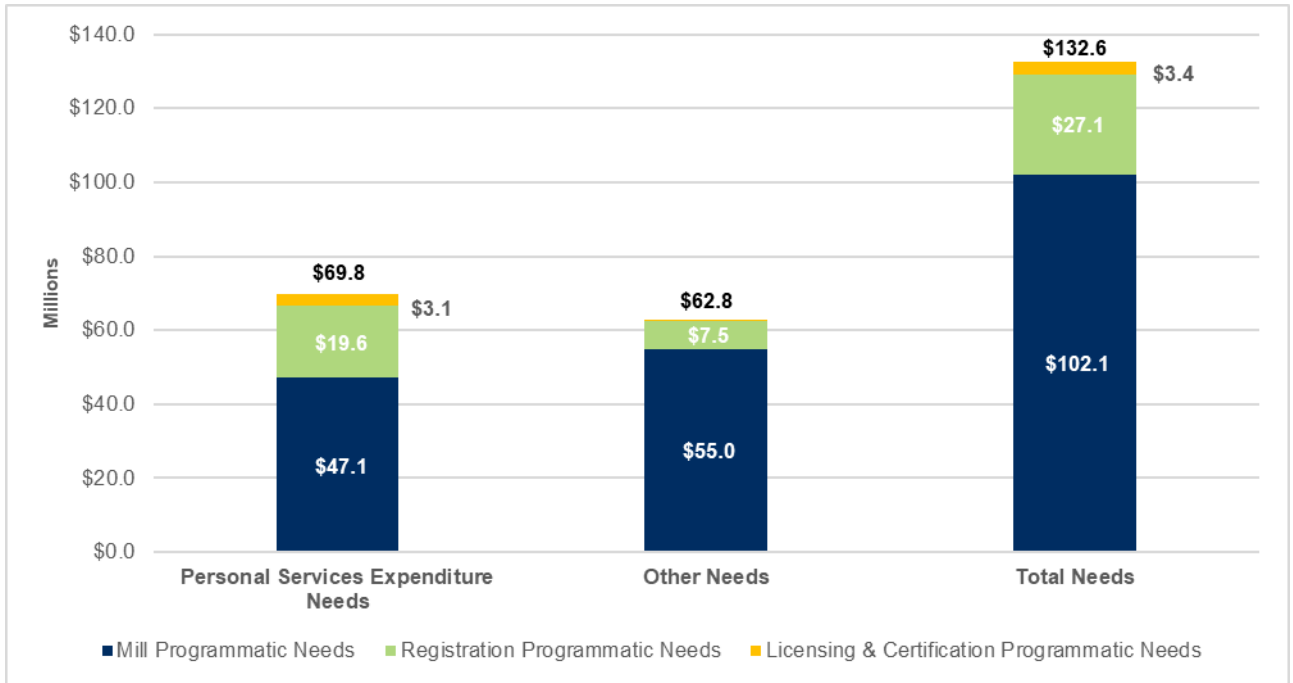
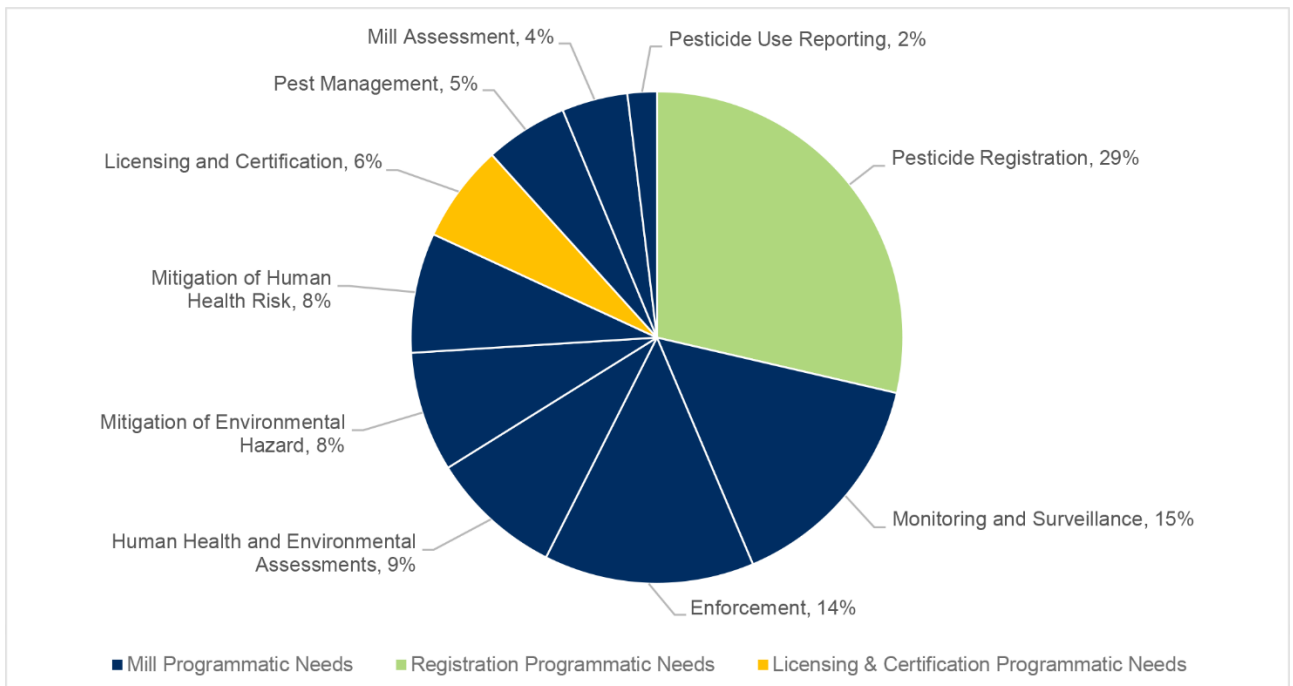


Exhibit ES-3
FY2022/23 Estimated Distribution of Authorized Functions



B. Future Programmatic Needs

DPR's future programmatic needs based on our workload analysis, shown in **Exhibit ES-4**, total approximately \$16.1 million for its mill related responsibilities – roughly 56 percent of the department's \$28.6 million in future programmatic needs. DPR's \$16.1 million in future programmatic needs for its mill related responsibilities include approximately \$2.8 million in estimated needs to support the early implementation of the Sustainable Pest Management Roadmap for California³, released on January 26, 2023, in collaboration with CalEPA, and California Department of Food and Agriculture (CDFA).

The estimates for DPR's initial mill related responsibilities associated with implementing recommendations included in the SPM Roadmap reflect a preliminary analysis of the department's initial projected needs. DPR is currently conducting a comment period on the implementation of the SPM Roadmap. It is important to note that the SPM related future programmatic needs identified in this report reflect a subset of the department's overall needs to support the implementation of the SPM Roadmap's priorities. The SPM Roadmap calls on the state to develop a plan, funding mechanisms, and programs to prioritize pesticides for reduction, and to support the practice change necessary to transition away from the use of high-risk pesticides in agricultural and nonagricultural settings.

DPR's \$16.1 million in future programmatic needs for its mill related responsibilities, including estimated needs to support the implementation of the SPM Roadmap, are primarily driven by additional needs to carry out enforcement (\$5.0 million), integrated pest management (\$3.4 million, which includes \$1.8 million in SPM related needs), environmental monitoring (\$1.9 million), human health assessment (\$1.7 million, which includes \$1.0 million in SPM related needs), worker health and safety (\$340,000), and mill assessment (\$340,000) functions. In addition, DPR's future programmatic needs include support for administration (\$3.4 million).

DPR's current and future programmatic needs for mill related responsibilities, including initial estimated programmatic needs to support the implementation of the SPM Roadmap, total roughly \$118.2 million, as shown in **Exhibit ES-5**. DPR's total programmatic needs to support its current and future programmatic needs for its mill related responsibilities equates to roughly a 16% increase in overall needs.

³ The Sustainable Pest Management Roadmap for California Roadmap (SPM Roadmap) was developed over the course of nearly two years by a diverse group of stakeholders representing conventional and organic agriculture, urban environments, community and environmental groups, tribes, researchers, and government. The SPM Roadmap charts the course for accelerating the state's systemwide transition to sustainable management and eliminating and replacing of prioritized high-risk pesticides by 2050.

Exhibit ES-4
Distribution of Future Programmatic Needs (in millions)

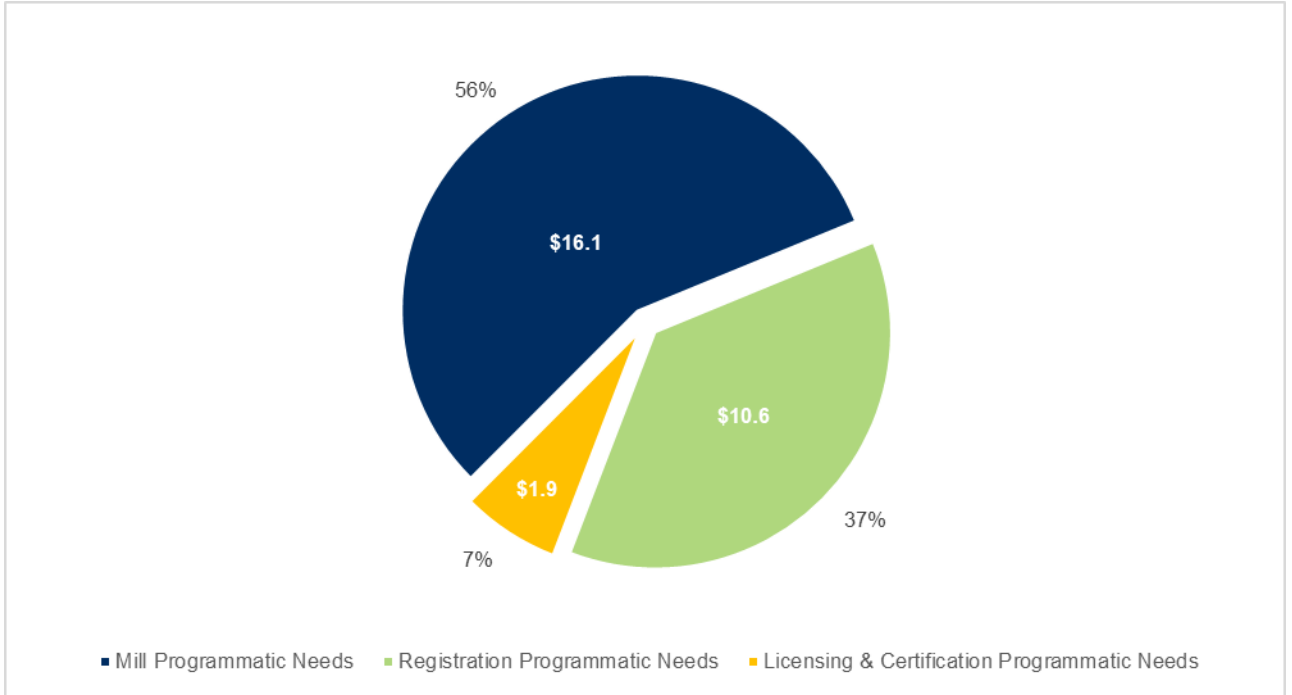
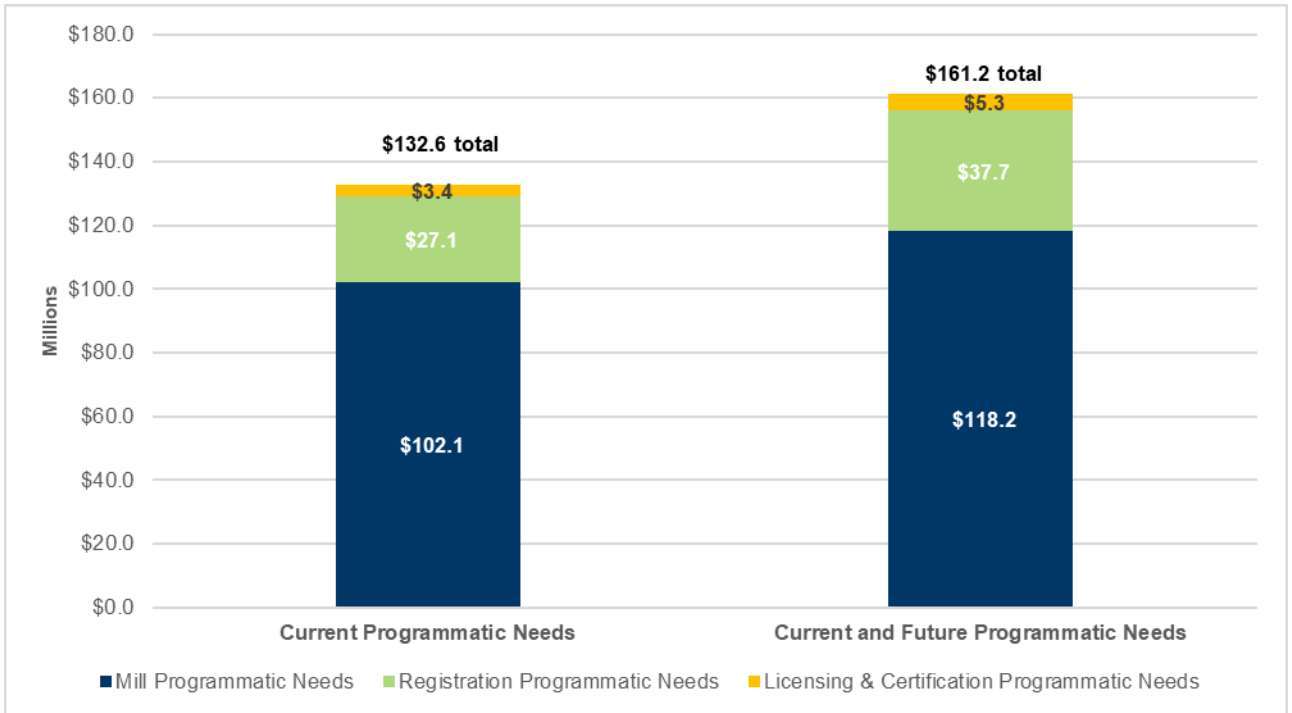


Exhibit ES-5
Summary Comparison of Estimated Current and Future Programmatic Needs



C. Estimated Mill Funding Implications

DPR’s estimated total revenue requirement to support its current and future programmatic needs for mill related responsibilities, including estimated needs to support the initial implementation of the SPM Roadmap, is approximately \$118.2 million, as shown in **Exhibit ES-6**. Assuming FY2021/22 pesticide sales⁴, DPR would need a \$0.0232 mill rate to support its current programmatic needs. This equates to roughly a 10.5% increase to the current mill rate of \$0.021. To support the future programmatic needs identified in this report, including SPM Roadmap-related needs, DPR would need roughly an incremental rate of \$0.0037. Together, DPR’s estimated total revenue requirement of approximately \$118.2 million requires a minimum mill rate of \$0.0269 or a 27.9% increase to the current mill assessment rate.

In **Exhibit ES-7**, we provide an example of a mill rate “build-up” accounting for the \$0.0269 total minimum mill rate to support DPR’s current and future programmatic needs. Assuming FY2021/22 pesticide sales, the current mill rate of \$0.021 is not adequate to support DPR’s current and future programmatic needs.

Finally, in **Exhibit ES-8**, we provide a range of estimated mill rates to support DPR’s current and future programmatic needs for its mill related responsibilities of approximately \$118.2 million assuming potential changes from FY2021/22 pesticide sales levels. For example, a 20% increase in FY2021/22 pesticide sales levels would equate to a \$0.0224 minimum mill rate, whereas a 20% decrease in FY2021/22 pesticide sales would equate to a \$0.0336 minimum mill rate to generate the same amount of mill revenue.

The estimated total revenue requirement, shown in Exhibit ES-6, and minimum mill rate to support DPR’s current and future programmatic needs, shown in Exhibit ES-7, do not account for *additional* funding to support other programmatic needs described in the Concept Paper, including additional funding for CACs, California Department of Food and Agriculture (CDFA), potential reserve needs, other needs, and positive incentives.⁵ Crowe will continue to consult DPR, CACs, CDFA, and interested stakeholders to obtain feedback on these other mill usage considerations described in the Concept Paper to develop mill recommendations.

Exhibit ES-6
Estimated Total Revenue Requirement

Programmatic Needs	Total	Incremental Mill Rate ⁶	% Increase
Current Programmatic Needs	\$102,100,000	\$0.0232	10.5%
Future Programmatic Needs	\$16,100,000	\$0.0037	17.4%
Estimated Total Revenue Requirement	\$118,200,000	\$0.0269	27.9%

⁴ FY2021/22 estimated pesticide sales totaled roughly \$4.4 billion. Excluding FY2020/21, estimated pesticide sales have, on average, increased roughly 3 percent year-to-year. In FY2020/21, pesticide sales increased nearly 12 percent largely due to a response to the COVID-19 pandemic.

⁵ The Concept Paper identified options to create positive incentives where DPR could potentially utilize mill revenues to support the transition to safer, sustainable pest management. Positive incentives include, but are not limited to research and grants, environmental and human health monitoring, registration of new alternative products, etc.

⁶ Programmatic needs divided by FY2021/22 estimated pesticide sales of approximately \$4.4 billion.

Exhibit ES-7
Estimated Total Revenue Requirement
Example of Minimum Mill Rate to Support Current and Future Programmatic Needs

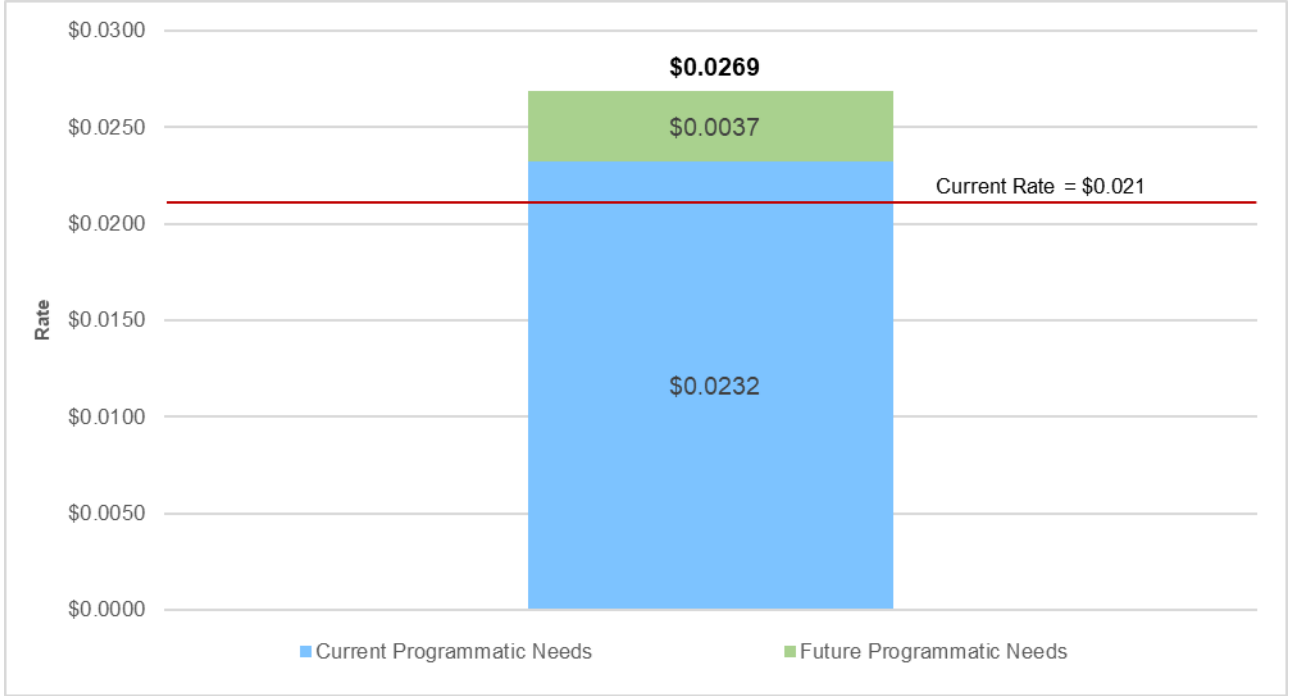
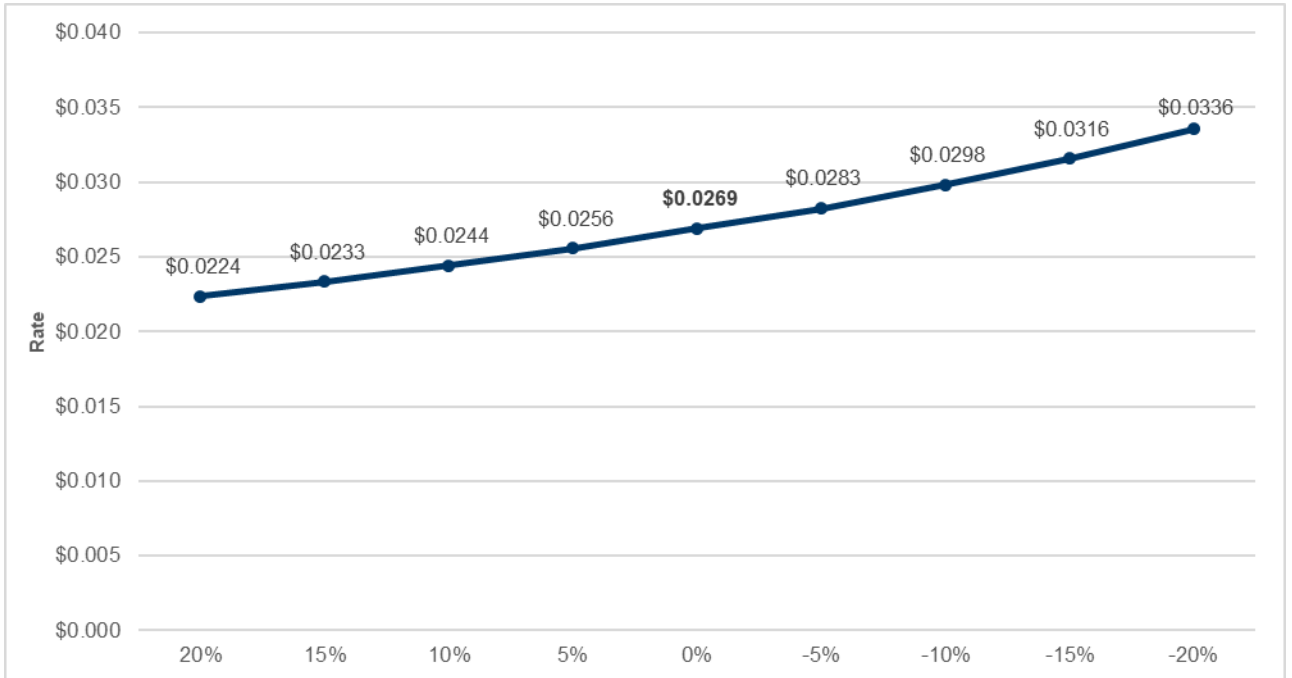


Exhibit ES-8
Minimum Mill Rate to Support Current and Future Programmatic Needs
Assuming Changes Compared to FY2021/22 Pesticide Sales



D. Other Potential Mill Funding Needs and Next Steps

The identification of DPR's future programmatic needs for its mill related responsibilities, including initial estimates associated with implementing recommendations from the SPM Roadmap, provides a basis for the determination as to how, and to what extent, mill revenues are utilized to support the department's Pesticide Programs and Administration functions – a key consideration raised in the Concept Paper. Additional funding to support CACs, CDFA, reserve needs, and positive incentives (e.g., research and grants, environmental and human health monitoring, registration of new alternative products, etc.) would likely impact DPR's revenue requirement and associated mill rate(s). As a next step, Crowe will continue to evaluate the results presented in this report along with other potential mill funding needs to develop our mill recommendations. Crowe's eventual mill recommendations resulting from the Mill Assessment Study will also provide our analysis of mill design and implementation considerations presented in the Concept Paper.

1. Introduction







A. Purpose

Crowe LLP (Crowe) prepared this Workload Analysis Report (report) on behalf of the Department of Pesticide Regulation (DPR) as part of the Mill Assessment Study. This report provides the results of Crowe’s workload analysis of DPR’s Pesticide Programs and Administration and builds off the mill usage considerations described in the Mill Alternatives Concept Paper (Concept Paper) released in December 2022 – both serving as foundational tools to meet the study’s six (6) objectives, listed in **Exhibit 1-1**. This report has three (3) primary goals:

1. Confirm DPR’s current programmatic needs reflected within its Fiscal Year (FY) 2022/23 budget
2. Identify DPR’s future programmatic needs, including preliminary estimates for initial mill related responsibilities associated with implementing recommendations included in the Sustainable Pest Management Roadmap for California (SPM Roadmap), based on our workload analysis
3. Summarize potential funding implications, including estimated revenue requirements and rate(s) to support DPR’s current and future programmatic needs for its mill related responsibilities.

This report will serve as a supporting document for mill recommendations and additional stakeholder consultation, in anticipation of future budget change proposals by DPR.

Exhibit 1-1 Mill Assessment Study Objectives

	<p>Examine current and future funding needs for DPR while also considering the County Agricultural Commissioners (CAC) funding associated with mill-related responsibilities.</p>
	<p>Examine existing structure and rate of the mill assessment.</p>
	<p>Examine current and future revenues produced by that structure and rate.</p>
	<p>Examine detailed options that incentivize the use of safer sustainable pest management practices across the state of California.</p>
	<p>Examine incentivization options, including “tiering the mill assessment,” to incentivize the use of safer pest management tools, as well as evaluating strategies for linking how revenues are collected to the broader mission of DPR.</p>
	<p>Examine long-term sustainable funding that allows DPR to continue to fulfill its mission.</p>

B. Background

In February 2022, DPR contracted with Crowe to conduct a study on the mill assessment, engage and consult stakeholders throughout the various stages of the study, and issue a final report outlining proposed mill options. Crowe will provide DPR with a detailed plan including mechanisms to implement the options recommended as a result of the study.

In December 2022, Crowe prepared a Concept Paper outlining mill design, usage, and implementation considerations for review and feedback by DPR and interested stakeholders to support the development of mill recommendations. The Concept Paper addressed foundational questions on how the mill should be structured and utilized but did not address specific mill revenue levels or mill rates to support DPR's current and future programmatic needs. This report details the estimated level of funding needed for DPR to finance its current programmatic needs along with its future programmatic needs.

Over the past decade, DPR has experienced an expansion in its workload as a result of new laws, regulations, court orders, and other demands. In the FY2021/22 state budget, DPR was allocated one-time General Funds to embark on a comprehensive study of its mill assessment that examines:

- The existing structure and rate of the mill assessment
- Current and future funding needs for DPR, including strategies for linking how revenues are collected to support DPR's broader mission objectives and support for the state's transition to sustainable pest management
- Existing County Agricultural Commissioners (CAC) funding associated with mill-related responsibilities and future needs
- Detailed options that incentivize the use of safer sustainable pest management across the state of California
- Current and future revenues produced by proposed structures and rates to provide long-term sustainable funding that allows DPR to continue to fulfill its mission.

Safe and Sustainable Pest Management (SPM)

In the FY2022-23 Budget Summary, the Governor's Office reported the following:

"As part of its mission, the Department of Pesticide Regulation is working to accelerate the transition to safer, more sustainable pest management practices that protect human health and the environment. This transition includes a focus on the effectiveness of pest management in maintaining public safety, supporting food production, and protecting California's natural resources, with an emphasis on broad compliance efforts. Enhanced enforcement of the state's pesticide use laws and regulations will further improve the health of communities across the state, including workers, and protect the environment."

Over the last two years, DPR received support from the General Fund to accelerate the transition to safer, more sustainable pest management. Specifically, DPR received funding to convene a work group to develop a plan to accelerate the transition to safer, more sustainable pest management, which resulted in the SPM Roadmap, released on January 26, 2023. In addition, DPR received funding to enhance existing scientific and grant programs, support environmental monitoring activities, support for the pesticide notification network, strengthen enforcement and community engagement activities, and, finally, examine the mill assessment through the Mill Assessment Study to identify future options that provide sustainable, long-term funding and support safer, more sustainable pest management practices.

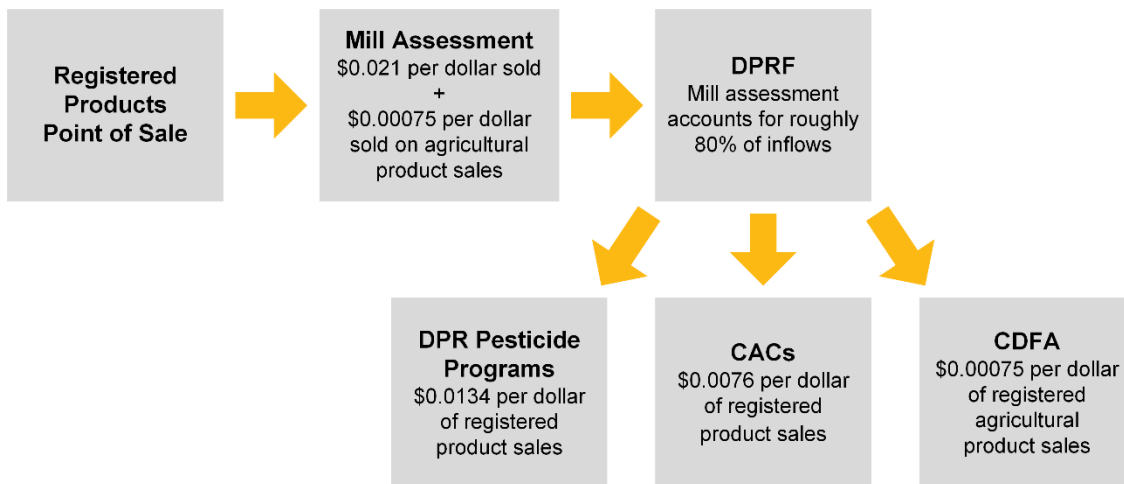
Profile of the Mill Assessment

DPR’s primary funding mechanism, a mill assessment levied on the sale of registered pesticides at the point of first sale into the state, has not been updated in nearly 20 years. The current mill assessment fee was established in 2004 and is currently set⁷ at a rate of 21 mills, or 2.1 cents on each dollar of registered pesticide product sales. DPR assesses an additional 0.75 mills, or .075 cents on the sale of agricultural use pesticides.⁸

DPR’s mill assessment revenues flow into the Department of Pesticide Regulation Fund, as illustrated in **Exhibit 1-2**, pursuant to FAC section 12841(g). Approximately 80 percent of the Department of Pesticide Regulation Fund’s revenue is generated by inflows from the mill assessment. Other revenue sources that flow into the Department of Pesticide Regulation Fund include fees on pesticide registrations and professional licenses, which account for roughly 20 percent of the fund’s inflows. Mill assessment revenues primarily support the following:

1. DPR’s Pesticide Programs and Administration: Mill assessment revenues derived from 13.4 out of 21 mills levied on registered pesticide product sales fund the department’s various Pesticide Programs and Administrative branches. DPR receives roughly 63.8 percent of mill assessment revenues. DPR’s programs are also funded by fees on pesticide registrations and professional licenses.
2. County Agricultural Commissioners (CACs): Mill assessment revenue derived from 7.6 mills out of 21 mills levied on registered pesticide product sales is distributed to California’s 55 CACs performing local pesticide enforcement activities pursuant to federal and state pesticide laws and regulations. The CACs receive roughly 36.2 percent of mill assessment revenues.
3. California Department of Food and Agriculture (CDFA): Mill assessment revenue derived from 0.75 mills levied on the sale of registered agricultural use pesticides funds the CDFA’s Consultation and Analysis Unit (CAU). The CAU focuses on potential pesticide regulatory impacts and pest management alternatives that may mitigate or prevent such impacts on production agriculture.

**Exhibit 1-2
Mill Assessment Flow**



⁷ The maximum assessment rate is set by statutes in California Food and Agricultural Code (FAC) sections 12841/12841.1. The Director sets the actual rate by regulation in Title 3 of the California Code of Regulations (3 CCR) section 6386 (Established Rate).

⁸ FAC section 12841.1(a) requires an additional assessment be collected on sales of all pesticides, except those labeled solely for home, industrial, or institutional use. Therefore, a pesticide label that contains any "agricultural use" sites and applications will be subject to the additional mill assessment.

C. Overview of Department of Pesticide Regulation's Pesticide Programs and Administration

DPR's mission is to protect human health and the environment by regulating pesticide sales and use, and by fostering reduced-risk pest management. DPR's program authority is primarily coded and described within the FAC, Divisions 2, 6, and 7. DPR's regulations are primarily coded within Title 3 CCR. FAC Section 11501 sets forth DPR's six (6) primary mandates:

1. To provide for the proper, safe, and efficient use of pesticides essential for production of food and fiber and for protection of public health and safety
2. To protect the environment from environmentally harmful pesticides by prohibiting, regulating, or ensuring proper stewardship of those pesticides
3. To assure agricultural and pest control workers of safe working conditions where pesticides are present
4. To permit agricultural pest control by competent and responsible licensees and permittees under strict control of DPR and the County Agricultural Commissioners
5. To assure consumers and users that pesticides are properly labeled and appropriate for the use designed by the label and that state or local government dissemination of information on pesticide uses of any registered pesticide product is consistent with the uses for which the product is registered
6. To encourage the development and implementation of pest management systems, stressing application of biological and cultural pest control techniques with selective pesticides when necessary to achieve acceptable levels of control with the least possible harm to the public health, nontarget organisms, and the environment.

Pesticide Programs protect California's residents and the environment from adverse pesticide impacts with particular emphasis on the protection of children, vulnerable populations, workers, and communities. DPR's various branches within its Pesticide Programs, with support from its Administration branches, carry out its mission and mandates, and will be responsible for critical aspects of the SPM Roadmap's implementation, through ten key programmatic functions, described in **Exhibit 1-3**. DPR has utilized these functions for over 20 years to account for the department's programmatic needs (i.e., personal services, and operating and equipment expenditures) to carry out its statutory requirements. DPR's programmatic needs for its Administration branches are distributed across these functions. In *Appendix C*, we profile key funding authorities for DPR's Pesticide Programs and Administration.

**Exhibit 1-3
Pesticide Program Functions, Descriptions, and Key Funding Authorities**

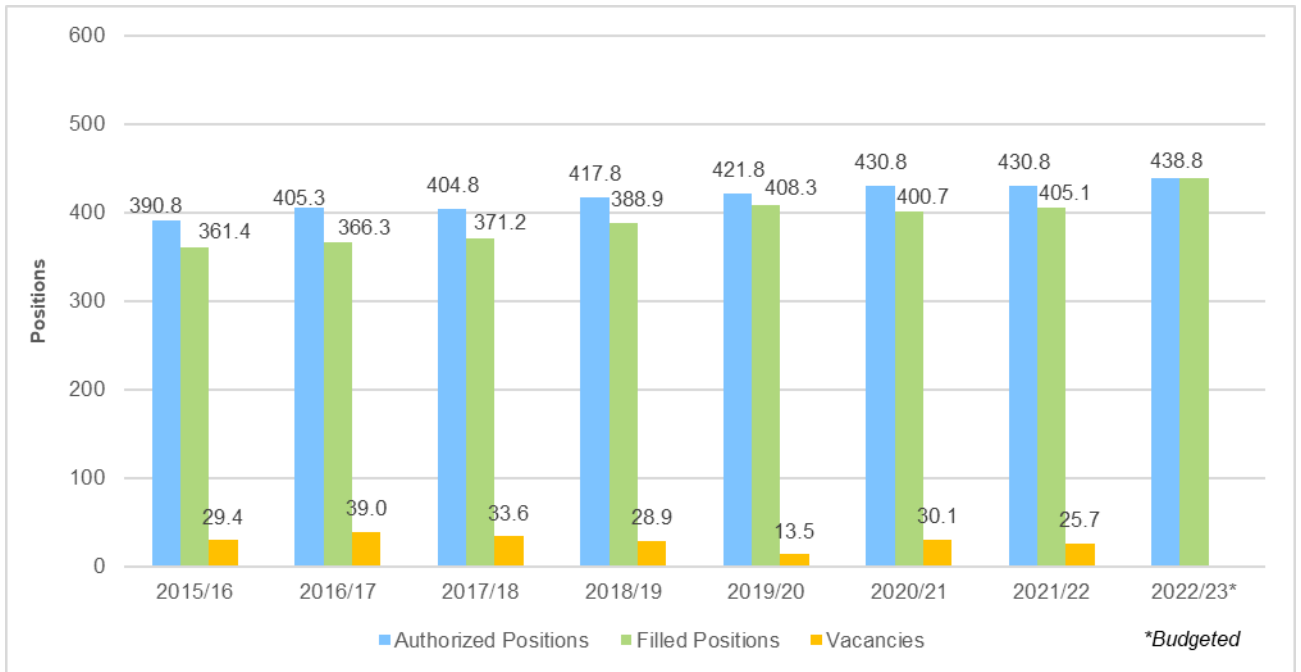
Function	Description	Key Funding Authorities
<p>1. Pesticide Registration</p>	<p>Pesticides must be registered (licensed) with the state before they can be sold or used in California. DPR uses scientific, legal, and administrative evaluations of a pesticide before its registration. Activities include but are not limited to process and track pesticide product registration and amendment application submissions, coordinate data evaluations, prepare public reports and notices regarding registration decisions and respond to public comments on registration decisions, maintain pesticide label files and data volume archive, maintain pesticide product label database and data index, coordinate human health risk assessment/mitigation process and reevaluations, and provide information on registered pesticides and label instructions to pesticide enforcement agencies and the public.</p>	<p>FAC §12784; FAC §12811; FAC §12812; FAC §12818; FAC §12824; FAC §12825; FAC §12825.5</p>
<p>2. Human Health and Environmental Assessments</p>	<p>Risk assessment including but not limited to the following activities: hazard identification, dose-response assessment, exposure assessment, and preparation of a risk characterization document that assesses potential dietary, workplace, residential, and ambient air exposures.</p>	<p>FAC §11454.1; FAC §13121-13135; FAC §13141-13152; FAC §14004.5; FAC §14021-14027; FAC §12825.5</p>
<p>3. Licensing and Certification</p>	<p>Ensures people selling, possessing, storing, handling, applying, or recommending the use of pesticides are competent and knowledgeable in their safe use. Conducts licensing exams and issues and renews licenses for pest control businesses, pesticide brokers and dealers, dealer designated agents, pest control advisers, pest control pilots, and pesticide applicators.</p>	<p>FAC §11502 and 11502.5; FAC §14006.5-14009; FAC §13186.5; FAC §15201</p>
<p>4. Pesticide Use Reporting</p>	<p>Collects, analyzes, and reports on statewide pesticide use reporting data relating to agricultural use and a subset of non-agricultural use; works with local CACs to ensure data quality; responds to external data inquiries and data requests.</p>	<p>FAC§12979; FAC§13186</p>
<p>5. Monitoring and Surveillance</p>	<p>Pursuant to California law, DPR must continuously evaluate pesticides after they are in use to protect the public and environment. Activities include but are not limited to analysis of hazards and developing pollution prevention strategies, investigation, and evaluation of pesticide illnesses, testing of fresh produce, and various exposure monitoring (including workers and bystanders).</p>	<p>FAC §14006.5-14009; FAC §14010-14015; FAC §12532 and 12534; FAC §12824; FAC §12825.5; FAC §12581; FAC §12671; FAC §12996-13000.1</p>
<p>6. Mitigation of Human Health Risk</p>	<p>Using scientific data to develop measures that reduce human exposure to pesticides that have unacceptable risks. Activities include but are not limited to reviewing data to assess worker health impacts of pesticide use, developing mitigation strategies, and preparing health and safety recommendations for workers and bystanders for incorporation into regulations and permit conditions.</p>	<p>FAC §11454.1; FAC §13121-13135; FAC §13141-13152; FAC §14004.5; FAC §14021-14027; FAC §12824; FAC §12981; FAC §13129; FAC §14005; FAC §14024</p>
<p>7. Mitigation of Environmental Hazard</p>	<p>Using scientific data to develop measures that protect the environment from potentially adverse effects of pesticides. Activities include but are not limited to developing mitigation strategies, proposing label changes, placing conditions on registration, regulations, and permit conditions.</p>	<p>FAC §13141-13152; FAC §14021-14027; FAC §14005; FAC §14024</p>

Function	Description	Key Funding Authorities
8. Pest Management	Pest management assesses the impacts and potential problems resulting from pesticide use, with a focus on preventive solutions that incorporate integrated pest management (IPM). Activities include but are not limited to facilitating adoption of IPM in schools, awarding grants to encourage development and use of alternatives to pesticides, and evaluating pest management practices.	FAC §12841.2; FAC §13183; FAC §13185; FAC §13186.5
9. Enforcement	Enforcement of pesticide use largely carried out by California Agricultural Commissioners (CACs) with DPR headquarters providing CACs with training, coordination, and technical and legal support. Activities include but are not limited to enforce federal pesticide tolerances on raw agricultural commodities, issuing enforcement actions, conducting pesticide misuse investigations, developing statewide enforcement priorities and guidance, evaluating CAC performance under annual work plans, and researching and analyzing compliance trends.	FAC §11501.5; FAC §2281; FAC §12581; FAC §12601; FAC §12642; FAC §12991; FAC §12996-13000.1; FAC §12999.4; FAC §11791 and 11792; FAC §11891-11894; FAC §12999.5; BPC §8616 and 8616.; BPC §8662
10. Mill Assessment	Ensures pesticide products are registered before sale and use, that they are labeled correctly, and that required fees have been paid. Activities include but are not limited to inspecting products offered for sale, reviewing labels to ensure they are registered, auditing pesticide sellers, and responding to sellers in violations of requirements	FAC §12841; FAC §12881-12885; FAC §12992; FAC §12993; FAC §12995

DPR’s Resources

DPR performs its programmatic and administrative functions with a team of over 400 personnel. Roughly 75 percent of DPR’s resources are in its Pesticide Programs and 25 percent perform Administration functions (including fiscal and business services, human resources, legal, information technology, communications, environmental justice, and community outreach). **Exhibit 1-4** illustrates authorized positions, filled positions, and vacancies for FY2014/15 through the current fiscal year. Authorized positions have increased roughly five (5) percent over the last five (5) years, less than a two (2) percent year-to-year change, to meet increased workload needs. On average, the department has maintained roughly 28.0 vacant positions, a 6 percent vacancy rate, since FY2014/15.

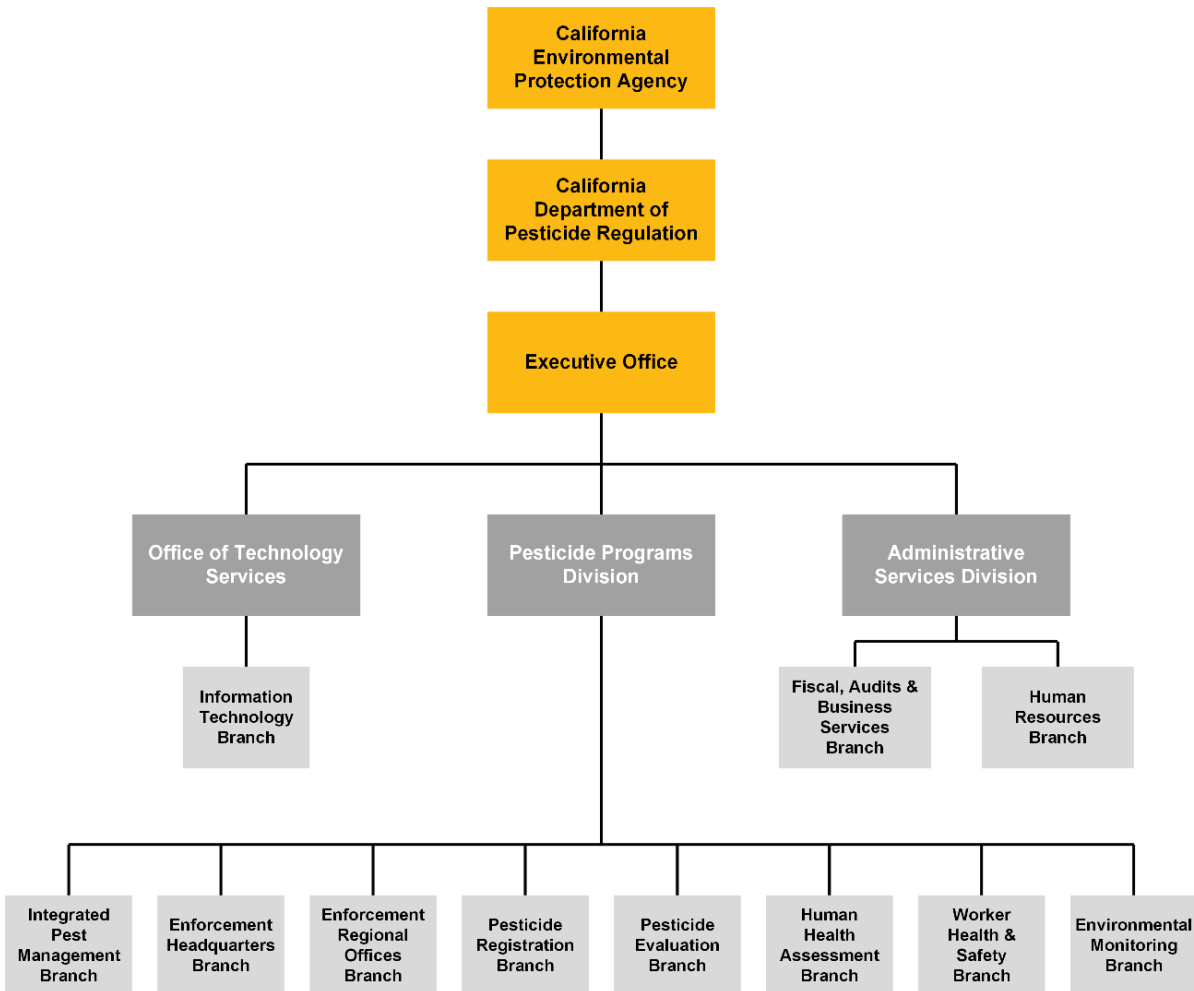
Exhibit 1-4
Authorized Positions, Filled Positions, and Vacancies
FY2015/16 through FY2022/23



DPR’s Organization

Exhibit 1-5 illustrates the department’s current organizational units. DPR’s Pesticide Programs include the following nine (9) organizational units: 1) Pesticide Programs Division, 2) Integrated Pest Management Branch, 3) Enforcement Headquarters Branch, 4) Enforcement Regional Offices Branch, 5) Pesticide Registration Branch, 6) Pesticide Evaluation Branch, 7) Human Health Assessment Branch, 8) Worker Health and Safety Branch, and 9) Environmental Monitoring Branch. DPR’s Administration includes the following four (4) organizational units: 1) Executive Office, 2) Fiscal, Audits, and Business Services Branch, 3) Human Resources Branch, and 4) Office of Information Technology. **Exhibits 1-6** profiles the nine (9) organizational units within DPR’s Pesticide Programs and **Exhibit 1-7** profiles the four (4) organizational units within DPR’s Administration.

Exhibit 1-5 DPR’s Current Organization



**Exhibit 1-6
Pesticide Programs Profile**

Organizational Unit	Profile
Pesticide Programs Division	Manages and oversees all Pesticide Program Branches and helps with coordination and communication between branches to carry out activities.
Enforcement Headquarters Branch	Responsible for developing and maintaining statewide guidance and policies on enforcing federal and state laws and regulations on use and sales of pesticides. Oversees and conducts statewide training of CAC inspectors and other staff to ensure uniform and consistent following of procedures. Conducts inspections of pesticide producers and products in the channels of trade to ensure compliance with state and federal laws. Manages the statewide pesticide residues testing programs. Develops state level enforcement and licensing action cases. Manages the statewide pesticide-use enforcement data system. Performs research and analysis of inspections and investigations to determine compliance patterns, evaluate CAC effectiveness, and to support enforcement actions. Responsible for examining and licensing or certifying pesticide applicators, pest control aircraft pilots, pest control dealers and brokers, agricultural pest control advisers, and businesses that apply pesticides or use pest control methods/devices for hire. Coordinates the Agricultural Pest Control Advisory Committee, a stakeholder committee advising DPR on licensing and certification, education requirements, study materials, and examinations.
Enforcement Regional Offices Branch	Consists of three (3) regional offices (Northern, Central, Southern). Responsible for enforcing federal and state laws and regulations pertaining to the proper and safe use of pesticides. Oversight responsibility for pesticide incident investigations and enforcement response to pesticide use violations. Conducts outreach, provides guidance to county regulators (CACs field enforcement employees), trains inspectors, and evaluates effectiveness of county pesticide use programs. Conducts the food safety program of collecting produce samples, delivery of samples to be analyzed by lab, and follow up on any illegal pesticide residues detected on produce. Performs Marketplace Surveillance Inspections at wholesale and retail locations in person and online to determine the registration status of pesticides being sold in California.
Environmental Monitoring Branch	Evaluates environmental and human health impacts of pesticide products to support DPR registration decisions. Monitors the environment to determine the fate of pesticides, analyzing potential hazards in air, soil, ground water, and surface water. Uses scientific data to develop pollution prevention strategies to protect public health and the environment from the potentially adverse effects of pesticides. Develops methods for collecting and analyzing environmental samples for pesticides and evaluates environmental data submitted by registrants. Provides environmental monitoring data required for eradication projects and assessments of environmental contamination and human exposure in support of continuous evaluation.
Human Health Assessment Branch	Conducts risk assessments including but not limited to the following activities: hazard identification, dose-response assessment, exposure assessment, and preparation of a risk characterization document that assesses potential dietary, workplace, residential, and ambient air exposures. Reviews the data for new active ingredients and new products containing currently registered active ingredients; label amendments on currently registered products; and reevaluation of currently registered active ingredients. Reviews toxicology data for adequacy and indications of possible adverse health effects. Assesses the adequacy of product data and the potential for adverse health effects in humans.

Organizational Unit	Profile
Integrated Pest Management Branch	Assesses the impacts and potential problems resulting from pesticide use, with a focus on preventive solutions that incorporate integrated pest management (IPM). Activities include but are not limited to facilitating adoption of IPM in schools, awarding grants to encourage development and use of alternatives to pesticides (Alliance Grants Program and Research Grants Program), and evaluating pest management practices. Includes the Pesticide Use Reporting (PUR) Program, which collects, reviews, and analyzes pesticide use data in California. Coordinates the Pesticide Management Advisory Committee (PMAC), a stakeholder committee, established to help the department in identifying, facilitating, and promoting environmentally sound pest management practices and pest management systems. PMAC's primary responsibility is assisting DPR in evaluating and selecting grants in DPR's Pest Management Grants Program.
Pesticide Evaluation Branch	Scientists with expertise in chemistry, microbiology, plant physiology, pest and disease prevention, ecotoxicology, or environmental fate review registrant submitted data to determine the effects of pesticide products on target pests and nontarget effects (effects on species not considered the target pest). Registration reviews identify potential adverse effects and provide registration recommendations. Provides scientific support for continuous evaluation of registered pesticides through review of data characterizing impacts to nontarget organisms (e.g., pollinators, mammals, birds, invertebrates). Develops mitigation to protect nontarget organisms.
Pesticide Registration Branch	Responsible for the registration of pesticide products and coordination of reevaluation. Coordinates the required scientific data evaluation to support registration among branches within the Pesticide Programs Division. Serves as primary liaison to companies applying to register their products (i.e., registrants). Prepares public notices and corresponds with registrants regarding data requirements, determinations of the health effects of pesticides, and final actions on registrations. Manages all data received, oversees call-ins of data on environmental fate and acute and chronic toxicology, maintains label files and the pesticide data library, and provides information on registered pesticides and label instructions to pesticide enforcement agencies and the public. Coordinates Pesticide Registration and Evaluation Committee (PREC) public meetings including stakeholders and other state agencies.
Worker Health and Safety Branch	Responsible for human safety (workers and the public) during and after pesticide use. Human Health Mitigation Program evaluates exposure and risk assessment to develop and implement mitigation measures that reduce the risk of worker and public exposure to pesticides. Pesticide Illness Surveillance Program (PISP) analyzes reports of potential pesticide-related illnesses, evaluates data for illness trends, and maintains a database of pesticide-related illnesses. Exposure Monitoring and Industrial Hygiene Program scientists design and conduct field research to characterize exposure to pesticides for use in exposure assessment and investigate unsafe work conditions detected by PISP. Conducts public and worker health outreach.

**Exhibit 1-7
Administration Profile**

Organizational Unit	Profile
Executive Office	Leads the department; responsible for DPR overall operations and management. Interacts with CalEPA, Governor’s Office, and Legislature. Responsible for public engagement, communication and outreach, legislation and policy, legal, and environmental justice.
Fiscal, Audits, & Business Services Branch	Collects revenues and pays invoices, monitors cash flow, develops and monitors DPR’s annual budget, assists program staff with contracting and purchasing, oversees asset management and conducts other business services; responsible for disbursing a percentage of mill assessment revenue to CACs to help support local pesticide enforcement; audits pesticide sellers throughout the state to ensure they comply with the sales reporting and mill assessment payments.
Human Resources Branch	Administers and oversees all personnel activities, including recruitment, examinations, hiring, labor relations, equal employment opportunity, diversity, equity and inclusion, employee engagement, employee health and job safety, benefits and payroll, training, professional development, operational and strategic planning workforce development and succession planning, administrative directives, employee recognition, and performance management.
Information Technology Branch	Operates under a centralized IT governance model; responsible for department-wide IT related activities such as network services, server and desktop support, application and database development, IT procurement, enterprise hardware software management and support, internal and external website design and administration, and information security. Works closely with CalEPA, CACs, and California Department of Technology (CDT) to lower costs, ensure compliance, and deliver our program functions through technology.

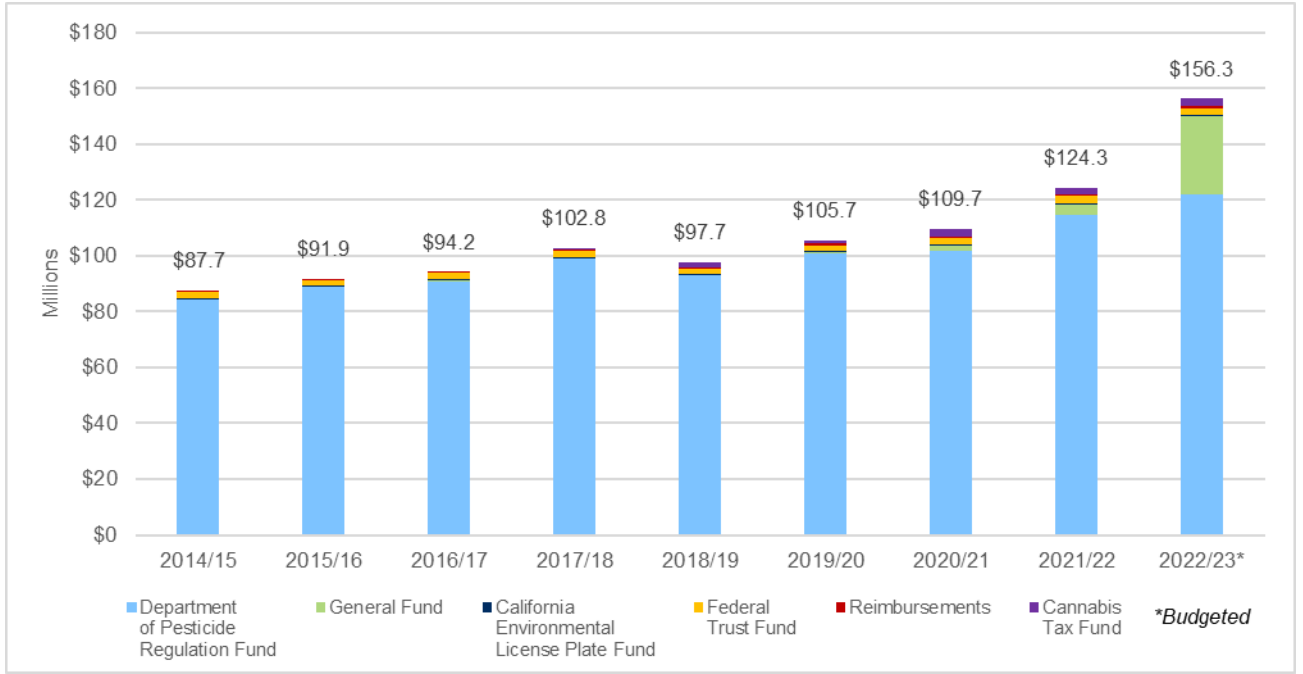
D. Funding Department of Pesticide Regulation’s Pesticide Programs and Administration

DPR’s Pesticide Programs and Administration are primarily funded by the Department of Pesticide Regulation Fund with limited funding from the General Fund, California Environmental License Plate Fund, Federal Trust Fund, Reimbursements, and Cannabis Tax Fund. In **Exhibit 1-8**, we profile each fund and in **Exhibit 1-9**, we provide DPR’s funding by source from FY2014/15 through FY2022/23. We further describe the current fiscal status of the Department of Pesticide Regulation Fund below.

Exhibit 1-8 Fund Profiles

Fund	Profile
Department of Pesticide Regulation Fund	Accounts for over 90 percent of DPR’s revenue in a typical year. Mill related revenues account for roughly 80 percent of the fund’s revenues and are budgeted to support DPR and CACs’ mill related responsibilities. Registration related revenues account for roughly 15 percent of the fund’s revenues and are budgeted to the department’s registration related responsibilities. Licensing and Certification related revenues account for roughly 5 percent of the fund’s revenues and are budgeted to support licensing and certification related responsibilities.
General Fund	Since FY2014/15, DPR received support from the General Fund in FY2016/17 (\$700,000), FY2019/20 (\$300,000), and FY2020/21 (\$1.9 million). In FY2021/22, DPR received one-time funding of \$29.0 million over two fiscal years to enhance existing scientific and grant programs, support environmental monitoring activities, support for the pesticide notification network, strengthen enforcement and community engagement activities, and examine the mill assessment through the Mill Assessment Study. In FY2022/23, DPR is budgeted to receive \$1.6 million to support the licensing and certification program and \$1.6 million to support technical assistance for extreme heat.
California Environmental License Plate Fund	Since FY2014/15, DPR has received roughly \$500,000, on average, per year from the California Environmental License Plate Fund to support a portion of the department’s surface water monitoring activities.
Federal Trust Fund	DPR receives funding from the U.S. Environmental Protection Agency (US EPA) to support an array of activities, including but not limited to ongoing worker protection, enforcement compliance, US EPA’s pesticide data program, water quality and other special projects. Since FY 2014/15, DPR has received roughly \$2.3 million, on average, per year from the US EPA.
Reimbursements	DPR is reimbursed by the Structural Pest Control Board (SPCB) to support expenditures related to enforcement activities and by CDFA for pest monitoring activities. Since FY2014/15, the DPR has received roughly \$400,000, on average, per year from reimbursements.
Cannabis Tax Fund	Since FY2018/19, the DPR has received funding from this fund to primarily support its cannabis related enforcement functions, including funding for local assistance and its regional offices. DPR has received roughly \$1.3 million, on average, per year from the CTF.

**Exhibit 1-9
Departmental Funding by Source⁹
FY2014/15 to FY2022/23**



⁹ Totals match DPR’s budget galley, which exclude \$3 million to \$10 million in expenditures (depending on year) related to fund users, pro rata, and supplemental pension obligations.

Status of the Department of Pesticide Regulation Fund

DPR is authorized to utilize the Department of Pesticide Regulation Fund to support its Pesticide Programs and Administration. As shown in **Exhibit 1-10**, the Department of Pesticide Regulation Fund has operated under a structural deficit (i.e., when actual expenditures are greater than revenues) in five out of eight years from FY2014/15 to FY2021/22. DPR projects the Department of Pesticide Regulation Fund will operate under a structural deficit in FY2022/23 (budgeted).

The Department of Pesticide Registration Fund's structural deficit is primarily driven by fluctuations in mill, registration, and licensing and certification programmatic related revenues and expenditures on a year-to-year basis, as shown in **Exhibit 1-11**. In FY2021/22, the fund's total expenditures increased roughly \$15.0 million from the prior fiscal year due to the following factors:

- Restoration of FY2020/21 budget cut to the fund balance (\$2.5 million)
- Pandemic related budget cuts restored (\$4.6 million)
- Initial CalPEST project funding (\$5 million)
- FY2021/22 employee compensation increase (\$3.3 million).

The fund's projected structural deficit in FY2021/22 and FY2022/23 is driven by mill, registration, and licensing and certification deficits. Below are additional highlights:

- **Mill Programmatic Revenues & Expenditures:** From FY2014/15 to FY2021/22 (estimated actuals), mill revenues and expenditures have increased approximately 4 percent, on average, on an annual basis. In FY2016/17 through FY2019/20, the fund's structural deficit was largely driven by mill related deficits. In FY2020/21, the fund's surplus was driven by an increase in mill revenues due to COVID-19 pandemic related pesticide sales of disinfectants and antimicrobials along with overall state directed budget cuts as a fiscal response to the pandemic. From FY2019/20 to FY2021/22 (estimated actuals), the department utilized mill revenues, on average, to support its Pesticide Programs and Administration (roughly 57%), CACs (roughly 35%), fund users (roughly 4%), and to support a share of the department's pro rata and supplemental pension obligations (roughly 4%).
- **Registration Programmatic Revenues & Expenditures:** From FY2014/15 to FY2021/22, registration revenues have increased approximately 11.5 percent, on average, on an annual basis and expenditures have increased approximately 12 percent on an annual basis. DPR increased registration fees in FY2015/16 and again in FY2021/22 to support registration related programmatic needs.
- **Licensing Programmatic Revenues & Expenditures:** From FY2014/15 to FY2021/22 (estimated actuals), licensing and certification revenues decreased approximately 2 percent, on average, on an annual basis and expenditures increased approximately 9.6 percent on an annual basis. As part of DPR's FY2022/23 budget, the department received 3.0 permanent positions supported by \$1.6 million from the General Fund in FY2022/23 through FY2024/25, and \$1.3 million going forward. These positions address and implement necessary Licensing and Certification Program responsibilities required by unfunded federal mandates¹⁰ issued in 2017, and to modernize elements of the licensing system. DPR is planning to propose regulations to increase licensing and certification fees to support associated unfunded responsibilities. Licensing fees were last raised in 2004.

¹⁰ Federal Certification of Pesticide Applicators Rule.

Exhibit 1-10
Department of Pesticide Regulation Fund
FY2014/15 through FY2022/23



Exhibit 1-11
Comparison of Mill, Registration, and Licensing & Certification Revenues and Expenditures
FY2014/15 through FY2022/23



2. Methodology

In this section, we first discuss our approach to examining DPR's current programmatic needs. We then discuss our approach to determine DPR's future programmatic needs based on our workload analysis results presented in *Section 4*. We conclude this section by describing how we prepared the estimated mill funding implication results presented in *Section 5*. This section is organized as follows:

- A. *Examination of Current Programmatic Needs*
- B. *Determination of Future Programmatic Needs*
- C. *Estimation of Mill Funding Implications.*

A. Examination of Current Programmatic Needs

An objective of the Mill Assessment Study is to examine DPR's *current* funding needs associated with its mill-related responsibilities. To meet this objective, Crowe conducted initial interviews, programmatic research, and detailed analysis to identify, understand, and examine DPR's current programmatic needs. Below is a description of what we mean by current programmatic needs:

- **Current programmatic needs:** reflect the department's FY2022/23 personal service related expenditures anticipated to be supported by mill revenues;¹¹ for the purposes of this analysis, we assume these expenditures will continue to be supported by the mill given they have already been approved by the Legislature through the annual budgeting process; current programmatic needs may require additional mill revenues depending on the extent to which mill revenue generated from pesticide sales aligns with increased costs.

Subject Matter Expert Interviews

Crowe interviewed fourteen (14) of DPR's subject matter experts (SMEs) at the beginning of the study process to identify and understand the department's programmatic needs related to carrying out its mission, mandates, and Pesticide Programs and Administration related functions. The purpose of these initial interviews was to gain a comprehensive understanding of the department's various branches and offices to understand potential future programmatic needs to continue to meet DPR's mission while meeting emerging pressures from additional workload. The initial SME interviews included the following groups:

- Enforcement Headquarters Branch
- Enforcement Regional Offices Branch
- Environmental Monitoring Branch
- Executive Office
- Fiscal, Audits, and Business Services Unit
- Human Health Assessment Branch
- Human Resources Branch
- Information Technology Branch
- Integrated Pest Management Branch
- Mill Office
- Pesticide Evaluation Branch
- Pesticide Registration Branch
- Worker Health and Safety Branch.

After the initial round of interviews, Crowe continued to meet with SMEs listed above and other representatives within the groups listed above throughout Summer and Fall 2022 to further identify DPR's overall programmatic needs with a focus on the identification of unbudgeted core and sustainable pest management (SPM) related workload. We provide additional details on what we mean by core and SPM related workload in the next subsection.

¹¹ Based on FY2022/23 authorized positions and personal services expenditures.

Program Research

Crowe also performed comprehensive program research to understand and identify the various programmatic and fiscal data elements that could aid in our examination of DPR's current programmatic needs. Specifically, we reviewed and assessed the following:

- *Funding Environmental Regulation*, report by the Legislative Analyst Office (1995)
- *Funding California's Pesticide Regulatory Program*, report to the Legislature (2003)
- Documentation on the department's function-based accounting methodology¹², including descriptions of key Pesticide Programs and Administration related functions and activities
- Authorized positions, including limited term and vacant positions, from FY2014/15 through FY2022/23
- Authorized and actual department-wide revenues and expenditures from FY2014/15 through FY2022/23
- Authorized and actual Department of Pesticide Regulation Fund related revenues and expenditures from FY2014/15 through FY2022/23, including:
 - Mill related authorized and actual revenues and expenditures for mill related workload from FY2014/15 through FY2022/23
 - Registration related authorized and actual revenues and expenditures for mill related workload from FY2014/15 through FY2022/23
 - Licensing and certification related authorized and actual revenues and expenditures for mill related workload from FY2014/15 through FY2022/23
- Budget change proposals (BCPs) over the past four (4) fiscal years and supporting workpapers
- FY2022/23 authorized budgetary details, including personal services, and operating and equipment expenditures (OEE) related expenditures for the department's organizational units.

Together, the SME interviews along with program research, provided a foundation for Crowe's examination of DPR's current programmatic needs, which are summarized in *Section 3* of this report.

¹² Function-based accounting focuses on the costs and performance of specific program functions rather than those of organizational units.

B. Determination of Future Programmatic Needs

In addition to examining DPR's current programmatic needs, an objective of the Mill Assessment Study is to also examine DPR's *future* funding needs associated with its mill-related responsibilities. To meet this objective, Crowe conducted a workload study, in coordination with DPR, to confirm DPR's current programmatic needs along with its future programmatic needs to continue to meet its mission and ongoing obligations. Future programmatic needs include anticipated programmatic needs associated with implementing the SPM Roadmap. Crowe identified unbudgeted core and SPM programmatic needs, including existing gaps and/or inefficiencies, that are putting pressure on DPR's existing resources. DPR's future programmatic needs reflect additional resources that the department needs to fulfill its mission. We categorize DPR's future programmatic needs into two (2) groups: unbudgeted core programmatic needs and unbudgeted SPM programmatic needs, defined below. These two categories provide useful distinctions for discussion purposes. It is important to note that there are overlaps between the two categories and that some positions and activities fit within both.

- **Unbudgeted core programmatic needs:** account for the department's existing unbudgeted "core" workload and indicate potential mill revenue or revenue from other sources are needed to support the unbudgeted workload for ongoing program obligations.
- **Unbudgeted SPM programmatic needs:** account for the department's preliminary evaluation of SPM Roadmap¹³ related workload and indicates potential mill revenue or revenue from other sources needed to support the unfunded workload. In some cases, SPM-related work overlaps with existing programmatic activities. The unbudgeted SPM programmatic needs identified in this section represent an initial subset of SPM-related activities aligned with DPR's existing mandates.

Crowe performed the following to conduct our workload analysis:

- **Confirmation of current programmatic needs:** confirmed key workload activities performed by DPR's FY2022/23 authorized positions (including anticipated workload to be performed by vacant positions); it is important to note that we assumed each authorized position was fully utilized; we present DPR's current programmatic needs in *Section 3* of this report.
- **Identification of unbudgeted core programmatic needs:** in coordination with DPR's SMEs, identified additional workload activities and appropriate position classifications needed in addition to current programmatic needs to meet ongoing programmatic obligations.
- **Identification of unbudgeted SPM programmatic needs:** in coordination with DPR's SMEs, identified additional workload activities and appropriate position classifications needed for initial implementation of the SPM Roadmap.
- **Calculated funding needs based on workload analysis:** calculated DPR's funding needs to support the department's future programmatic needs. Specifically, we calculated fully loaded amounts for each additional position identified as a result of the workload analysis. The fully loaded amount for each position includes position classification FY2022/23 average annual salary (we provide salary ranges in *Appendix D*), benefits (roughly 52% of annual salary), and operating and equipment expenditures costs (\$27,000 per position). For example, an Environmental Scientist position's fully loaded amount equates to roughly \$172,000, as detailed below:
 - Average monthly salary (\$7,926.00) x 12 = \$95,112.00 annual salary
 - Annual salary x 0.52 = \$49,458.00 benefits
 - Operating and equipment expenditures (OEE) costs = \$27,000.

¹³ The SPM Roadmap, released in January 2023, was prepared by the SPM Work Group, which includes 33 members from diverse backgrounds, including growers and other representatives from the agricultural industry, university researchers, government representatives, and community representatives who bring environmental, social justice, farm worker and Tribal perspectives. The SPM Roadmap outlines recommended goals and actions to advance both agriculture and urban SPM.

- **Calculated “roll-up” of total unbudgeted core and SPM programmatic needs:** calculated DPR’s total unbudgeted needs by rolling up amounts identified within each organizational unit. We provide the results of this calculation along with calculations for DPR’s Pesticide Programs and Administration within *Section 4* of this report.

C. Estimation of Mill Funding Implications

The confirmation of DPR’s current programmatic needs along with the identification of its future programmatic needs provided the basis for estimating mill funding implications presented in *Section 5* of this report. Crowe performed the following to calculate estimated mill funding implications:

- **Examined DPR’s current programmatic needs for mill related responsibilities:** evaluated and confirmed DPR’s FY2014/15 through FY2021/22 actual expenditures for its mill related responsibilities; Crowe examined DPR’s methodology for allocating expenditures to mill programmatic functions and found the department’s approach to be appropriate based on our examination of the department’s current workload activities and associated programmatic needs.
- **Allocated DPR’s future programmatic needs by appropriate funding source:** allocated DPR’s future programmatic needs to an appropriate funding source (e.g., mill, registration, licensing & certification, or indirect) based on the following criteria:
 - Mill related programmatic functions categorized to mill funding, including programmatic functions associated with implementation of the SPM Roadmap
 - Registration related programmatic functions categorized to registration funding
 - Licensing and Certification related programmatic functions categorized to licensing and certification funding
 - Administrative programmatic functions allocated across mill, registration, and licensing & certification funding.
- **Calculated estimated revenue requirements and mill rates:** calculated estimated revenue required to support DPR’s current and future programmatic needs assuming FY2021/22 pesticide sales and FY2022/23 budgeted expenditures of its mill related responsibilities. We provide the results of this calculation in *Section 5*. As described in *Section 5*, these estimates do not include potential *additional* funding needs for CACs, CDFA, a reserve, or other potential needs.

3. Current Programmatic Needs

In this section, we summarize DPR's current programmatic needs for its Pesticide Programs and Administration. The intention to provide this level of detail is to clearly present DPR's current programmatic needs reflected within its FY2022/23 budget for authorized positions that perform mill related responsibilities. In *Section 4*, we provide the results of our workload analysis, which identifies DPR's future programmatic needs, including those associated with implementation of the SPM Roadmap. Subsequently, in *Section 5*, we provide estimated mill revenue required to support DPR's current programmatic needs reflected in this section along with its future programmatic needs reflected in *Section 4*. This section is organized as follows:

- A. *Summary of DPR's Current Programmatic Needs*
- B. *Pesticide Programs Current Programmatic Needs*
- C. *Administration Current Programmatic Needs.*

A. Summary of DPR's Current Programmatic Needs

DPR's current programmatic needs reflected in its FY2022/23 budget include 333.2 authorized positions to perform Pesticide Program related functions and 106.6 authorized positions to perform Administration related functions. DPR's FY2022/23 authorized personal services expenditures (i.e., support for authorized positions, including annual salaries and benefits) total roughly \$72.3 million, which includes \$55.4 million budgeted for its Pesticide Programs and approximately \$16.9 million budgeted for its Administration, as shown in **Exhibit 3-1**. Roughly 75 percent of DPR's FY2022/23 authorized positions are budgeted to perform Pesticide Program related functions and 25 percent to perform Administration related functions.

The Department of Pesticide Regulation Fund supports \$69.8 million or roughly 97 percent of the department's current programmatic needs. The General Fund, California Environmental License Plate Fund, and Cannabis Control Fund supports \$2.5 million or roughly 3 percent of the department's current programmatic needs. **Exhibit 3-2** illustrates the Department of Pesticide Regulation Fund's predominant role in supporting the department's current programmatic needs. Below is a breakdown of the funding source allocation for DPR's Pesticide Programs and Administration:

- **Pesticide Programs:** \$55.4 million budgeted for FY2022/23 personal services related expenditures are supported by the Department of Pesticide Regulation Fund (\$53.2 million or 96 percent), General Fund (\$0.3 million or less than one percent), California Environmental License Plate Fund (\$916,000 or 2 percent), and the Cannabis Control Fund (\$950,000 or 2 percent).
- **Administration:** \$16.9 million budgeted for FY2022/23 personal services related expenditures are supported by the Department of Pesticide Regulation Fund (\$16.6 million or 98 percent) and Cannabis Control Fund (\$290,000 or 2 percent).

Of the \$69.8 million supported by the Department of Pesticide Regulation Fund, the department estimates that roughly \$47.1 million or 67 percent is supported by mill revenues, \$19.7 million or 28 percent by registration revenues, and \$3.1 million or 4 percent by licensing and certification revenues, as illustrated in **Exhibit 3-3**.

The Department's distribution of programmatic functions, shown in **Exhibit 3-4**, indicate the following allocations in order of largest to smallest: Pesticide Registration (29%), Monitoring and Surveillance: (15%), Enforcement (14%), Human Health and Environmental Assessment (9%), Mitigation of Human Health Risks (8%), Mitigation of Environmental Health Risks (8%), Licensing and Certification (6%), Pest Management (5%), Mill Assessment (4%), and Pesticide Use Reporting (2%).

Exhibit 3-1
FY2022/23 Authorized Personal Services Expenditures – Pesticide Programs and Administration

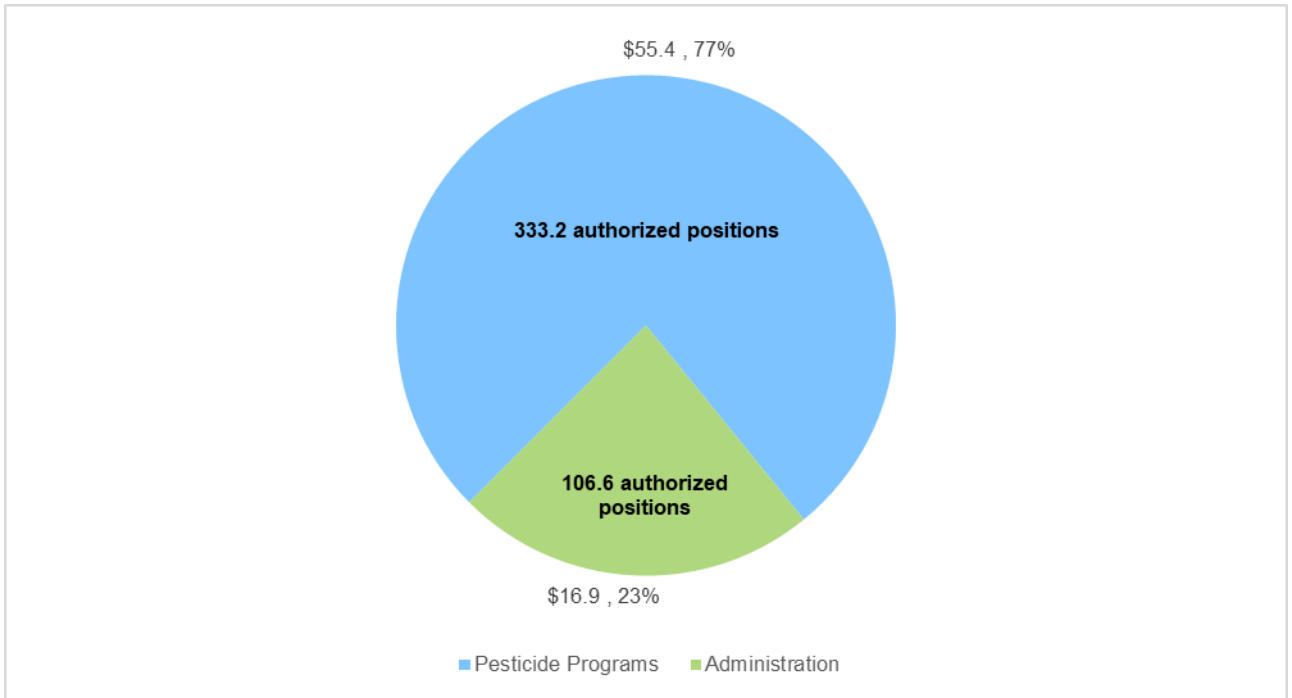


Exhibit 3-2
FY2022/23 Authorized Personal Services Expenditures – Departmental Funding Sources

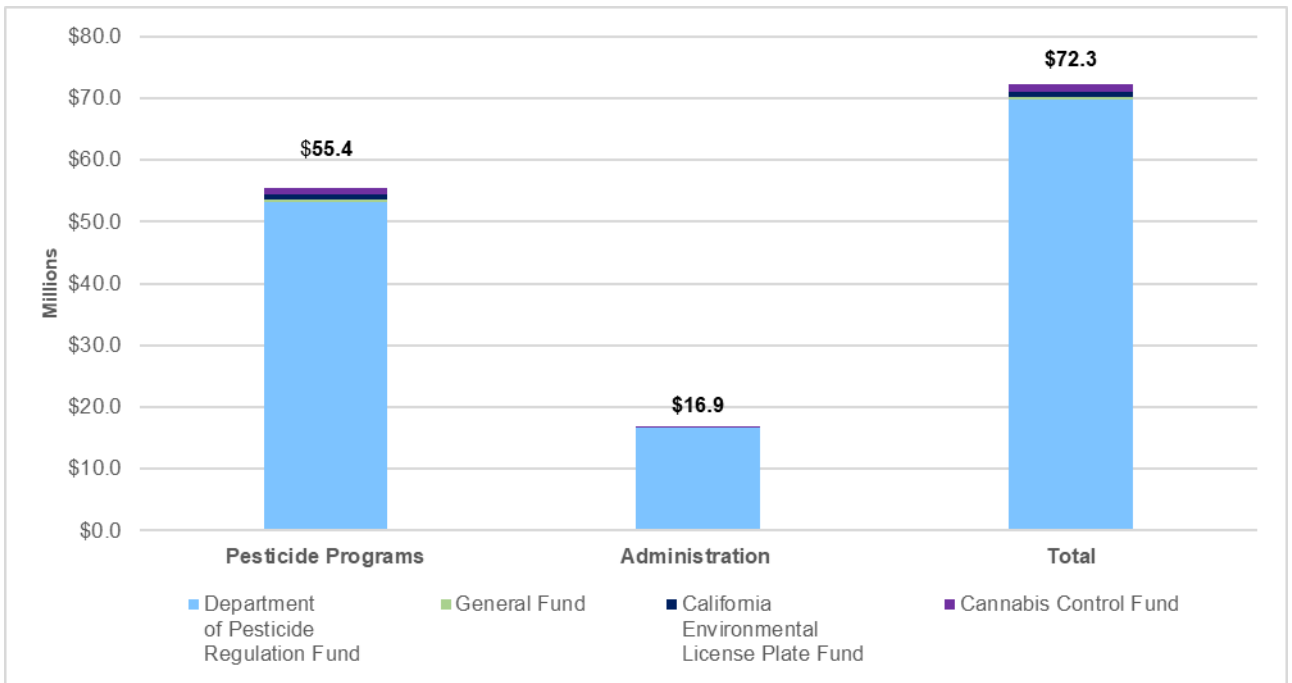


Exhibit 3-3
FY2022/23 Authorized Personal Services Expenditures
Department of Pesticide Regulation Fund

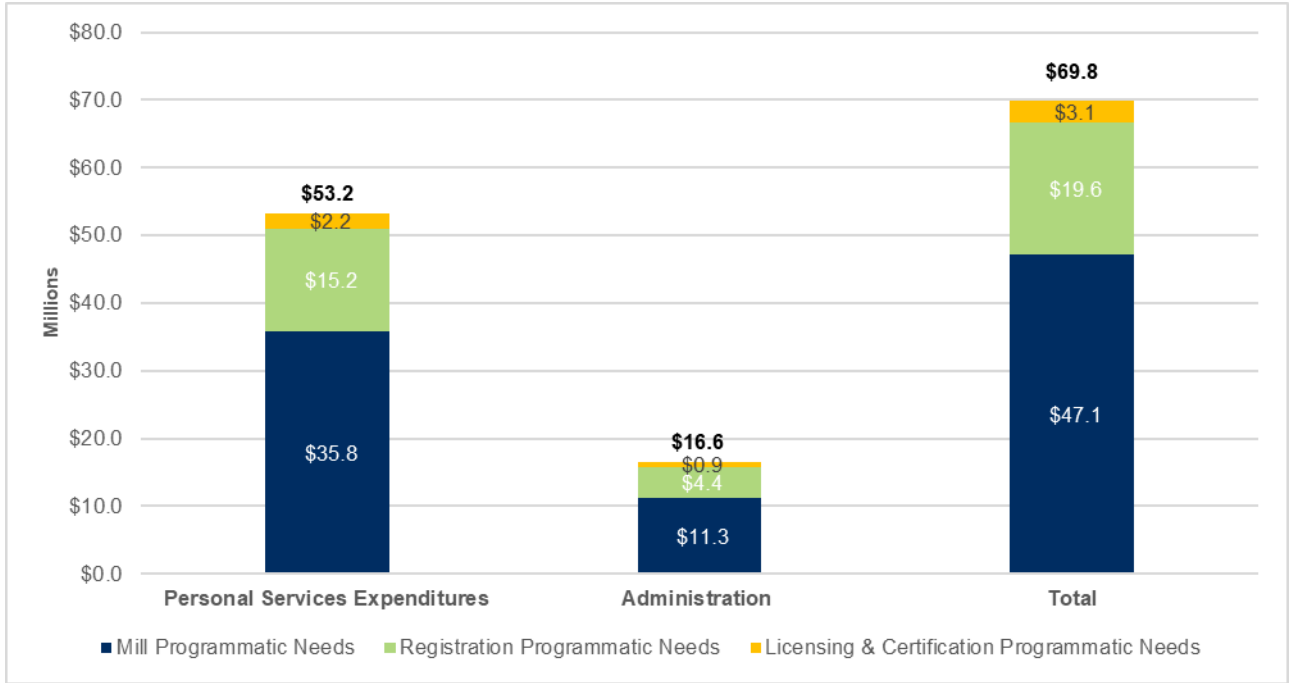
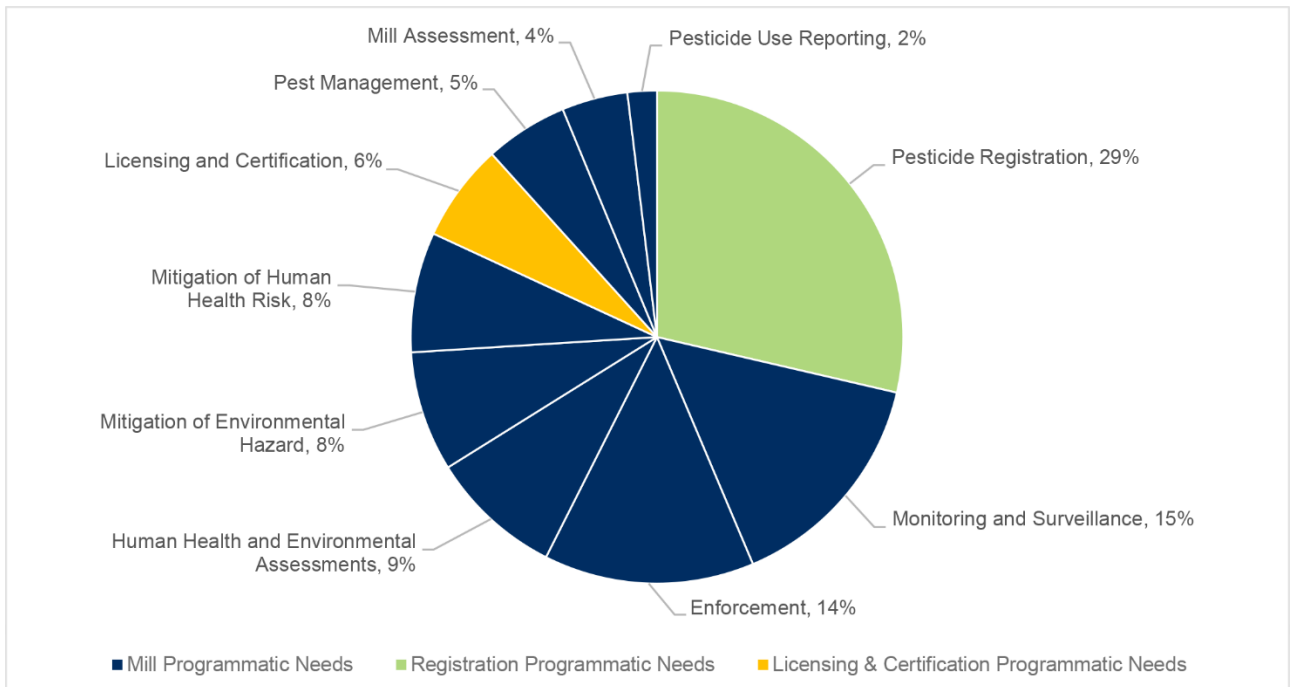


Exhibit 3-4
FY2022/23 Distribution of Functions – Pesticide Programs and Administration



B. Pesticide Programs Current Programmatic Needs

In this subsection, we describe DPR’s Pesticide Programs current programmatic needs, including authorized positions, funding, and functions. We provide a detailed breakdown of key workload activities performed by branch within DPR’s Pesticide Programs in *Appendix C*.

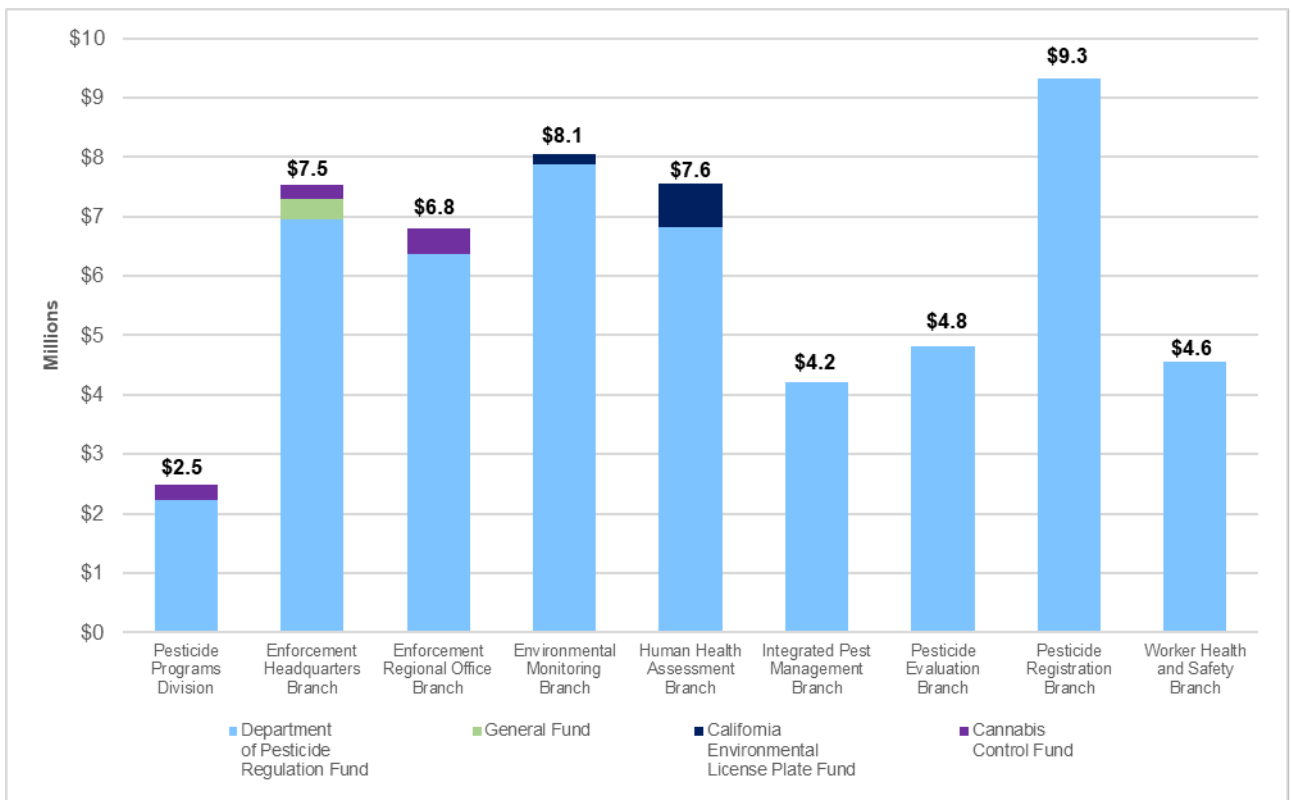
In total, DPR’s FY2022/23 budget for its Pesticide Programs includes 332.2 authorized positions totaling \$55.4 million. **Exhibit 3-5** provides a summary of authorized positions and personal services expenditures for each organizational unit. DPR’s Pesticide Registration Branch is the department’s largest organizational unit within its Pesticide Programs.

Exhibit 3-5
FY2022/23 Authorized Positions and Personal Services Expenditures – Pesticide Programs

Organizational Unit	Authorized Positions	Personal Services Expenditures (in millions)
Pesticide Programs Division	12.3	\$2.5
Enforcement Headquarters Branch	49.9	7.5
Enforcement Regional Offices Branch	42.9	6.8
Environmental Monitoring Branch	50.4	8.1
Human Health Assessment Branch	35.6	7.6
Integrated Pest Management Branch	25.1	4.2
Pesticide Evaluation Branch	27.0	4.8
Pesticide Registration Branch	61.4	9.3
Worker Health and Safety Branch	27.6	4.6
Pesticide Programs Total	332.2	\$55.4

Exhibit 3-6 illustrates the current funding sources for each branch within the DPR’s Pesticide Programs. The Department of Pesticide Regulation Fund is the primary funding source for DPR’s branches that carry out its Pesticide Programs functions. The Enforcement Headquarters Branch is the only branch currently supported by the General Fund. The Pesticide Programs Division, Enforcement Headquarters Branch, and Enforcement Regional Office Branch have limited support from the Cannabis Control Fund. The Environmental Monitoring Branch and the Human Health Assessment Branch have limited support from the California Environmental License Plate Fund. Within the subsections below, we refer to this Exhibit to describe the functions performed along with the estimated mill, registration, and licensing and certification revenues required to support each Branch.

Exhibit 3-6
FY2022/23 Funding Sources – Pesticide Programs
Personal Services Expenditures (in millions)

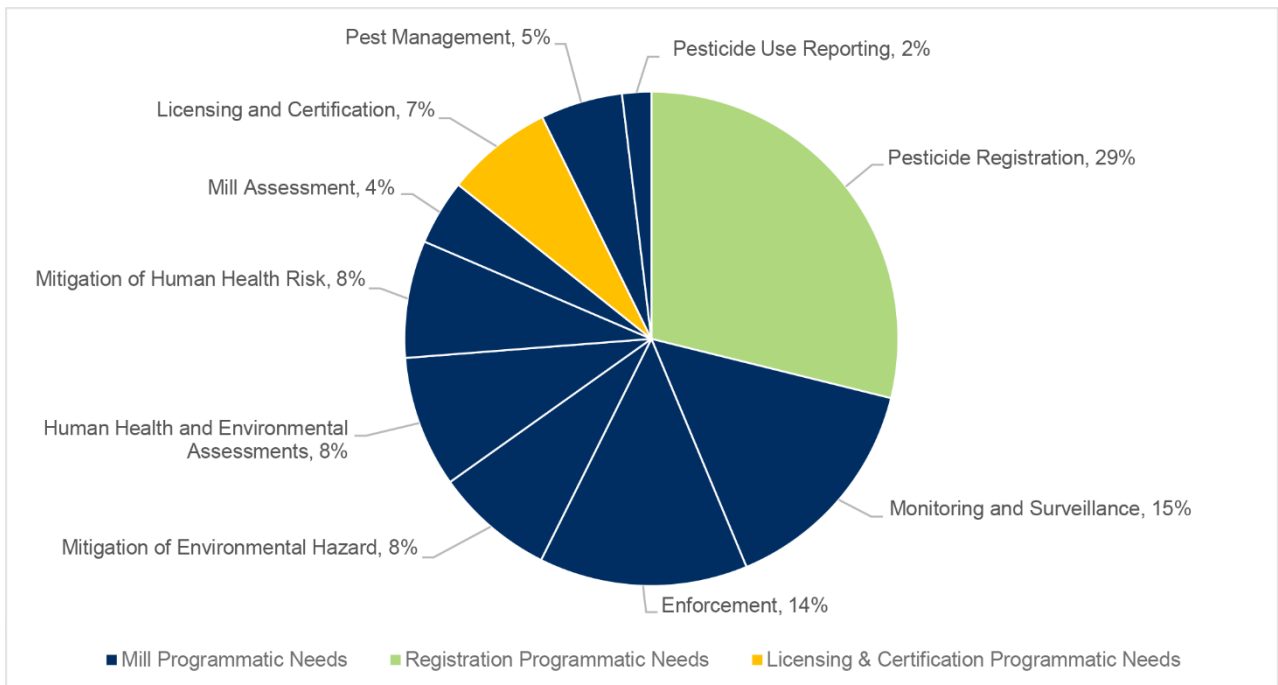


Pesticide Programs Division

DPR's FY2022/23 budget includes 12.3 authorized positions totaling \$2.5 million in personal services expenditures within the Pesticide Programs Division, which accounts for approximately 5 percent of the department's Pesticide Programs related personal services expenditures. As shown in Exhibit 3-6, the Pesticide Programs Division is supported by the Department of Pesticide Regulation Fund (\$2.2 million or 88 percent) and the Cannabis Control Fund (\$300,000 or 12 percent).

Of the \$2.2 million supported by the Department of Pesticide Regulation Fund, roughly \$1.5 million or 66 percent is supported by mill revenues, \$640,000 or 29 percent is supported by pesticide registration revenues, and roughly \$160,000 or 7 percent is supported by licensing and certification revenues, as illustrated in **Exhibit 3-7**. The Pesticide Programs Division's budgeted functions include the following: Pesticide Registration (29%), Monitoring and Surveillance (15%), Enforcement (14%), Mitigation of Environmental Hazards (8%), Human Health & Environmental Assessment (8%), Mitigation of Human Health Risks (7%), Mill Assessment (4%), Licensing and Certification (7%), Pest Management (5%), and Pesticide Use Reporting (2%).

Exhibit 3-7
FY2022/23 Distribution of Functions – Pesticide Programs Division



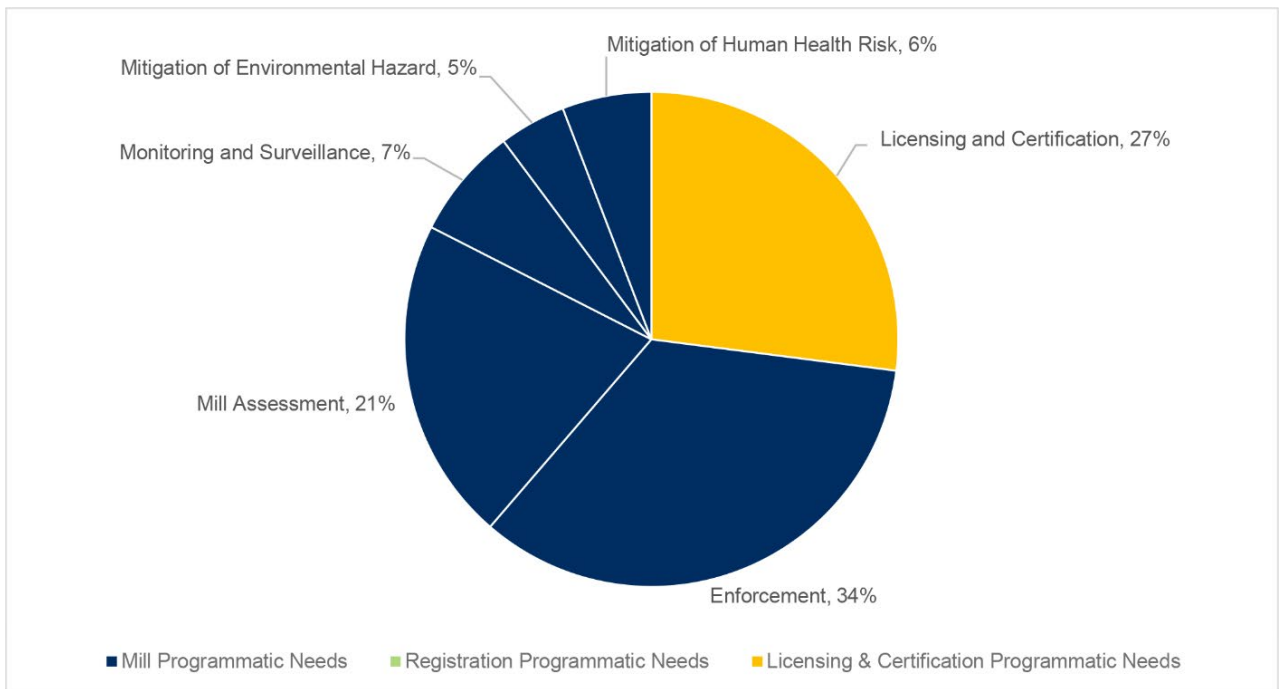
Enforcement Headquarters Branch

DPR's FY2022/23 budget includes 49.9 authorized positions totaling \$7.5 million in personal services expenditures within the Enforcement Headquarters Branch, which accounts for approximately 14 percent of the department's Pesticide Programs related personal services expenditures. Of the \$7.5 million, roughly \$2.0 million is budgeted for the Licensing & Certification Section, which is funded primarily by revenues generated from licensing and certification related fees.

As shown in Exhibit 3-6, the Enforcement Headquarters Branch is supported by the following: Department of Pesticide Regulation Fund (\$6.9 million or 92 percent), General Fund (\$300,000 or 5 percent), and Cannabis Control Fund (\$200,000 or 3 percent).

Of the \$6.9 million supported by the Department of Pesticide Regulation Fund, roughly \$4.9 million or roughly 70 percent is supported by mill revenues and \$2.0 million or roughly 30 percent is supported by licensing and certification revenues, as illustrated in **Exhibit 3-8**. The Enforcement Headquarters Branch's budgeted functions include the following: Licensing & Certification (27%), Enforcement (34%), Mill Assessment (21%), Monitoring & Surveillance (7%), Mitigation of Environmental Hazards (5%), and Mitigation of Human Health Risks (6%).

Exhibit 3-8
FY2022/23 Distribution of Functions – Enforcement Headquarters Branch



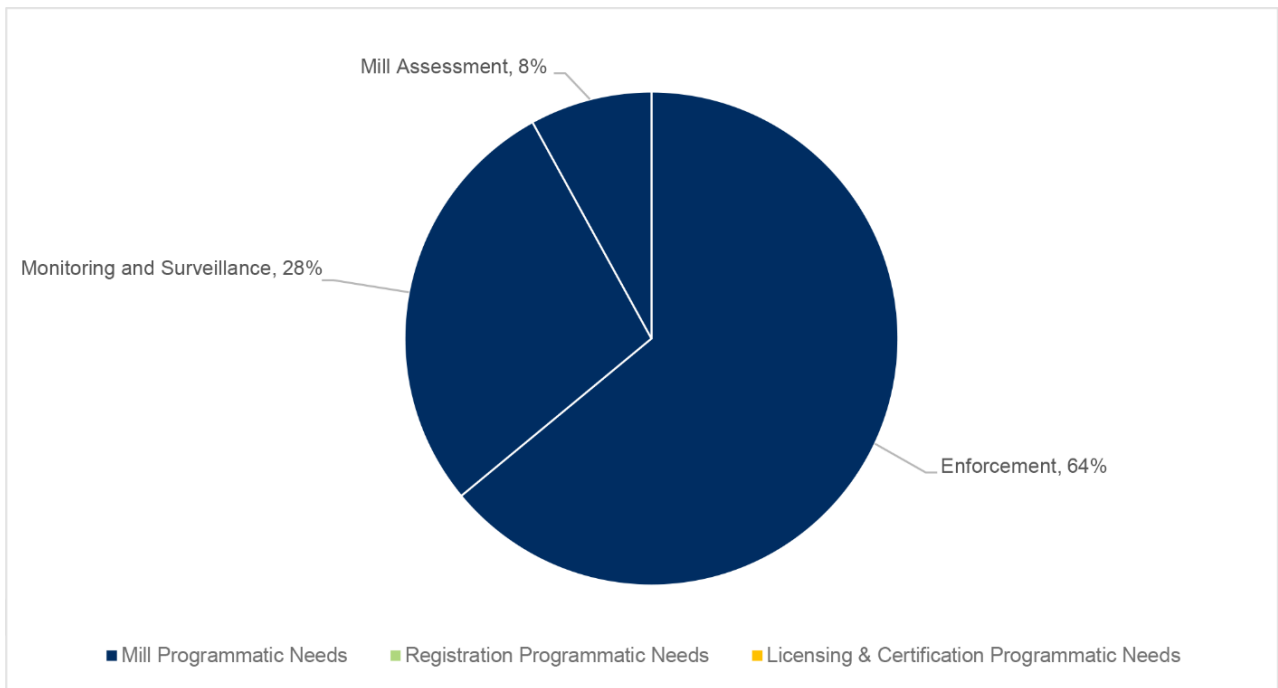
Enforcement Regional Offices Branch

DPR's FY2022/23 budget includes 42.9 authorized positions totaling \$6.8 million in personal services expenditures within the Enforcement Regional Offices Branch, which accounts for approximately 12 percent of the department's Pesticide Programs Related personal services expenditures.

As shown in Exhibit 3-6, the Enforcement Regional Offices Branch is supported by the Department of Pesticide Regulation Fund (\$6.4 million or 94 percent) and Cannabis Control Fund (\$400,000 or 6 percent).

Of the \$6.4 million supported by the Department of Pesticide Regulation Fund, 100 percent is supported by mill revenues, as illustrated in **Exhibit 3-9**. The Enforcement Regional Offices Branch's budgeted functions include the following: Enforcement (64%), Monitoring & Surveillance (28%), and Mill Assessment (8%).

Exhibit 3-9
FY2022/23 Distribution of Functions – Enforcement Regional Offices Branch

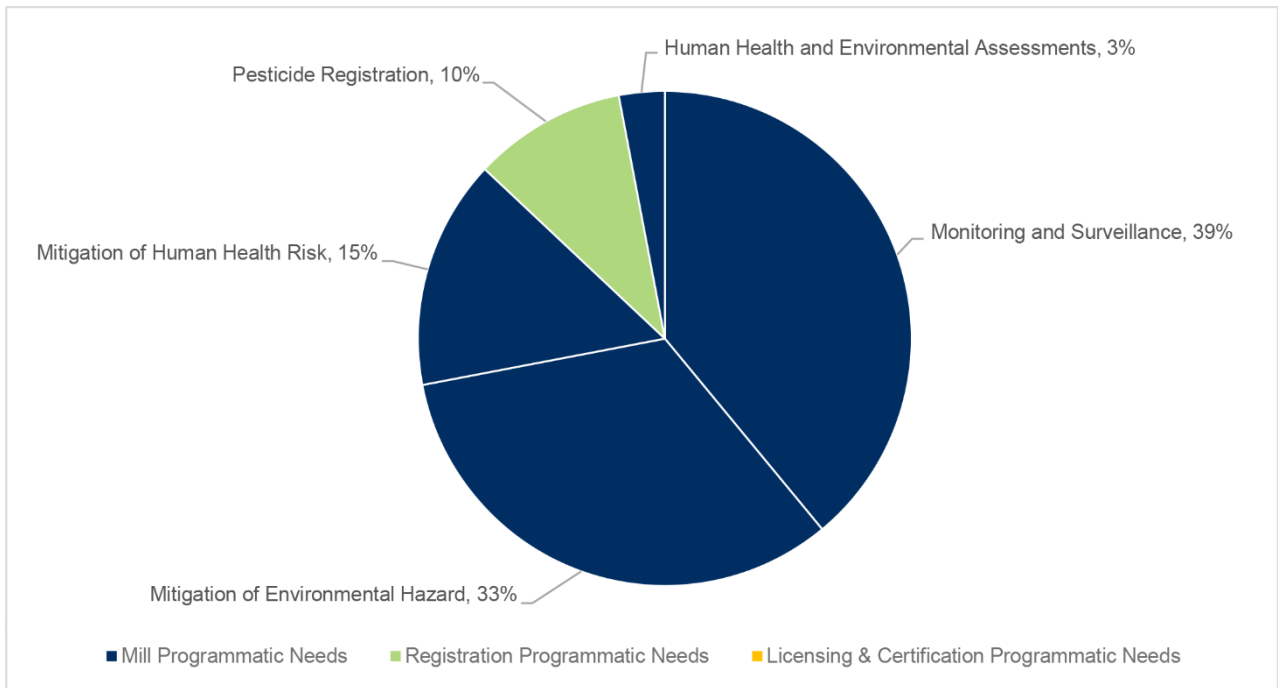


Environmental Monitoring Branch

DPR's FY2022/23 budget includes 50.4 authorized positions totaling \$8.1 million in personal services expenditures within the Environmental Monitoring Branch, which accounts for approximately 15 percent of the department's Pesticide Programs related personal services expenditures. As shown in Exhibit 3-6, the Environmental Monitoring Branch is supported by the Department of Pesticide Regulation Fund (\$7.9 million or 98 percent) and the California Environmental License Plate Fund (\$200,000 or 2 percent).

Of the \$7.9 million supported by the Department of Pesticide Regulation Fund, roughly \$7.1 million or 90 percent is supported by mill revenues and \$0.8 million or 10 percent is supported by pesticide registration revenues, as illustrated in **Exhibit 3-10**. The Environmental Monitoring Branch's budgeted functions include: Monitoring & Surveillance (39%), Mitigation of Environmental Hazards (33%), Mitigation of Human Health Risks (15%), Pesticide Registration (10%), and Human Health & Environmental Assessment (3%).

Exhibit 3-10
FY2022/23 Distribution of Functions – Environmental Monitoring Branch

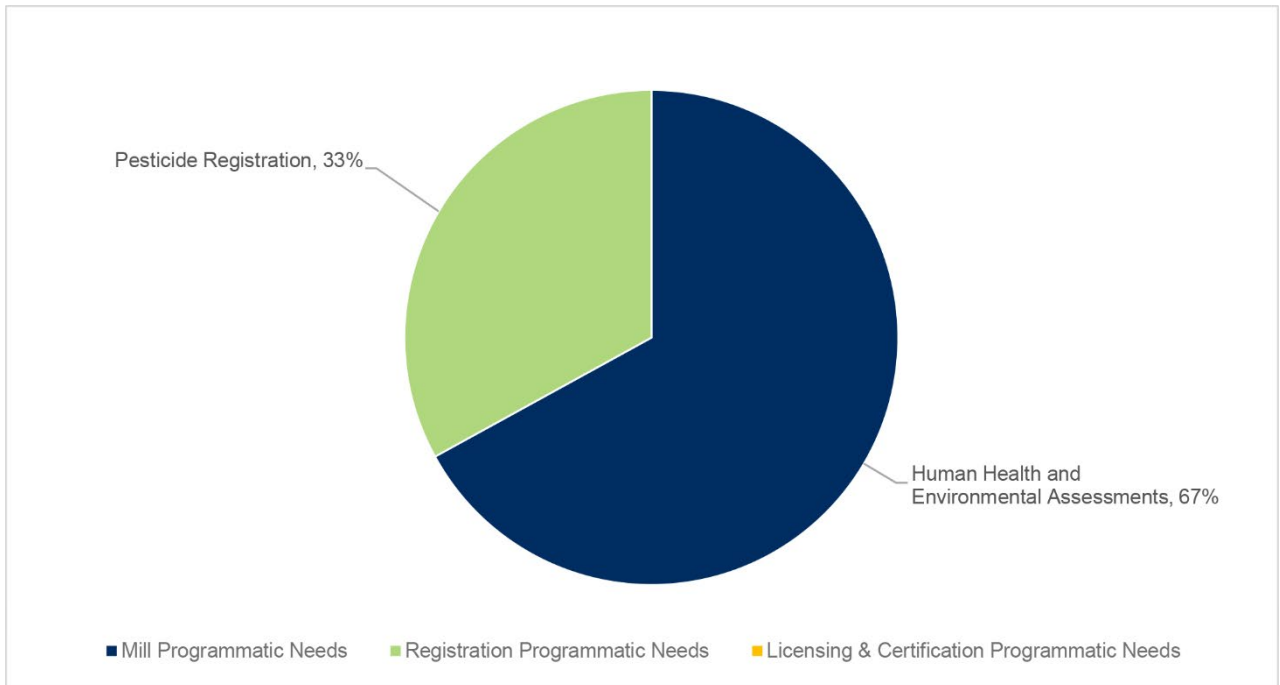


Human Health Assessment Branch

DPR's FY2022/23 budget includes 35.6 authorized positions totaling \$7.6 million in personal services expenditures within the Human Health Assessment Branch, which accounts for approximately 14 percent of the department's Pesticide Programs related personal services expenditures. As shown in Exhibit 3-6, the Human Health Assessment Branch is supported by the Department of Pesticide Regulation Fund (\$6.8 million or 90 percent) and California Environmental License Plate Fund (\$700,000 or 10 percent).

Of the \$6.8 million supported by the Department of Pesticide Regulation Fund, roughly \$4.6 million or 67 percent is supported by mill revenues and \$2.2 million or 33 percent is supported by pesticide registration revenues, as illustrated in **Exhibit 3-11**. The Human Health Assessment Branch's budgeted functions include the following: Human Health & Environmental Assessment (67%) and Pesticide Registration (33%).

Exhibit 3-11
FY2022/23 Distribution of Functions – Human Health Assessment Branch

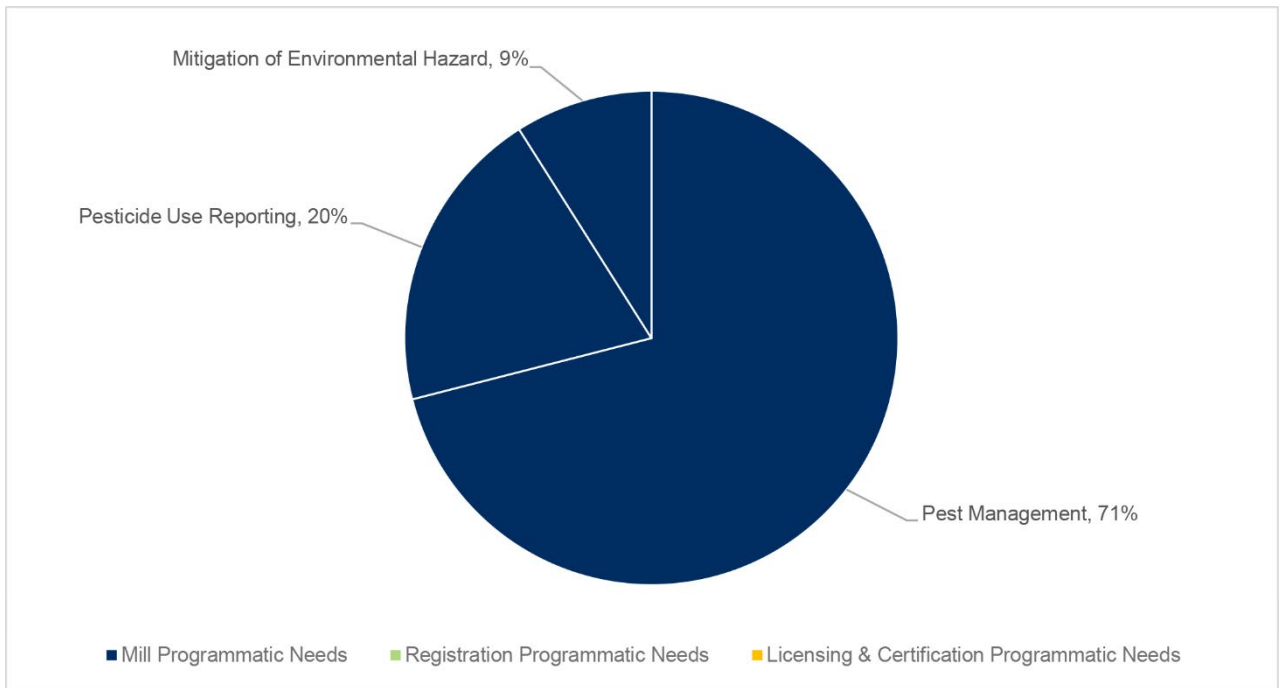


Integrated Pest Management Branch

DPR's FY2022/23 budget includes 25.1 authorized positions totaling \$4.2 million in personal services expenditures within the Integrated Pest Management Branch, which accounts for approximately 8 percent of the department's Pesticide Programs related personal services expenditures. As shown in Exhibit 3-6, the Integrated Pest Management Branch is 100 percent supported by the Department of Pesticide Regulation Fund.

Of the \$4.2 million supported by the Department of Pesticide Regulation Fund, 100 percent is supported by mill revenues, as illustrated in **Exhibit 3-12**. The Integrated Pest Management Branch's budgeted functions include the following: Pest Management (71%), Pesticide Use Reporting (20%), and Mitigation of Environmental Hazards (9%).

Exhibit 3-12
FY2022/23 Distribution of Functions – Integrated Pest Management Branch

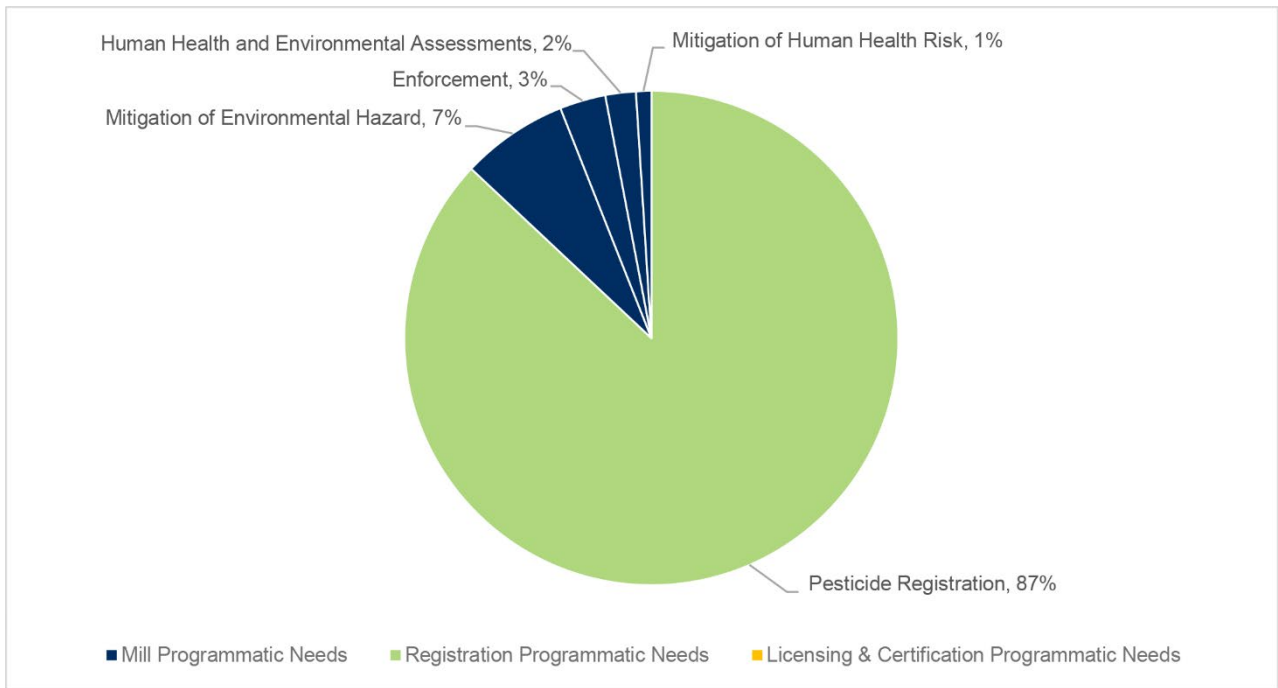


Pesticide Evaluation Branch

DPR's FY2022/23 budget includes 27.0 authorized positions totaling \$4.8 million in personal services expenditures within the Pesticide Evaluation Branch, which accounts for approximately 9 percent of the department's Pesticide Programs related personal services expenditures. As shown in Exhibit 3-6, the Pesticide Evaluation Branch is supported 100 percent by the Department of Pesticide Regulation Fund.

Of the \$4.8 million supported by the Department of Pesticide Regulation Fund, roughly \$620,000 or 13 percent is supported by mill revenues and \$4.2 million or 87 percent is supported by pesticide registration revenues, as illustrated in **Exhibit 3-13**. The Pesticide Evaluation Branch's budgeted functions include: Pesticide Registration (87%), Mitigation of Environmental Hazards (7%), Enforcement (3%), Human Health & Environmental Assessment (2%), and Mitigation of Human Health Risks (1%).

Exhibit 3-13
FY2022/23 Distribution of Functions – Pesticide Evaluation Branch

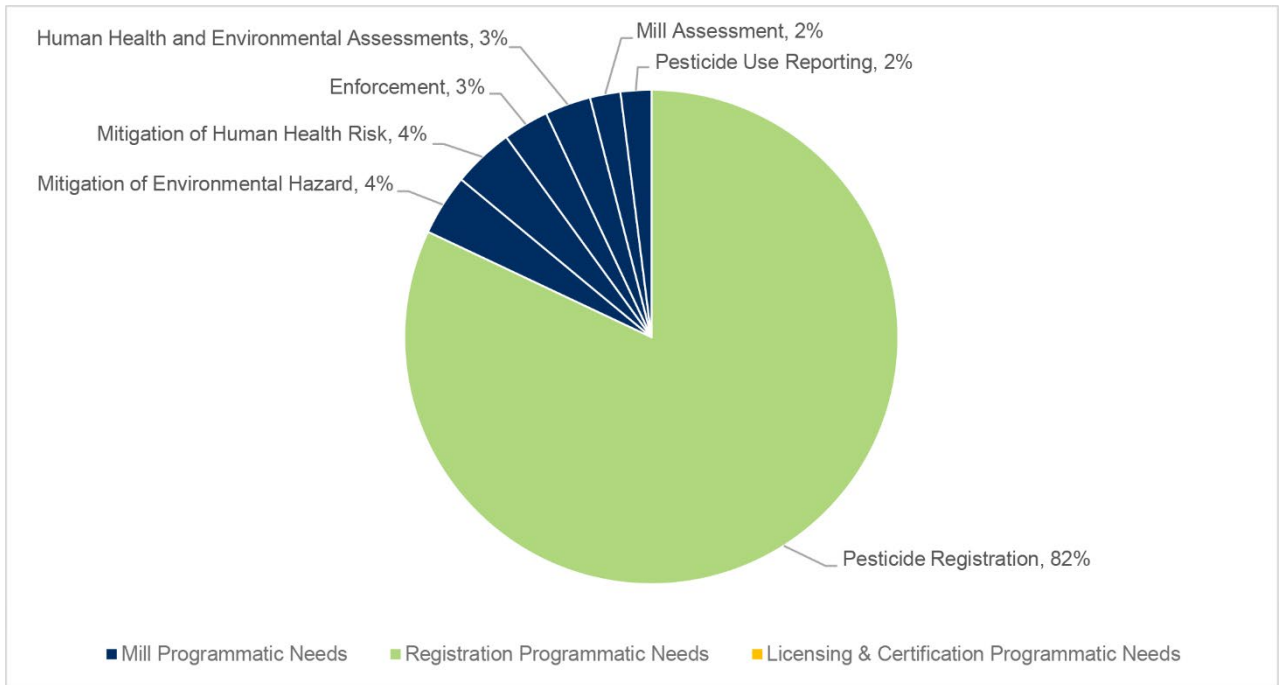


Pesticide Registration Branch

DPR's FY2022/23 budget includes 61.4 authorized positions totaling \$9.3 million in personal services expenditures within the Pesticide Registration Branch, which accounts for approximately 17 percent of the department's Pesticide Programs related personal services expenditures. As shown in Exhibit 3-6, the Pesticide Registration Branch is supported 100 percent by the Department of Pesticide Regulation Fund.

Of the \$9.3 million supported by the Department of Pesticide Regulation Fund, roughly \$1.7 million or 18 percent is supported by mill revenues and \$7.6 million or 82 percent is supported by pesticide registration revenues, as illustrated in **Exhibit 3-14**. The Pesticide Registration Branch's budgeted functions include: Pesticide Registration (82%), Mitigation of Environmental Hazards (4%), Human Health & Environmental Assessment (3%), Mitigation of Human Health Risks (3%), Enforcement (3%), Pesticide Use Reporting (2%), and Mill Assessment (2%).

Exhibit 3-14
FY2022/23 Distribution of Functions – Pesticide Registration Branch

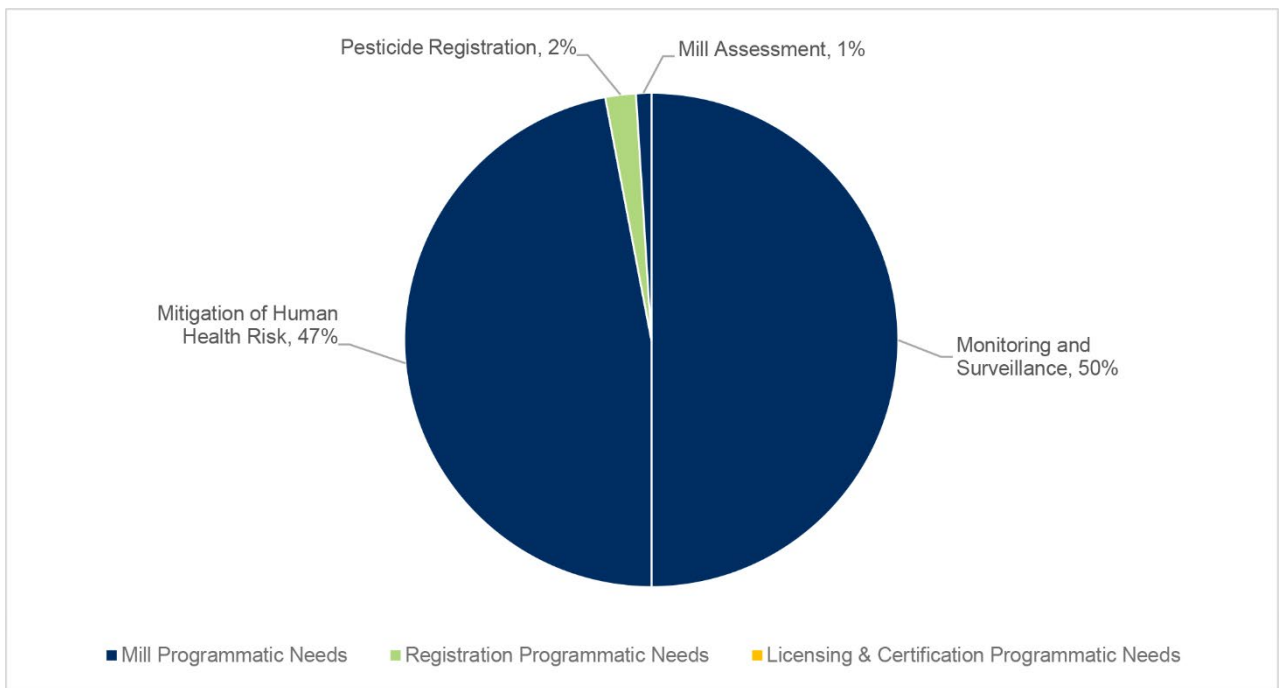


Worker Health and Safety Branch

DPR's FY2022/23 budget includes 27.6 authorized positions totaling \$4.6 million in personal services expenditures within the Worker Health and Safety Branch, which accounts for approximately 8 percent of the department's personal services expenditures. As shown in Exhibit 3-6, the Worker Health and Safety Branch is 100 percent supported by Department of Pesticide Regulation Fund

Of the \$4.6 million supported by the Department of Pesticide Regulation Fund, roughly \$4.5 million or 98 percent is supported by mill revenues and \$0.1 million or 2 percent is supported by pesticide registration revenues, as illustrated in **Exhibit 3-15**. The Worker Health and Safety Branch's budgeted functions include the following: Monitoring & Surveillance (50%), Mitigation of Human Health Risks (47%), Pesticide Registration (2%), and Mill Assessment (1%).

Exhibit 3-15
FY2022/23 Distribution of Functions – Worker Health and Safety Branch



C. Administration Current Programmatic Needs

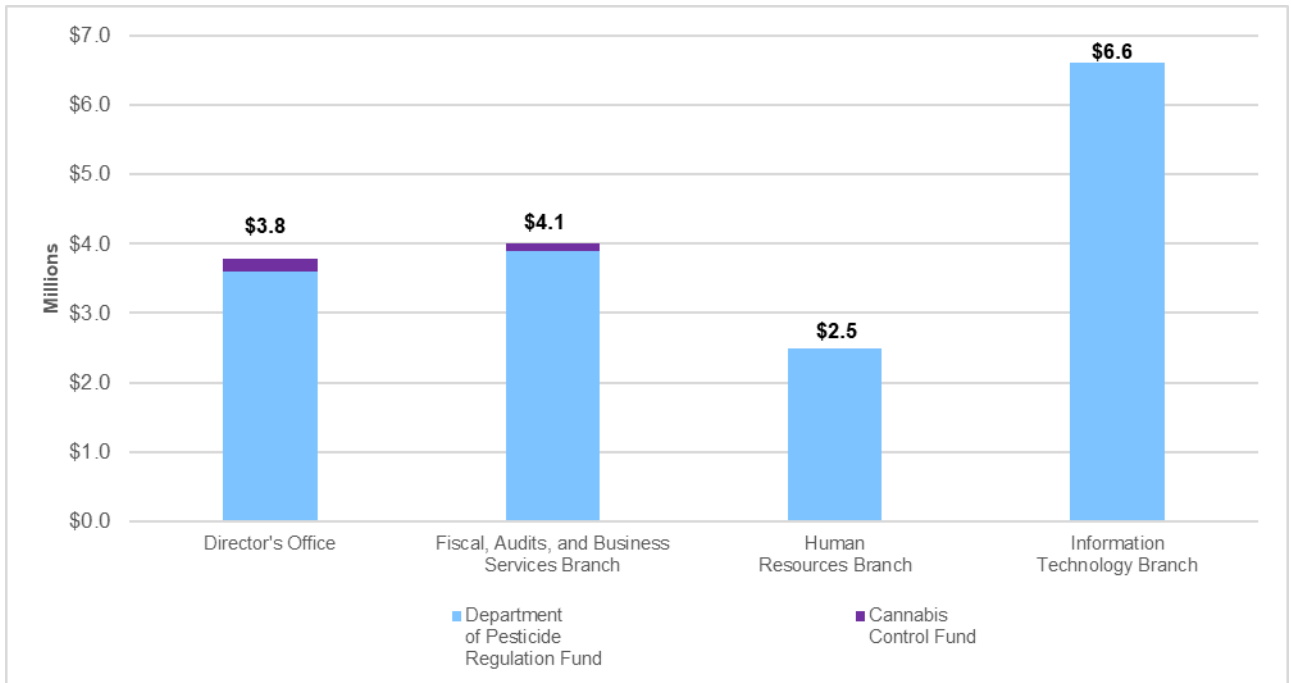
In this subsection, we describe DPR’s Administration current programmatic needs. We provide a detailed breakdown of current workload activities performed by branches within DPR’s Administration in *Appendix C*.

In total, DPR’s FY2022/23 budget for its Administration includes 106.6 authorized positions totaling \$16.9 million. **Exhibit 3-16** provides a summary of authorized positions and personal services expenditures for each organizational unit that supports DPR’s Administration. The Department of Pesticide Regulation Fund is the primary funding source for DPR’s Administration with limited funding (roughly 2 percent) from the Cannabis Control Fund, as displayed in **Exhibit 3-17**. Of the \$16.6 million supported by the Department of Pesticide Regulation Fund, mill revenues support roughly 65 percent of DPR’s branches that carry out its Administration with the remaining support coming from registration and licensing and certification revenues.

Exhibit 3-16
FY2022/23 Authorized Positions and Personal Services Expenditures – Administration

Organizational Unit	Authorized Positions	Personal Services Expenditures (in millions)
Director's Office	18.1	\$3.8
Fiscal, Audits, & Business Services Branch	31.7	4.1
Human Resources Branch	19.6	2.5
Information Technology Branch	37.2	6.6
Administration Total	106.6	\$16.9

Exhibit 3-17
FY2022/23 Funding Sources – Administration
Personal Services Expenditures (in millions)



4. Future Programmatic Needs

In this section, we summarize DPR's future programmatic needs, including both unbudgeted core and SPM programmatic needs, based on our workload analysis. We then provide detailed future programmatic needs for DPR's Pesticide Programs and Administration based on our workload analysis that "roll up" to the department's overall future programmatic needs. The results presented in this section build off the current programmatic needs detailed in *Section 3* and support the estimated mill funding implications presented in *Section 5* of this report. This section is organized as follows:

- A. *Summary of DPR's Future Programmatic Needs*
- B. *Pesticide Programs Future Programmatic Needs*
- C. *Administration Future Programmatic Needs*

A. Summary of DPR's Future Programmatic Needs

DPR's future programmatic needs reflect additional resources that the department needs to fulfill its mission. For discussion purposes, we categorize DPR's future programmatic needs into two (2) groups: unbudgeted core programmatic needs and unbudgeted SPM programmatic needs, defined below. These two categories provide useful distinctions for discussion purposes. It is important to note that there are overlaps between the two categories and that some positions and activities fit within both.

- **Unbudgeted core programmatic needs:** account for the department's existing unbudgeted "core" workload and indicate potential mill revenue or revenue from other sources are needed to support the unbudgeted workload for ongoing program obligations.
- **Unbudgeted SPM programmatic needs** account for the department's preliminary evaluation of SPM Roadmap¹⁴ related workload and indicates potential mill revenue or revenue from other sources needed to support the unfunded workload. In some cases, SPM-related work overlaps with existing programmatic activities. The unbudgeted SPM programmatic needs identified in this section represent an initial subset of SPM-related activities aligned with DPR's existing mandates.

¹⁴ The SPM Roadmap, released in January 2023, was prepared by the SPM Work Group, which includes 33 members from diverse backgrounds, including growers and other representatives from the agricultural industry, university researchers, government representatives, and community representatives who bring environmental, social justice, farm worker and Tribal perspectives. The SPM Roadmap outlines recommended goals and actions to advance both agriculture and urban SPM.

DPR’s future programmatic needs based on our workload analysis total 148.9 unbudgeted positions equating to roughly \$28.6 million, which reflects future positions and funding needs for the department’s unbudgeted core and SPM programmatic needs. Below is a summary of DPR’s future programmatic needs based our workload analysis:

- Position Needs:** Our workload analysis, based on the methodology described in *Section 2* of this report, resulted in the identification of 148.9 unbudgeted positions – 108.9 unbudgeted core programmatic positions and 40.0 unbudgeted SPM programmatic positions. DPR’s future programmatic needs are approximately 80 percent within its Pesticide Programs and 20 percent within its Administration. This allocation is proportional to the current FY2022/23 split between its Pesticide Programs and Administration authorized personal services expenditures. In **Exhibit 4-1**, we provide a comparison of the department’s FY2022/23 authorized positions and future position needs for its Pesticide Programs and Administration.
- Funding Needs:** The 148.9 unbudgeted positions amount to roughly \$28.6 million – \$20.6 million in unbudgeted core programmatic needs and \$8.0 million in SPM unbudgeted programmatic needs. In **Exhibit 4-2**, we provide a comparison of the department’s FY2022/23 authorized personal services expenditures and future funding needs for its Pesticide Programs and Administration.
- Cost of Gap:** In comparison to the department’s FY2022/23 authorized positions and personal services expenditures, DPR’s future programmatic needs result in a 34 percent increase in positions and a 43 percent increase in funding to support its total future programmatic needs, as shown in **Exhibit 4-3**. It is important to distinguish that the 43 percent increase in funding needs is comprehensive and reflects the department’s additional overall funding needed to support mill, registration, and licensing/certification related workload.

Exhibit 4-1
Summary Comparison of Current and Future Programmatic Needs – Positions

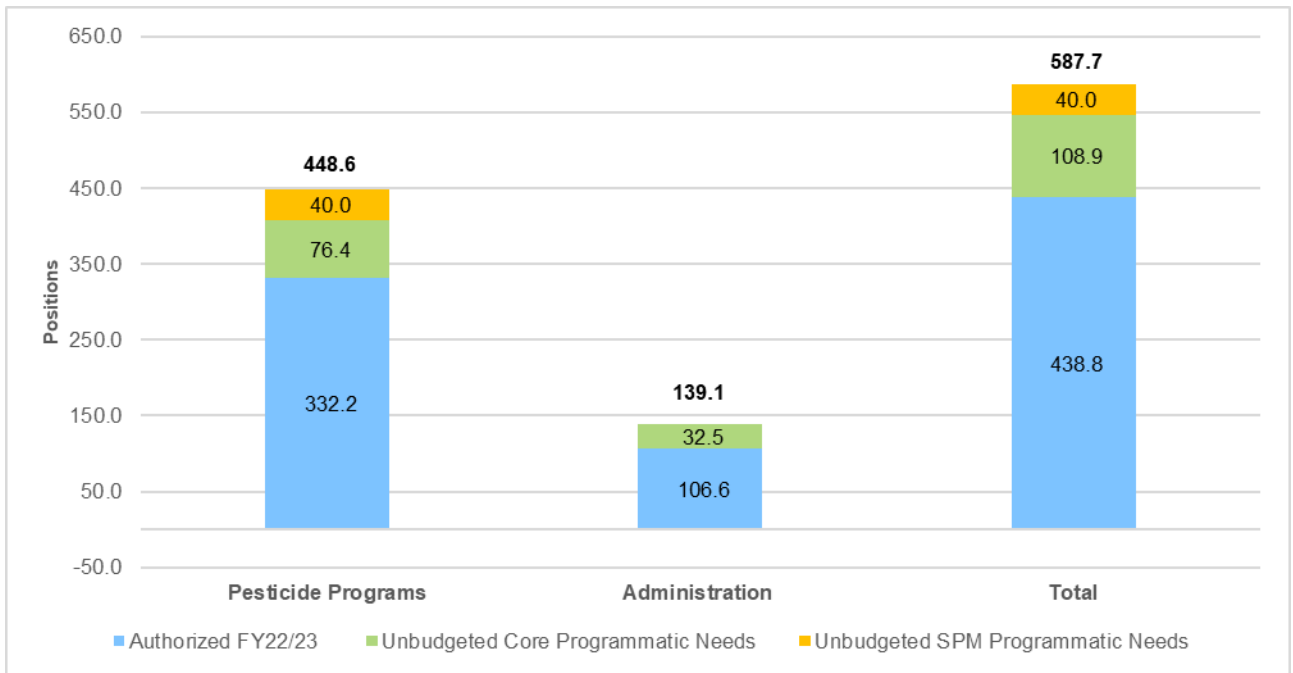


Exhibit 4-2
Summary Comparison of Current and Future Programmatic Needs
Funding for Positions (in millions)

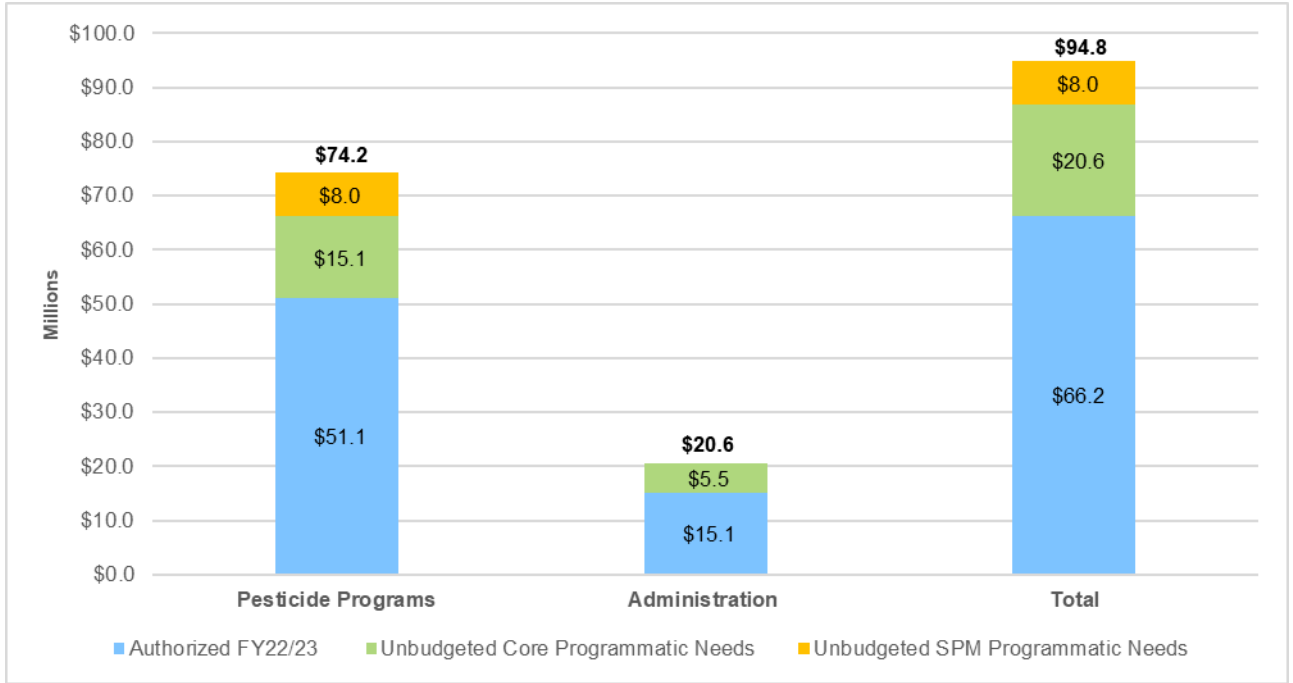


Exhibit 4-3
Total Future Programmatic Needs – Cost of Gap

Cost of Gap	Pesticide Programs	Administration	Total
Unbudgeted Core Programmatic Needs	\$14.6 million	\$6.0 million	\$20.6 million
Unbudgeted SPM Programmatic Needs	\$8.0 million	N/A	\$8.0 million
Future Programmatic Needs	\$22.6 million	\$6.0 million	\$28.6 million
Current Programmatic Needs	\$51.1 million	\$15.1 million	\$66.2 million
Estimated % Increase over FY2022/23	~44%	~40%	~43%

Unbudgeted Core Programmatic Needs

DPR's total unbudgeted core programmatic needs account for the department's existing unbudgeted core workload. In total, our workload analysis identified 76.4 Pesticide Programs positions amounting to \$14.6 million and 32.5 Administration positions amounting to \$5.9 million. In **Exhibit 4-4**, we provide a breakdown of DPR's unbudgeted core programmatic needs. DPR's Pesticide Programs account for roughly 70 percent of the department's unbudgeted core programmatic needs. DPR's Administration accounts for roughly 30 percent of the department's unbudgeted core programmatic needs.

Exhibit 4-4 Unbudgeted Core Programmatic Needs by Organizational Unit – Positions and Funding

Organizational Unit	Positions	% of Positions	Funding	% of Funding
Pesticide Programs Division	1.0	1%	\$102,000	<1%
Enforcement Headquarters Branch	18.0	17%	3,353,000	16%
Enforcement Regional Offices Branch	15.0	14%	2,937,000	14%
Environmental Monitoring Branch	10.4	10%	1,882,000	9%
Human Health Assessment Branch	6.0	6%	1,304,000	6%
Integrated Pest Management Branch	9.0	8%	1,624,000	8%
Pesticide Evaluation Branch	8.0	7%	1,628,000	8%
Pesticide Registration Branch	7.0	6%	1,393,000	7%
Worker Health & Safety Branch	2.0	2%	343,000	2%
Pesticide Programs Total	76.4	70%	\$14,566,000	71%
Director's Office	9.0	8%	1,665,000	8%
Fiscal, Audits, & Business Services Branch	6.0	6%	928,000	5%
Human Resources Branch	3.5	3%	494,000	2%
Information Technology Branch	14.0	13%	2,860,000	14%
Administration Total	32.5	30%	5,947,000	29%
Grand Total	108.9	100%	\$20,513,000	100%

Unbudgeted SPM Programmatic Needs

DPR’s total unbudgeted SPM programmatic needs account for the department’s preliminary evaluation of initial SPM Roadmap related workload. In total, our workload analysis identified 40.0 Pesticide Programs positions amounting to \$8.0 million across four branches, as shown in **Exhibit 4-5**. DPR’s unbudgeted programmatic SPM needs are almost evenly distributed between its Human Health Assessment Branch, Integrated Pest Management Branch, Pesticide Evaluation Branch, and Pesticide Registration Branch. The unbudgeted SPM programmatic activities that these positions would conduct are identified in the branch-specific exhibits that follow.

**Exhibit 4-5
Unbudgeted SPM Programmatic Needs by Organizational Unit – Positions and Funding**

Organizational Unit	Positions	% of Positions	Funding	% of Funding
Human Health Assessment Branch	10.0	25%	\$2,202,000	27%
Integrated Pest Management Branch	9.0	23%	1,757,000	22%
Pesticide Evaluation Branch	11.0	28%	2,166,000	27%
Pesticide Registration Branch	10.0	25%	1,916,000	24%
Pesticide Programs Total	40.0	100%	\$8,041,000	100%

B. Pesticide Programs Future Programmatic Needs

In this subsection, we provide detailed future programmatic needs of DPR’s Pesticide Programs based on our workload analysis. For each organizational unit, we provide the estimated increase in need compared to its current programmatic needs reflected in the FY2022/23 budget along with detailed summary of position classifications (full position classification titles, associated acronyms, and salaries can be found in *Appendix D*). DPR’s Pesticide Programs include the following nine (9) organizational units: 1) Pesticide Programs Division, 2) Enforcement Headquarters Branch, 3) Enforcement Regional Offices Branch, 4) Enforcement Monitoring Branch, 5) Human Health Assessment Branch, 6) Integrated Pest Management Branch, 7) Pesticide Evaluation Branch, 8) Pesticide Registration Branch, and 9) Worker Health and Safety Branch.

Pesticide Programs Division

Our workload analysis identified 1.0 position totaling \$102,000 within the Pesticide Programs Division, as shown in **Exhibit 4-6**. The 1.0 position is anticipated to provide administrative support to the Pesticide Programs Division. In **Exhibit 4-7**, we provide a detailed breakdown of the Pesticide Programs Division’s future programmatic needs, including position classifications, number of positions, and funding.

**Exhibit 4-6
Future Programmatic Needs – Positions and Funding**

Total Needs	Positions	Funding (in millions)
Unbudgeted Core Programmatic Needs	1.0	\$0.1
Future Programmatic Needs	1.0	\$0.1
Current Programmatic Needs	12.3	\$2.4
Estimated % Increase Over FY2022/23	8%	4%

**Exhibit 4-7
Future Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
OT (Type)	1.0	\$102,000
Total	1.0	\$102,000

Enforcement Headquarters Branch

Our workload analysis identified 18.0 positions totaling \$3.4 million within the Enforcement Headquarters Branch, as shown in **Exhibit 4-8**. Of the 18.0 positions, 7.4 positions totaling \$1.3 million are in the Licensing and Certification Program, which is funded primarily by revenues generated from licensing and certification related fees. The other 10.6 positions total \$2.1 million and are located within product compliance and residue analysis programs. The Enforcement Headquarters Branch’s future programmatic needs reflect a 36 percent increase to its current authorized positions and a 49 percent increase to authorized funding.

In **Exhibit 4-9**, we provide a detailed breakdown of the Enforcement Headquarters Branch’s total future programmatic needs, including position classifications, number of positions, and funding. The Branch level SSA position totaling 1.0 position will perform administrative functions and is allocated 40 percent to licensing and certification related activities and 60 percent to other enforcement related activities.

**Exhibit 4-8
Future Programmatic Needs – Activities, Positions, and Funding**

Summary of Activities	Positions	Funding (in millions)
<ul style="list-style-type: none"> Licensing and Certification Program: regulatory activities including enhancements to the processing and issuing of licenses, study guide and exam enhancements and development, continuing education, legal consultation, legislative bill analysis, Agricultural Pest Control Advisory Committee (APCAC) leadership 	7.4	\$1.3
<ul style="list-style-type: none"> Product Compliance Program: additional physical and online marketplace inspections State Actions Program: development of state enforcement actions for pesticide uses violations and cases, including additional enforcement actions for illegal residue cases County Oversight Program: statewide trainings to increase both the quantity and quality of CAC enforcement data reporting and response to public records act requests 	10.6	\$2.1
Future Programmatic Needs	18.0	\$3.4
Current Programmatic Needs	49.9	\$6.8
Estimated % Increase Over FY2022/23	36%	49%

**Exhibit 4-9
Future Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
EPMI (Super)	1.0	\$284,000
ES	11.0	1,892,000
OT (Type)	1.0	102,000
SES (Spec)	1.0	193,000
SES (Super)	3.0	747,000
SSA	1.0	135,000
Total	18.0	\$3,353,000

Enforcement Regional Offices Branch

Our workload analysis identified 15.0 positions totaling \$2.9 million within the Enforcement Regional Offices Branch, as shown in **Exhibit 4-10**. The 15.0 positions are evenly distributed with 5.0 unbudgeted core programmatic positions located in each of the Enforcement Regional Office’s three (3) locations – Central Regional Office, Northern Regional Office, and Southern Regional Office.

The Enforcement Regional Offices Branch’s future programmatic needs reflect a 35 percent increase to its current authorized positions and a 49 percent increase to authorized funding.

In **Exhibit 4-11**, we provide a detailed breakdown of the Enforcement Regional Office Branch’s total future programmatic needs, including position classifications, number of positions, and funding.

Exhibit 4-10 Future Programmatic Needs – Activities, Positions, and Funding

Summary of Activities	Positions	Funding (in millions)
Additional programmatic needs at the Northern, Central, and Southern Regional Offices, including but not limited to: <ul style="list-style-type: none"> • Verify statewide uniformity of the implementation of environmental laws, regulations, and policies with CAC personnel • Conduct sample collection and follow up investigations in the following programs: Food Safety Residue & Pesticide Data Program (PDP); there is currently no follow up collection in PDP • Research, analyze, and develop science-based solutions to assure compliance with complex pesticide regulations • Oversight of Pesticide Use Enforcement activities and label interpretations for CAC personnel • Conduct product compliance inspections and follow up investigations • Training, correspondence, and special reports; responses to public information requests, including other governmental agencies, and the legislature • Industry and public relations, including attendance at community events, stakeholder consultations, or Environmental Justice events 	15.0	\$2.9
Future Programmatic Needs	15.0	\$2.9
Current Programmatic Needs	42.9	\$6.0
Estimated % Increase Over FY2022/23	35%	49%

Exhibit 4-11 Future Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
ES	6.0	\$1,032,000
SES (Spec)	6.0	1,158,000
SES (Super)	3.0	747,000
Total	15.0	\$2,937,000

Environmental Monitoring Branch

Our workload analysis identified 10.4 positions totaling \$1.9 million within the Environmental Monitoring Branch, as shown in **Exhibit 4-12**. The Environmental Monitoring Branch’s 10.4 positions are distributed as follows: 5.2 positions within its Air Program, 2.0 Branch-level positions, 2.2 positions within its Groundwater Program, and 1.0 position located within its Surface Water Program. The Environmental Monitoring Branch’s future programmatic needs reflect a 21 percent increase to its current authorized positions and 24 percent increase to authorized funding.

In **Exhibit 4-13**, we provide a detailed breakdown of the Environmental Monitoring Branch’s total future programmatic needs, including position classifications, number of positions, and funding needs.

**Exhibit 4-12
Future Programmatic Needs – Activities, Positions, and Funding**

Summary of Activities	Positions	Funding
<ul style="list-style-type: none"> Air Program continuous evaluation and outreach, including community outreach Branch-level support and administrative duties, including laboratory support and contracting Ground Water Program monitoring and surveillance support Surface Water Program monitoring and surveillance support 	10.4	\$1.9
Future Programmatic Needs	10.4	\$1.9
Current Programmatic Needs	50.4	\$7.8
Estimated % Increase Over FY2022/23	21%	24%

**Exhibit 4-13
Future Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
AGPA	1.0	\$168,000
ES	6.4	1,100,000
SES (Spec)	1.0	193,000
SES (Super)	1.0	249,000
SSMI	1.0	172,000
Total	10.4	\$1,882,000

Human Health Assessment Branch

Our workload analysis identified 16.0 positions totaling \$3.5 million within the Human Health Assessment Branch, as shown in **Exhibit 4-14**. The Human Health Assessment Branch’s future programmatic needs reflect a 45 percent increase to its current authorized positions and 53 percent increase to authorized funding. Below is a breakdown of the Human Health Assessment Branch’s future programmatic needs:

- **Unbudgeted Core Programmatic Needs:** The Human Health Assessment Branch’s unbudgeted core programmatic needs, shown in **Exhibit 4-15**, total \$1.3 million and are distributed as follows: 1.0 position in Exposure Assessment, 1.0 position in Risk Assessment, 1.0 position in Toxicology and Dose Response, 2.0 positions in Product Formulation Evaluation, and 1.0 position in Active Ingredient Prioritization.
- **Unbudgeted SPM Programmatic Needs:** The Human Health Assessment Branch’s unbudgeted SPM programmatic needs, shown in **Exhibit 4-16**, total \$2.2 million and are distributed as follows: 1.0 position in Exposure Assessment, 3.0 positions in Risk Assessment, 1.0 positions in Toxicology and Dose Response, 3.0 positions in Product Formulation Evaluation, and 2.0 position in Active Ingredient. In some cases, SPM-related work overlaps with existing programmatic activities. The unbudgeted SPM programmatic needs identified in this section represent an initial subset of SPM-related activities aligned with DPR’s existing mandates

**Exhibit 4-14
Future Programmatic Needs – Activities, Positions, and Funding**

Summary of Activities	Positions	Funding (in millions)
Unbudgeted Core Programmatic Needs: <ul style="list-style-type: none"> • Human health assessment evaluation consultations workload • Implementing active ingredient (AI) prioritization • Responses to public health information needs (e.g., Notification, Spray-Drift Task Force, etc.) • CEQA compliance 	6.0	\$1.3
Unbudgeted SPM Programmatic Needs: <ul style="list-style-type: none"> • Additional and improved evaluation of currently registered higher-risk chemistries and new pesticides • Continued development of AI prioritization • Continued responses to increasing volume of requests for public health information 	10.0	\$2.2
Future Programmatic Needs	16.0	\$3.5
Current Programmatic Needs	35.6	\$6.6
Estimated % Increase Over FY2022/23	45%	53%

**Exhibit 4-15
Unbudgeted Core Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
RSII (E/B)	1.0	\$189,000
ST (Tox, Spec)	5.0	1,115,000
Total	6.0	\$1,304,000

**Exhibit 4-16
Total Unbudgeted SPM Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
ST (Tox, Super)	2.0	\$452,000
RSII (E/B)	1.0	189,000
ST (Tox, Spec)	7.0	1,561,000
Total	10.0	\$2,202,000

Integrated Pest Management Branch

Our workload analysis identified 18.0 positions totaling \$3.4 million within the Integrated Pest Management Branch, as shown in **Exhibit 4-17**. The Integrated Pest Management Branch’s future programmatic needs reflect a 72 percent increase to its current authorized positions and 78 percent increase to authorized funding. Below is a breakdown of the Integrated Pest Management Branch’s future programmatic needs:

- **Unbudgeted Core Programmatic Needs:** The Integrated Pest Management Branch’s unbudgeted core programmatic needs, shown in **Exhibit 4-18**, total \$1.6 million and are distributed as follows: 2.0 Branch-level positions, 3.0 positions in Analysis, Strategies, and Trends, 2.0 positions in Engagement and Outreach, and 2.0 positions in Innovation & Implementation.
- **Unbudgeted SPM Programmatic Needs:** The Integrated Pest Management Branch’s unbudgeted SPM programmatic needs, shown in **Exhibit 4-19**, total \$1.8 million and are distributed as follows: 1.0 Branch-level position, 5.0 positions in Analysis, Strategies, and Trends, and 3.0 positions in Engagement and Outreach.

**Exhibit 4-17
Future Programmatic Needs – Activities, Positions, and Funding**

Summary of Activities	Positions	Funding (in millions)
Unbudgeted Core Programmatic Needs: <ul style="list-style-type: none"> • Pesticide usage reporting data analysis, quality control, stewardship, GIS/spatial projects, and public records requests • Schools Program rulemaking to support Healthy Schools Act (HSA) compliance reporting enhancements, IPM outreach at schools and other sensitive sites • IPM grant management and funding to support increased outreach to potential applicants, achievement of grant outcomes, and completion of more projects that increase practitioner access to IPM knowledge, tools, and resources available • Endangered Species Program outreach and improvements 	9.0	\$1.6
Unbudgeted SPM Programmatic Needs: <ul style="list-style-type: none"> • SPM implementation, leadership, policy development, coordination and project management, stakeholder outreach • SPM related urban use data collection, review, and system planning, development and implementation, stewardship, stakeholder outreach • Development of SPM related licensing criteria, online course development for Pest Control Advisers (PCAs), SPM integration in Extreme Heat (EH) projects, and outreach to various agencies and organizations on SPM adoption in sectors such as multi-family housing, local stormwater pollution prevention, food service facilities, municipal operations/programs, etc. • Market outreach, public awareness campaign support, development and outreach regarding pest and disease workbooks, invasive species, biosecurity tools, and sector targeted SPM toolkits • Development and maintenance of SPM webpage, focused social media promotion of SPM, and coordination and integration of SPM messaging and goals into Extreme Heat projects 	9.0	\$1.8
Future Programmatic Needs	18.0	\$3.4
Current Programmatic Needs	25.1	\$4.4
Estimated % Increase Over FY2022/23	72%	78%

Exhibit 4-18

Total Unbudgeted Core Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
AGPA	1.0	\$168,000
ES	3.0	516,000
SES (Spec)	3.0	579,000
SSMI	1.0	172,000
RSII (E/B)	1.0	189,000
Total	9.0	\$1,624,000

Exhibit 4-19

Total Unbudgeted SPM Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
AGPA	1.0	168,000
EPMI (Super)	1.0	284,000
ES	2.0	344,000
SES (Spec)	4.0	772,000
RSII (E/B)	1.0	189,000
Total	9.0	\$1,757,000

Pesticide Evaluation Branch

Our workload analysis identified 19.0 positions totaling \$3.7 million within the Pesticide Evaluation Branch, as shown in **Exhibit 4-20**. The Pesticide Evaluation Branch’s future programmatic needs reflect a 70 percent increase to its current authorized positions and 89 percent increase to authorized funding. Below is a breakdown of the Pesticide Evaluation Branch’s future programmatic needs:

- **Unbudgeted Core Programmatic Needs:** The Pesticide Evaluation Branch’s unbudgeted core programmatic needs, shown in **Exhibit 4-21**, total \$1.6 million and are distributed as follows: 5.0 position in Microbiology & Chemistry, 2.0 positions in Ecotoxicology, and 1.0 position in Plants and Pests.
- **Unbudgeted SPM Programmatic Needs:** The Pesticide Evaluation Branch’s unbudgeted SPM programmatic needs, shown in **Exhibit 4-22**, total \$2.1 million and are distributed as follows: 7.0 positions in Microbiology and 4.0 positions in Chemistry.

Exhibit 4-20
Future Programmatic Needs – Activities, Positions, and Funding

Summary of Activities	Positions	Funding (in millions)
Unbudgeted Core Programmatic Needs: Pesticide evaluation process improvements, including rulemaking, to meet existing workload demand within the following areas: <ul style="list-style-type: none"> • Ecotoxicology • Microbiology • Chemistry • Plants, Pests, and Diseases • CEQA compliance 	8.0	\$1.6
Unbudgeted SPM Programmatic Needs: <ul style="list-style-type: none"> • Additional and improved evaluation within ecotoxicology, microbiology, chemistry, and plants, pests, and diseases evaluation stations for currently registered higher-risk chemistries and new pesticides • Revisions to evaluation reports to improve transparency and accessibility 	11.0	\$2.1
Future Programmatic Needs	19.0	\$3.7
Current Programmatic Needs	27.0	\$4.2
Estimated % Increase Over FY2022/23	70%	89%

Exhibit 4-21

Total Unbudgeted Core Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
EPMI (Super)	1.0	\$284,000
ES	3.0	516,000
SES (Spec)	3.0	579,000
SES (Super)	1.0	249,000
Total	8.0	\$1,628,000

Exhibit 4-22

Total Unbudgeted SPM Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
EPMI (Super)	1.0	\$284,000
ES	6.0	1,030,000
RSIII	2.0	410,000
SES (Spec)	1.0	193,000
SES (Super)	1.0	249,000
Total	11.0	\$2,166,000

Pesticide Registration Branch

Our workload analysis identified 17.0 positions totaling \$3.3 million within the Pesticide Registration Branch, as shown in **Exhibit 4-23**. The Pesticide Registration Branch’s future programmatic needs reflect a 28 percent increase to its current authorized positions and 37 percent increase to authorized funding. Below is a breakdown of the Pesticide Registration Branch’s future programmatic needs:

- **Unbudgeted Core Programmatic Needs:** The Pesticide Registration Branch’s unbudgeted core programmatic needs, shown in **Exhibit 4-24**, total \$1.4 million. All 7.0 positions are regulatory in nature.
- **Unbudgeted SPM Programmatic Needs:** The Pesticide Registration Branch’s unbudgeted SPM programmatic needs, shown in **Exhibit 4-25**, total \$1.9 million and are distributed as follows: 8.0 positions for regulatory analysis and processing, and 2.0 positions for technical support.

Exhibit 4-23
Future Programmatic Needs – Activities, Positions, and Funding

Summary of Activities	Positions	Funding (in millions)
Unbudgeted Core Programmatic Needs: Pesticide registration timeline reduction activities, including but not limited to: <ul style="list-style-type: none"> • Implementation of new policies and enhanced procedures • Implementation of electronic transmission of documentation for registration actions (e.g., new product registrations and product label amendments, etc.) in addition to acceptance of hard copy letters • Examine the feasibility for alternative processes for secondary products (e.g., Alternative Brand Names, repackages, sub-registrations, etc.) reviews • Updates to DPR’s Notification and Non-Notification Policy • Examine the feasibility for pre-screening applications 	7.0	\$1.4
Unbudgeted SPM Programmatic Needs: <ul style="list-style-type: none"> • Prioritized review for safer, more sustainable products • Implementation of new SPM related policies and enhanced procedures • Enhanced registration processes 	10.0	\$1.9
Future Programmatic Needs	17.0	\$3.3
Current Programmatic Needs	61.4	\$8.8
% Increase over FY2022/23 Budget	28%	37%

Exhibit 4-24

Total Unbudgeted Core Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
EPMI (Super)	1.0	\$284,000
ES	5.0	860,000
SES (Super)	1.0	249,000
Total	7.0	\$1,393,000

Exhibit 4-25

Total Unbudgeted SPM Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
EPMI (Super)	1.0	284,000
ES	5.0	860,000
PTII	1.0	102,000
SES (Super)	2.0	498,000
SSMI	1.0	172,000
Total	10.0	\$1,916,000

Worker Health and Safety Branch

Our workload analysis identified 2.0 positions totaling \$343,000 within the Worker Health and Safety Branch, as shown in **Exhibit 4-26**. The Worker Health and Safety Branch’s future programmatic needs include 1.0 position in Exposure Monitoring and 1.0 position in Human Health Mitigation. The Worker Health and Safety Branch’s future programmatic needs reflect a 7 percent increase to its current authorized positions and an 8 percent increase to authorized funding.

In **Exhibit 4-27**, we provide a detailed breakdown of the Worker Health and Safety Branch’s future programmatic needs, including position classifications, number of positions, and funding.

**Exhibit 4-26
Future Programmatic Needs – Activities, Positions, and Funding**

Summary of Activities	Positions	Funding (in millions)
<ul style="list-style-type: none"> Exposure Monitoring and Industrial Hygiene Program: worker exposure and application studies, evaluation of new personal protective equipment (PPE), and outreach to urban pesticide users Human Health Mitigation Program: outreach on pesticide safety to diverse communities; conduct research and development of mitigation measures on additional AIs; outreach to urban areas 	2.0	\$0.3
Future Programmatic Needs	2.0	\$0.3
Current Programmatic Needs	27.6	\$4.1
Estimated % Increase Over FY2022/23	7%	8%

**Exhibit 4-27
Future Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
AIH	1.0	\$193,000
IO (Spec)	1.0	150,000
Total	2.0	\$343,000

C. Administration Future Programmatic Needs

In this subsection, we provide the future programmatic needs of DPR’s Administration based on our workload analysis. For each organizational unit, we provide the estimated increase in need compared to its current programmatic needs reflected in the FY2022/23 budget along with detailed summary of position classifications (full position titles, associated acronyms, and salaries can be found in *Appendix D*). It is important to note that Administration future programmatic needs reflect DPR’s unbudgeted core programmatic needs and do not include unbudgeted SPM programmatic needs. DPR’s Administration includes the following four (4) organizational units: 1) Director’s Office, 2) Fiscal, Audits, and Business Services Branch, 3) Human Resources Branch, and 4) Information Technology Branch.

Director’s Office

Our workload analysis identified 9.0 positions within the Director’s Office totaling \$1.7 million, as shown in **Exhibit 4-28**. Of the 9.0 positions, 2.0 positions totaling \$322,000 are in the Office of Environmental Justice and Tribal Affairs, 4.0 positions totaling \$868,000 are in the Office of Legal Affairs, 1.0 position totaling \$172,000 is in the Office of Legislation and Policy, and 2.0 positions totaling \$303,000 are office-level support. The Director’s Office future programmatic needs reflect a 50 percent increase to its current authorized positions and a 50 percent increase to authorized funding.

In **Exhibit 4-29**, we provide a detailed breakdown of the Director’s future programmatic needs, including position classifications, number of positions, and funding.

Exhibit 4-28
Future Programmatic Needs – Activities, Positions, and Funding

Summary of Activities	Positions	Funding (in millions)
<ul style="list-style-type: none"> • Legal affairs to support additional alignment with the department’s various legal requirements, mandates, and regulations • Outreach and public affairs to legislative, industry, environmental justice, and tribal stakeholders • Office-level support 	9.0	\$1.7
Future Programmatic Needs	9.0	\$1.7
Current Funding Needs	18.1¹⁵	\$3.3
Estimated % Increase Over FY2022/23	50%	50%

¹⁵ Includes one (1) position in the Administrative Services Division.

**Exhibit 4-29
Future Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
A	2.0	440,000
AAE	1.0	153,000
AAII	1.0	150,000
AGPA	1.0	168,000
AIII	1.0	260,000
ES	2.0	344,000
IO (Spec)	1.0	150,000
Total	9.0	\$1,665,000

Fiscal, Audits, and Business Services Branch

Our workload analysis identified 6.0 positions within the Fiscal, Audits, and Business Services Branch totaling \$928,000, as shown in **Exhibit 4-30**. Of the 6.0 positions, 2.0 positions totaling \$258,000 are in the Accounting Office, 1.0 position totaling \$177,000 is in Audits, 2.0 positions totaling \$336,000 are in the Budget Office, and 1.0 position totaling \$157,000 is in the Business Services Office. The Fiscal, Audits, and Business Services Branch’s future programmatic needs reflect a 19 percent increase to its current authorized positions and a 25 percent increase to authorized funding.

In **Exhibit 4-31**, we provide a detailed breakdown of the Fiscal, Audits, and Business Services Branch’s future programmatic needs, including position classifications, number of positions, and funding.

Exhibit 4-30 Future Programmatic Needs – Activities, Positions, and Funding

Summary of Activities	Positions	Funding
<ul style="list-style-type: none"> • Departmental accounting, including but not limited to cashiering, accounts payable, and reporting processes • MillPay administration, compliance, controls, and stakeholder management • Departmental budget management and administration • Audits, case reviews, and administration • Contracts and procurement 	6.0	\$1.9
Future Programmatic Needs	6.0	\$1.9
Current Programmatic Needs	31.7	\$0.9
% Increase over FY2022/23	19%	25%

Exhibit 4-31 Future Programmatic Needs – Detailed Positions and Funding

Position Classification	Positions	Funding
ABMA	1.0	\$157,000
AGPA	2.0	336,000
AMA	1.0	177,000
AO (Spec)	1.0	140,000
AT (Acc, Train)	1.0	118,000
Total	6.0	\$928,000

Human Resources Branch

Our workload analysis identified 3.5 positions within the Human Resources Branch totaling roughly \$500,000, as shown in **Exhibit 4-32**. Of the 3.5 positions, 1.0 position totaling \$172,000 is in Performance Management, 0.5 Branch-level position totaling \$52,000, 1.0 position totaling \$135,000 is in Safety and Development, 1.0 position totaling \$135,000 is in Personnel Services. The Human Resources Branch’s future programmatic needs reflect an 18 percent increase to its current authorized positions and a 22 percent increase to authorized funding.

In **Exhibit 4-33**, we provide a detailed breakdown of the Human Resources Branch’s future programmatic needs, including position classifications, number of positions, and funding.

**Exhibit 4-32
Future Programmatic Needs – Activities, Positions, and Funding**

Summary of Activities	Positions	Funding (in millions)
<ul style="list-style-type: none"> • Leave Benefits Administration • Health and safety administration • General personnel services 	3.5	\$0.5
Future Programmatic Needs	3.5	\$0.5
Current Programmatic Needs	19.6	\$2.2
Estimated % Increase Over FY2022/23	18%	22%

**Exhibit 4-33
Future Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
SSA	2.0	\$270,000
SSMI	1.0	172,000
OT (General)	0.5	52,000
Total	3.5	\$494,000

Information Technology Branch

Our workload analysis identified 14.0 positions within the Information Technology Branch totaling \$2.9 million, as shown in **Exhibit 4-34**. Of the 14.0 positions, 2.0 positions totaling \$421,000 are in Web Development, 1.0 position totaling \$208,000 is in Technology Infrastructure, 3.0 positions totaling \$562,000 are in Infrastructure Support, 4.0 positions totaling \$837,000 are in Information Security, 1.0 position totaling \$208,000 is in Application Development and Database, and 3.0 positions totaling \$624,000 are in Project Management and Compliance. The Information Technology Branch’s future programmatic needs reflect a 38 percent increase to its current authorized positions and a 49 percent increase to authorized funding.

In **Exhibit 4-35**, we provide a detailed breakdown of the Information Technology Branch’s future programmatic needs, including position classifications, number of positions, and funding.

**Exhibit 4-34
Future Programmatic Needs – Activities, Positions, and Funding**

Summary of Activities	Positions	Funding (in millions)
<ul style="list-style-type: none"> • Web development support and other services • GIS infrastructure support • Enterprise software and procurement support • Information security and privacy oversight and support for patching technical needs • Database administration • Portfolio management and compliance, including project management and contract management 	14.0	\$2.9
Future Programmatic Needs	14.0	\$2.9
Current Programmatic Needs	37.2	\$5.9
Estimated % Increase Over FY2022/23	38%	49%

**Exhibit 4-35
Future Programmatic Needs – Detailed Positions and Funding**

Position Classification	Positions	Funding
ITA	2.0	\$354,000
ITSI (Spec)	10.0	2,080,000
ITSII (Super)	2.0	426,000
Total	14.0	\$2,860,000

5. Estimated Mill Funding Implications

In this section, we summarize estimated mill funding implications considering DPR's current programmatic needs presented in *Section 3* and future programmatic needs based on from our workload analysis summarized in *Section 4*. This section is organized as follows:

- A. *Estimated Funding for Future Programmatic Needs*
- B. *Estimated Mill Funding Implications*
- C. *Other Potential Mill Funding Needs and Next Steps.*

A. Estimated Funding for Future Programmatic Needs

Our workload analysis indicates DPR's future programmatic needs for mill, registration, and licensing and certification related workload total roughly \$28.6 million to support nearly 150 new positions. Crowe allocated DPR's future programmatic needs based on our workload analysis to an estimated appropriate funding source (i.e., mill, registration, and licensing & certification) based on each position's anticipated workload activities. In **Exhibit 5-1**, we provide the results of our allocation of DPR's future programmatic needs for each organizational unit. Below is a summary of key highlights:

- **Mill Programmatic Needs**
 - Unbudgeted Core Needs: 50.0 positions totaling \$9.5 million in Pesticide Programs; 2.0 positions totaling \$336,000 in Administration
 - Unbudgeted SPM Needs: 14.0 positions totaling \$2.8 million in Pesticide Programs
- **Registration Programmatic Needs**
 - Unbudgeted Core Needs: 18.0 positions totaling \$3.7 million in Pesticide Programs
 - Unbudgeted SPM Needs: 26.0 positions totaling \$5.2 million in Pesticide Programs.
- **Licensing and Certification Programmatic Needs**
 - Unbudgeted Core Needs: 7.4 positions totaling roughly \$1.3 million in Pesticide Programs
- **Administration Programmatic Needs**
 - Unbudgeted Core Needs: 1.0 position totaling \$102,000 in Pesticide Programs and 30.5 positions in Administration totaling \$5.6 million.

Crowe allocated DPR's future administration programmatic needs, totaling \$5.7 million, to account for revenues needed to support the department's administration programmatic needs. This estimated allocation, shown in **Exhibit 5-2**, indicates DPR's future administration programmatic needs require approximately \$3.4 million in mill revenues, \$1.7 million in registration revenues, and \$600,000 in licensing and certification revenues.

As shown in **Exhibit 5-3**, we estimate the department would need approximately \$16.1 million in mill revenues, \$10.6 million in registration revenues, and \$1.9 million in licensing and certification revenues to support its future programmatic needs totaling \$28.6 million. In **Exhibit 5-4**, we provide the distribution of DPR's future programmatic needs, which includes 57 percent mill revenues, 37 percent registration revenues, and 6 percent licensing and certification revenues.

**Exhibit 5-1
Summary Results of Total Future Programmatic Needs by Funding Source**

Organizational Unit	Mill Programmatic Needs				Registration Programmatic Needs				Licensing & Certification Programmatic Needs				Administration Programmatic Needs				Total Future Programmatic Needs			
	Core		SPM		Core		SPM		Core		SPM		Core		SPM		Core		SPM	
	Positions	Funding	Positions	Funding	Positions	Funding	Positions	Funding	Positions	Funding	Positions	Funding	Positions	Funding	Positions	Funding	Positions	Funding	Positions	Funding
Pesticide Programs																				
Pesticide Programs Division	-	-	-	-			-	-	-	-	-	-	1.0	102,000	-	-	1.0	102,000	-	-
Enforcement Headquarters Branch	10.6	2,067,000	-	-			-	-	7.4	1,286,000	-	-	-	-	-	-	18.0	3,353,000	-	-
Enforcement Regional Offices Branch	15.0	2,937,000	-	-			-	-	-	-	-	-	-	-	-	-	15.0	2,937,000	-	-
Environmental Monitoring Branch	10.4	1,882,000	-	-			-	-	-	-	-	-	-	-	-	-	10.4	1,882,000	-	-
Human Health Assessment Branch	3.0	635,000	5.0	1,084,000	3.0	669,000	5.0	1,118,000	-	-	-	-	-	-	-	-	6.0	1,304,000	10.0	2,202,000
Integrated Pest Management Branch	9.0	1,624,000	9.0	1,757,000			-	-	-	-	-	-	-	-	-	-	9.0	1,624,000	9.0	1,757,000
Pesticide Evaluation Branch	-	-	-	-	8.0	1,628,000	11.0	2,166,000	-	-	-	-	-	-	-	-	8.0	1,628,000	11.0	2,166,000
Pesticide Registration Branch	-	-	-	-	7.0	1,393,000	10	1,916,000	-	-	-	-	-	-	-	-	7.0	1,393,000	10.0	1,916,000
Worker Health & Safety Branch	2.0	343,000	-	-			-	-	-	-	-	-	-	-	-	-	2.0	343,000	-	-
Administration																				
Director's Office	-	-	-	-	-	-	-	-	-	-	-	-	9.0	1,665,000	-	-	9.0	1,665,000	-	-
Fiscal, Audits, & Business Services Branch	2.0	336,000	-	-	-	-	-	-	-	-	-	-	4.0	592,000	-	-	6.0	928,000	-	-
Human Resources Branch	-	-	-	-	-	-	-	-	-	-	-	-	3.5	494,000	-	-	3.5	494,000	-	-
Information Technology Branch	-	-	-	-	-	-	-	-	-	-	-	-	14.0	2,860,000	-	-	14.0	2,860,000	-	-
Total Pesticide Programs	50.0	9,488,000	14.0	2,841,000	18.0	3,690,000	26.0	5,200,000	7.4	1,286,000	-	-	1.0	102,000	-	-	76.4	14,566,000	40.0	8,041,000
Total Administration	2.0	336,000	-	-	-	-	-	-	-	-	-	-	30.5	5,611,000	-	-	32.5	5,947,000	-	-
Total	52.0	9,824,000	14.0	2,841,000	18.0	3,690,000	26.0	5,200,000	7.4	1,286,000	-	-	31.5	5,713,000	-	-	108.9	20,513,000	40.0	8,041,000

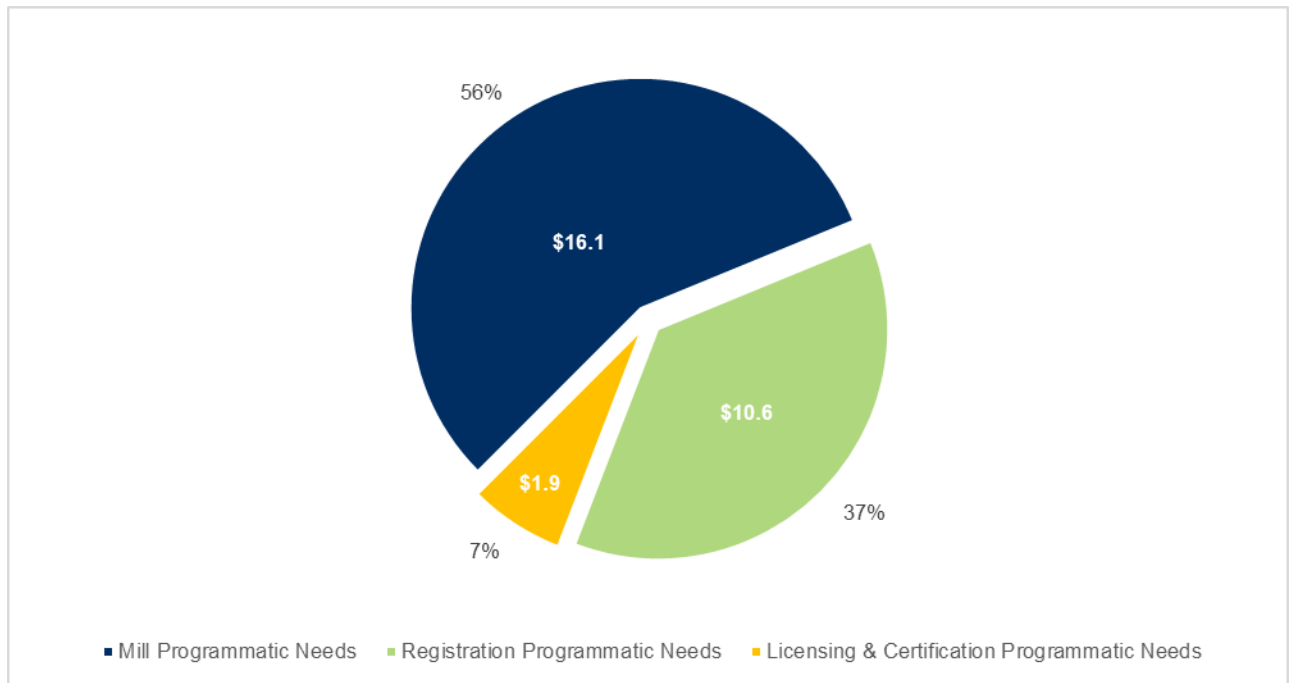
**Exhibit 5-2
Allocation of Future Administration Programmatic Needs**

Estimated Revenue Requirement	Estimated Allocation (%)	Administration Programmatic Needs
Mill Revenues	60%	\$3,400,000
Registration Revenues	30%	\$1,700,000
Licensing & Certification Revenues	10%	\$600,000
Total Indirect Programmatic Needs	100%	\$5,700,000

**Exhibit 5-3
Estimated Total Future Programmatic Needs**

Estimated Revenue Requirement	Mill Programmatic Needs	Registration Programmatic Needs	Licensing & Certification Programmatic Needs	Administration Programmatic Needs	Total
Mill Revenues	\$12,700,000	–	–	\$3,500,000	\$16,100,000
Registration Revenues	–	\$8,900,000	–	\$1,700,000	\$10,600,000
Licensing & Certification Revenues	–	–	\$1,300,000	\$600,000	\$1,900,000
Total Future Needs					\$28,600,000

**Exhibit 5-4
Distribution of Future Programmatic Needs**



B. Estimated Mill Funding Implications

The implications described in this subsection signal the estimated total mill revenues required to support DPR’s current and future programmatic needs for its mill related responsibilities. The implications described in this subsection do not account for *additional* funding to support other programmatic needs described in the Concept Paper, including additional funding for CDFA, CACs, potential reserve needs, other needs, and positive incentives. Crowe will continue to consult DPR, CACs, CDFA, and interested stakeholders to obtain feedback on these other mill usage considerations described in the Concept Paper to develop mill recommendations.

Summary Implications

DPR’s estimated total revenue requirement to support its current and future mill-related programmatic needs is approximately \$118.2 million, as shown in **Exhibit 5-5**. Assuming FY2021/22 pesticide sales¹⁶, DPR would need a \$0.0232 mill rate to support its current programmatic needs. This equates to a 10.5 percent increase to the current mill rate of \$0.021. To support the future programmatic needs identified in this report, DPR would need roughly an incremental rate of \$0.0037. Together, DPR’s estimated total revenue requirement of approximately \$118.2 million requires a minimum mill rate of \$0.0269 or a 27.9 percent increase to the current mill assessment rate.

In **Exhibit 5-6**, we provide an example of a mill rate “build-up” accounting for the \$0.0269 total minimum mill rate to support DPR’s current and future programmatic needs. Assuming FY2021/22 pesticide sales, the current mill rate of \$0.021 is not adequate to support DPR’s current and future programmatic needs.

Finally, in **Exhibit 5-7**, we provide a range of estimated mill rates to support DPR’s current and future programmatic needs for its mill related responsibilities of approximately \$118.2 million assuming potential changes in future pesticide sales as compared to FY2021/22 levels. For example, a 20% increase in FY2021/22 pesticide sales levels would equate to a \$0.0220 minimum mill rate, whereas a 20% decrease in FY2021/22 pesticide sales would equate to a \$0.0330 minimum mill rate.

Exhibit 5-5 Estimated Total Revenue Requirement

Programmatic Needs	Total	Incremental Mill Rate ¹⁷	% Increase
Current Programmatic Needs ¹⁸	\$102,100,000	\$0.0232	10.5%
Future Programmatic Needs	\$16,100,000	\$0.0037	17.42%
Estimated Total Revenue Requirement	\$118,200,000	\$0.0269	27.93%

¹⁶ FY2021/22 estimated pesticide sales totaled roughly \$4.4 billion.

¹⁷ Programmatic needs divided by FY2021/22 estimated pesticide sales.

¹⁸ Based on FY2022/23 budgeted programmatic needs for DPR’s mill related authorized expenditures, including the department’s Pesticide Programs, CACs, fund users, and other expenditures (e.g., pro rata and supplemental pension obligations).

Exhibit 5-6
Estimated Total Revenue Requirement
Example of Minimum Mill Rate to Support Current and Future Programmatic Needs

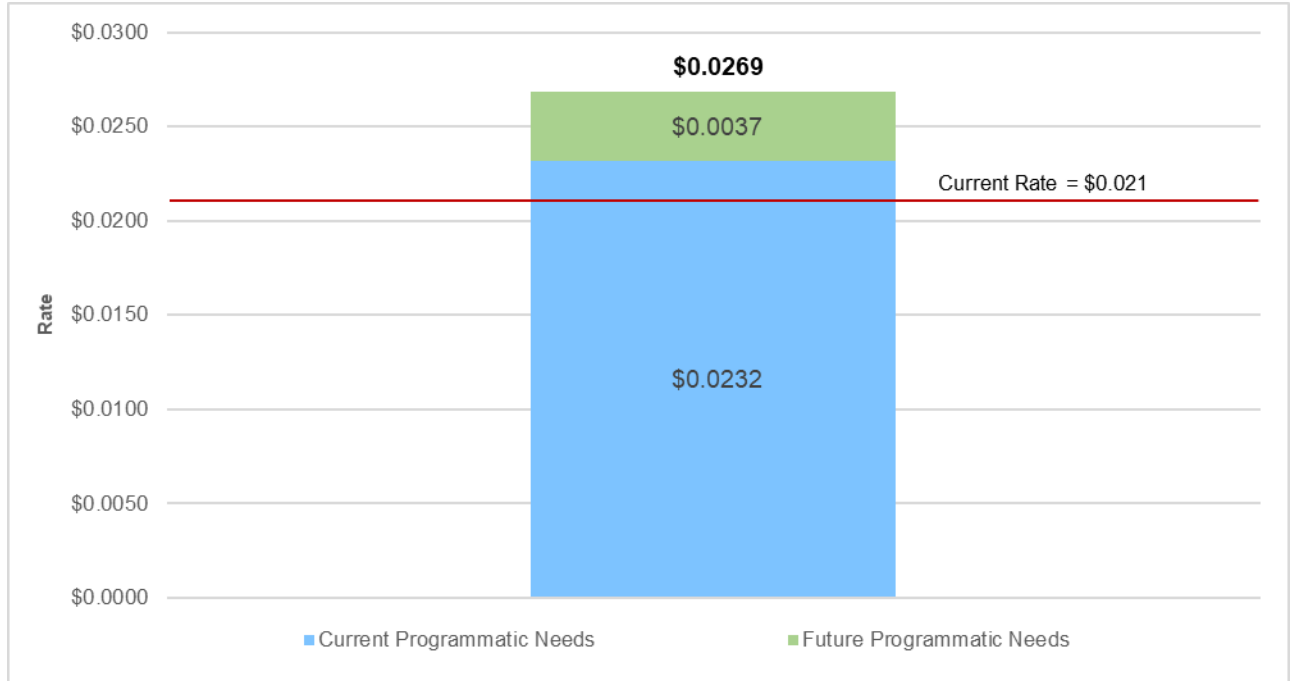
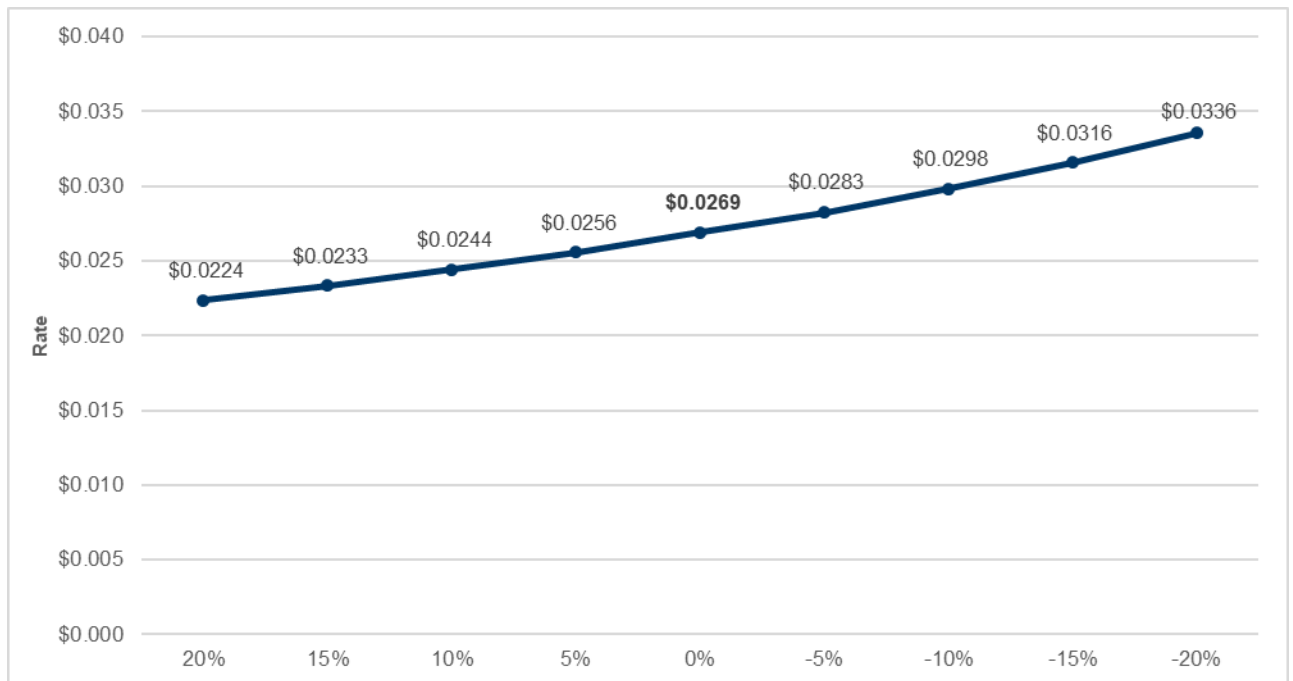


Exhibit 5-7
Minimum Mill Rate to Support Current and Future Programmatic Needs
Assuming Changes Compared to FY2021/22 Pesticide Sales



Detailed Implications

We estimate that DPR’s estimated funding gap to support its current programmatic needs is roughly \$3.8 million, and an additional \$28.6 million to support its future programmatic needs for mill, registration, and licensing and certification related responsibilities. In total, DPR’s estimated funding gap equates to roughly \$32.4 million to support its current and future programmatic needs for mill, registration, and licensing and certification related responsibilities. It is important to note this overall funding gap estimate is based off budgeted FY2022/23 programmatic needs (i.e., DPR’s estimated future needs by program in future years may decrease or increase depending on actual need). Here is breakdown of the DPR’s estimated funding gap by program, as shown in **Exhibit 5-8**:

- **Estimated Mill Programmatic Funding Gap:** \$13.2 million for future programmatic needs programmatic needs.
- **Estimated Registration Programmatic Funding Gap:** \$5.6 million for current programmatic needs and \$10.6 million for future programmatic needs totaling \$16.3 million in total programmatic needs.
- **Estimated Licensing & Certification Programmatic Funding Gap:** \$1.0 million for current programmatic needs and \$1.9 million for future programmatic needs totaling \$2.9 million in total programmatic needs.

**Exhibit 5-8
Estimated Funding Gap**

Category	Mill Programmatic Needs	Registration Programmatic Needs	Licensing & Certification Programmatic Needs	Total Needs
Current Programmatic Needs				
A. FY2022/23 Budgeted Revenues	\$104,955,000 ¹⁹	\$21,494,000	\$2,343,000	\$128,792,000
B. FY2022/23 Budgeted Expenditures	102,103,000	\$27,135,000	\$3,368,000	\$132,606,000
C. Surplus/Deficit (A – B)	\$2,852,000	\$(5,641,000)	\$(1,025,000)	\$(3,800,000)
Future Programmatic Needs				
D. Future Programmatic Needs	\$16,100,000	\$10,600,000	\$1,900,000	\$28,600,000
E. Net (C – D)	\$(13,248,000)	\$(16,241,000)	\$(2,925,000)	\$(32,414,000)
Estimated Revenue Requirement				
F. Total Programmatic Needs (B + D)	\$118,203,000	\$37,735,000	\$5,268,000	\$161,206,000
Estimated Funding Gap				
G. Estimated Funding Gap (A - F)	\$(13,248,000)	\$(16,241,000) ²⁰	\$(2,925,000)	\$(32,414,000)

¹⁹ Includes a small proportion of other revenues such as violations, delinquent fees, and interest.

²⁰ The estimated funding gap for registration programmatic needs will likely decrease in future years once the CalPEST system is finalized.

C. Other Potential Mill Funding Needs and Next Steps

Crowe's Concept Paper identified other potential mill funding needs, including funding for CACs, other needs, reserve needs, and positive incentives. The results presented in this report do not account for these other potential mill funding needs:

- **CAC funding needs:** Account for additional funding options outside of the CACs' current distribution criteria to support county-level pesticide use enforcement programmatic needs
- **Other funding needs:** Account for the mill's future level of support for other needs, primarily including support for CDFA
- **Reserve funding needs:** Accounts for additional funding to safeguard the Department of Pesticide Regulation Fund's reserve to mitigate the department's funding risk. Maintaining a fund reserve will help ensure continuity of essential DPR functions including public services
- **Positive incentives:** Account for additional funding for positive incentives to further support the transition to safer, sustainable pest management. The level of incentives would be based on the activities to be funded and could include expansion of existing programs as well as new programs.

Crowe will continue to consult DPR, CACs, CDFA, and interested stakeholders to obtain feedback on these other mill usage considerations to develop mill recommendations. Additional funding to support CACs, CDFA, reserve needs, and positive incentives would likely impact DPR's revenue requirement and mill rate(s). As a next step, Crowe will continue to evaluate the results presented in this report along with other potential mill funding needs to develop our mill recommendations. Crowe's eventual mill recommendations resulting from the Mill Assessment Study will also include our analysis of mill design and implementation considerations presented in the Concept Paper.

Appendix A: Department of Pesticide Regulation Fund Condition

Exhibit A-1 provides a summary of the Department of Pesticide Regulation Fund condition from FY2014/15 through FY2022/23, showing its revenues, expenditures, fund balance, and net activity for the past nine fiscal years. This exhibit identifies DPR's mill, registration, and licensing and certification related revenues and expenditures.

**Exhibit A-1
Summary of Department of Pesticide Regulation Fund Condition
FY2014/15 through FY 2022/23**

	Actual FY2014/15	Actual FY2015/16	Actual FY2016/17	Actual FY2017/18	Actual FY2018/19	Actual FY2019/20	Actual FY2020/21	Actual FY2021/22	Budgeted FY2022/23
Balance	\$16,595,000	\$15,442,000	\$18,053,000	\$20,292,000	\$20,708,000	\$17,805,000	\$14,045,000	\$19,011,000	\$12,353,000
Adj./Transfers	409,000	338,000	–	8,954,000	2,691,000	169,000	1,375,000	971,000	–
Adj. Balance	17,004,000	15,780,000	18,053,000	29,246,000	23,399,000	17,974,000	15,420,000	19,982,000	12,353,000
Revenues									
Mill Revenues ²¹	72,873,000	75,931,000	80,615,000	80,094,000	82,467,000	86,938,000	95,343,000	95,660,000	104,955,000
Registration Revenues	10,710,000	16,065,000	16,405,000	16,035,000	15,839,000	15,896,000	16,181,000	21,029,000	21,494,000
Licensing & Certification Revenues	2,697,000	2,498,000	2,827,000	2,591,000	2,881,000	2,398,000	2,471,000	2,294,000	2,343,000
Total Revenues	\$86,280,000	\$94,494,000	\$99,847,000	\$98,720,000	\$101,187,000	\$105,232,000	\$113,995,000	\$118,983,000	\$128,792,000
Expenditures									
State Operations – Mill Expenditures ²²	48,514,000	50,514,000	54,948,000	59,001,000	59,689,000	60,167,000	55,983,000	62,611,000	67,417,000
State Operations – Registration Expenditures ²³	11,845,000	12,872,000	13,259,000	16,711,000	15,634,000	16,842,000	17,131,000	24,161,000	27,135,000
State Operations – Licensing & Certification Expenditures ²⁴	2,140,000	2,171,000	2,347,000	2,467,000	2,847,000	3,043,000	3,820,000	4,010,000	3,368,000
Local Operations – CAC Mill Distributions	25,343,000	26,664,000	27,054,000	29,079,000	28,611,000	29,109,000	33,470,000	33,519,000	34,686,000
Total Expenditures	\$87,842,000	\$92,221,000	\$97,608,000	\$107,258,000	\$106,781,000	\$109,161,000	\$110,404,000	\$124,301,000	\$132,606,000
Fund Balance	\$15,442,000	\$18,053,000	\$20,292,000	\$20,708,000	\$17,805,000	\$14,045,000	\$19,011,000	\$12,353,000	\$8,539,000
Net Activity	\$(1,562,000)	\$2,273,000	\$2,239,000	\$(8,538,000)	\$(5,594,000)	\$(3,929,000)	\$3,591,000	\$(5,318,000)	\$(3,814,000)

²¹ Includes small proportion of other revenues such as violations, delinquent fees, and interest.

²² Includes fund users and fund share of pro rata and supplemental pension obligations.

²³ Includes fund share of pro rata and supplemental pension obligations.

²⁴ Includes fund share of pro rata and supplemental pension obligations.

Appendix B: Funding Authority

Appendix B summarizes DPR's funding authority for its Pesticide Programs and Administration. The State's pesticide use laws are primarily codified within the California Food and Agricultural Code (FAC) Divisions 2, 6, and 7; the regulations are in Title 3, California Code of Regulations (3 CCR) Division 6. The laws and regulations include the requirements that support certification and licensing of individuals who make agricultural use recommendations and handle pesticides in the workplace, as well as the licensing of Pest Control Dealers and Pest Control Businesses.

Exhibit B-1 provides a summary of DPR's key mandates and legal authorities supporting funding for DPR's Pesticide Programs and Administration.

**Exhibit B-1
Key Mandates and Legal Authorities**

Codification	Name/Topic Area	Description
General		
FAC §11456	DPR's General Powers	Sets forth the general powers of the director to adopt regulations necessary to carry out the provisions of the code, conduct inspections, and issue licenses and certificates of registration.
FAC §11501	DPR's Statutory Purpose	Sets forth DPR's statutory purpose: to provide for the proper, safe, and efficient use of pesticides essential for production of food and fiber and the protection of public health and safety; to protect the environment by regulating and ensuring proper stewardship of pesticides; to regulate worker safety; to issue licenses and permits for pesticide use; to protect consumers; and to develop and encourage the use of integrated pest management.
FAC §11501.1	DPR's Authority over Pesticide Registration, Sale, and Use	Provides that DPR has authority over the registration, sale and use of pesticides and preempts any local regulation.
FAC §11501.5	DPR and County Agricultural Commissioners (CACs) Pesticide Enforcement Authority	Gives the DPR and the commissioner of each county under the direction and supervision of DPR the authority to enforce pesticide laws and regulations.
2 FAC §2281	County Agricultural Commissioners (CACs) Responsibilities	Provides that the county agricultural commissioners are responsible for the local administration of the pesticide enforcement program under the instructions and recommendations of the DPR's director.
FAC §12841.2	DPR Outreach	Requires DPR to create a program to conduct outreach and education activities for worker safety, environmental safety, school safety, and proper pesticide handling and use (relates to environmental justice).
Product Registration		
FAC §12811	Pesticide Registration	Requires all products to be registered following the requirements set forth in statute and regulation before they can be offered for sale in California.
FAC §12824	Pesticide Evaluation	Requires the director to evaluate pesticides using specified criteria set forth in statute and regulation prior to registration, and to develop an orderly program for the continuous evaluation of all pesticides registered.
FAC §12825	Pesticide Cancellation, Refusal	Provides authority to the director to cancel or refuse to register any pesticide after a hearing on the grounds specified.
Environmental and Human Health Risk Assessment		
FAC §11454.1	Pesticide Risk Assessment	Requires DPR to conduct pesticide risk assessment as appropriate to carry out its responsibilities under the code and requires the Office of Hazard Assessment to provide a scientific peer review as required by the Health and Safety Code.
FAC §13121-13135	Birth Defect Prevention Act	Gives DPR the authority to require registrants of new or already registered pesticides to submit specified studies related to birth defects and other health effects and to evaluate those studies and take appropriate action (cancellation, suspension, refusal to register).

Codification	Name/Topic Area	Description
FAC §13141-13152	Pesticide Contamination Prevention Act	Gives DPR the authority to require specified information about the potential of a pesticide to move to ground water, conduct ongoing monitoring, and establishes a process to evaluate and mitigate the use of any pesticide found to have polluted ground water as a result of legal agricultural use.
FAC §14004.5	Restricted Materials Criteria	Requires the director to evaluate and designate particularly hazardous pesticides as restricted materials based upon certain criteria.
FAC §14021-14027	Toxic Air Contamination (TAC statute)	Requires DPR to evaluate the health effects or pesticides emitted into the air and to determine if they should be listed as a toxic air contaminant and to then determine the need and degree of control measures. For TAC's already listed, to make a determination of the need and degree of control measures after the completion of a risk assessment. Control measures must be implemented within two years of the determination, or a report submitted to the legislature providing the reasons why this obligation has not been met.
Licensing and Certification		
FAC §11502 and 11502.5	Pest Control Licensing, Certification, and Continuing Education	Gives the director the authority to adopt regulations to govern the conduct of the business of pest control and to pass regulations related to minimum requirements, continuing education, and renewal. (required licenses: section 11701, pest control business; pest control advisor, section 12201; qualified applicator; section 12251, pest control dealer; section 12400, pesticide broker; section 14151, qualified applicator.)
Pesticide Use Reporting		
FAC §12979	Pesticide Use Reporting (PUR)	Requires the use of pesticides to be reported to the agricultural commissioner or to DPR as prescribed by the director (regulations and other sections require use reporting to the commissioner for all agricultural and structural pesticide use).
Restricted Material Use and Permitting		
FAC §14001	Restricted Materials	Requires DPR to regulate the use of restricted materials.
FAC §14005-14006	Restrict Material Authority	Gives the director the authority to adopt regulations to govern the possession and use of restricted material pesticides to protect the environment and human health
FAC §14006.5-14009	Restrict Material Permitting	Requires a permit from the commissioner before any application of an agricultural use restricted material pesticide and sets forth the process of issuance and the process to challenge the issuance or refusal to issue.
FAC §14010-14015	Restrict Material Safe, Purchase, and Use	Sets forth other requirements on sale, purchase and use of restricted materials.
Monitoring and Surveillance		
FAC §12532 and 12534	Pesticide Residue Monitoring Program	Requires DPR to conduct a pesticide residue monitoring program to prevent public exposure to illegal pesticide residues.
FAC §12824	Pesticide Evaluation Program	Requires DPR to develop an orderly program to continuously evaluate all registered pesticides. (3 Cal. Code Reg. section 6220-6226.)
FAC §12825.5	Pesticide Registrant Reporting	Requires registrants to report evidence of any adverse effect or risk of a pesticide to human health and the environment.

Codification	Name/Topic Area	Description
Mitigating Human Health Risks		
FAC §12824	Pesticide Restrictions	Requires DPR to eliminate from use any pesticides that endanger the agricultural or nonagricultural environment, to place restrictions on use, and to set up a program to continuously evaluate registered pesticides. It also provides the authority to request applicants and registrants to perform and submit studies needed to evaluate the specific pesticide product.
FAC §12981	Pesticide Worker Safety	Requires DPR to adopt regulations protecting worker safety, basing regulations related to health effects on the recommendations of the Office of Health Hazard Assessment (related sections include 12980-12988).
FAC §13129	Birth Defects Prevention Act Studies	Requires DPR to review health effects studies for possible birth defects or other health effects related to pesticide exposure and act if there is a significant adverse health risk (from Birth Defects Prevention Act, sections 13121-13135).
FAC §14005	Restricted Materials Use Conditions	Requires DPR to establish conditions for the use of restricted materials to mitigate the effects on human health and the environment (related section 14006.5 requires a permit before use).
FAC §14024	Pesticide Emission Control Measures	Requires DPR to develop control measures for pesticides designated as toxic air contaminants to reduce emissions so the public will not be exposed to levels that may cause significant adverse health effects.
Pesticide Management Programs		
FAC §13183	Voluntary Adoption of Integrated Pest Management (IPM) Programs for School sites	Requires DPR to promote and facilitate the voluntary adoption of integrated pest management (IPM) programs for school sites (related sections include sections 13180-13188).
FAC §13185	IPM Training in Schools and Day Cares	Requires DPR to establish an IPM training program for schools and day care facilities.
FAC §13186	Pesticide Use Reports by Schools	Requires the submission of pesticide use reports by schools (not applied by commercial applicators).
FAC §13186.5	Pesticide Application Training near Schools	Requires any individual applying pesticides at school sites (school personal and commercial applicators) to receive a training course in IPM and specific training unique to applying pesticides at school sites.
Illegal Residue		
FAC §12581	Illegal Pesticide Residue Inspection Authority	Grants DPR the authority to inspect produce packed, shipped, or sold in California for illegal pesticide residue.
FAC §12671	Excess Pesticide Residue	Prohibits the packing, shipping, or sale of any product carrying excess pesticide residue.
General Enforcement		
FAC §12991	Pesticide Sale, Purchase, and Handling	Generally, sets forth the unlawful acts related to the sale, purchase, and handling of pesticides (Division 7).
FAC §12996-13000.1	Pesticide Enforcement Violations	Sets forth the enforcement options for violations of Division 7 provisions and implementing regulations (criminal, civil, administrative) generally investigated and initiated by DPR at the state level.

Codification	Name/Topic Area	Description
FAC §12999.4	Pesticide Enforcement Violations	In lieu of civil prosecution, this section grants authority to DPR to administratively enforce violations for the sale of produce with illegal residues, misbranded pesticide products, and unregistered pesticide products.
FAC §11791 and 11792	Pesticide Use Violations	Generally, sets forth the unlawful acts related to pesticide use violations (Division 6).
FAC §11891-11894	Pesticide Enforcement Violations	Sets forth the enforcement options and penalties for violations of Division 6 and implementing regulations (criminal, civil, and administrative) generally investigated and initiated by the Commissioners at the local level.
FAC §12999.5	Pesticide Enforcement Violations	In lieu of civil prosecution, this section grants the commissioners the authority to administratively enforce pesticide use violations.
Product Compliance and Mill Assessment		
FAC §12841	Mill Assessment	Gives DPR the authority to collect a mill assessment on the first sale of a pesticide into or within California (related sections include 12841.1-12847).
FAC §12881-12885	Misbranded Pesticides	Defines what constitutes a misbranded pesticide (sale of which is a violation per section 12992).
FAC §12992	Misbranded Pesticides	Provides that it is unlawful to sell a misbranded pesticide product.
FAC §12993	Unregistered Pesticides	Provides that it is unlawful to sell an unregistered pesticide product.
FAC §12995	Unregistered Pesticides	Provides that it is illegal to possess or use a product that has not been registered by DPR.
Structural Pest Control		
FAC §15201	Structural Pest Control Board (SPCB) Authority	Gives joint responsibility to regulate activities or structural licensees to the Structural Pest Control Board, DPR, and the commissioners under the direction of the DPR.
BPC §8616 and 8614 (Business and Professions Code)	Inspections and Disciplinary Action	Designates DPR and the commissioners as the agents to conduct inspections and take any enforcement and disciplinary actions for violations as described in sections 8616.5, 8616.6, 8616.7, 8616.9, 8617.
BPC §8662	Disciplinary Review Committee	Sets up the Disciplinary Review Committee consisting of one member from DPR, one member from the Structural Pest Control Board, and one member from industry to hear appeals from structural administrative civil penalty actions taken by the commissioner.

Appendix C: Detailed Current Workload Activities by Branch

In **Exhibit C-1**, we provide a summary of current workload activities performed by branch within DPR’s Pesticide Programs and Administration. All branches perform general management, administration, and special project related workload in addition to the detailed workload activities identified within this Appendix. The information provided in this Appendix is intended to provide examples of the workload activities that flow into each of DPR’s authorized functions.

**Exhibit C-1
Detailed Summary of DPR Branch Workload Activities**

Branch	Detailed Workload Activities	
Pesticide Programs		
Enforcement Headquarters Branch	<ul style="list-style-type: none"> • Community Engagement/ Outreach/ Environmental Justice • Licensing Continuing Education • Licensing Study Guides Development/Revision • Licensing Exams Prep/Maintenance • Licensing Customer Service • Licensing Processing Renewals & New Applications • Licensing Specialized Application Reviews • Conduct Product Sales Inspections • Develop Legal Cases • Notification System • Research & Guidance on Enforcement Laws and Regs 	<ul style="list-style-type: none"> • Pesticide Sales and Use: Analysis, Tracking, Investigations • CAC Oversight and Evaluation • CAC Training and Exams • CAC California Pesticide Enforcement Activity Tracking System (CalPEATS) • Advising & Special Projects • Administer United States Environmental Protection Agency (EPA) Cooperative Agreement • California Pesticide Residue Monitoring Program (CPRMP) Activities • United States Department of Agriculture (USDA) Pesticide Data Programs • Pesticide Use Enforcement Cases and Data Reporting
Enforcement Regional Offices Branch	<ul style="list-style-type: none"> • Food Safety - California Residue • Food Safety - USDA Pesticide Data Program • Product Compliance Program • CAC Oversight and Evaluation • CAC Training 	<ul style="list-style-type: none"> • Cannabis Inspection and Compliance • CAC Training • Community Outreach • Structural Regulatory Training • Notification System
Environmental Monitoring Branch	<ul style="list-style-type: none"> • Registration Evaluation • Database Management • Monitoring/Surveillance 	<ul style="list-style-type: none"> • Modeling and Mitigation • Community Engagement/ Outreach/ Environmental Justice

Branch	Detailed Workload Activities	
Human Health Assessment Branch	<ul style="list-style-type: none"> • New Active/Major New Use Evaluation • Registered AI Evaluation • Registration Branch Consultation • Registrant Engagement • Peer Review • Residue Analysis • Rapid Evaluations of Human Risk • Subject matter expertise and consultation related to human health, exposure, and epidemiology • Toxicology and exposure analysis method development 	<ul style="list-style-type: none"> • Human exposure modeling • Risk Characterization Documents (RCD) • Human Exposure Assessment Documents (EAD) • Mitigation • Engagement/Outreach/ Environmental Justice • Advising & Special Projects • General Management & Administration
Integrated Pest Management Branch	<ul style="list-style-type: none"> • Integrated Pest Management (IPM) Grants Issuance & Management • Pesticide Use Reporting Data Analysis/Management • Healthy Schools Act Compliance Support • IPM for Endangered Species Protection 	<ul style="list-style-type: none"> • Translation for Branch and DPR Activities • General / Broad IPM Support • Technical Support to Core Activities • Notification System
Pesticide Evaluation Branch	<ul style="list-style-type: none"> • New Active/Major New Use Evaluation • Registered AI Evaluation • Registration Branch Consultation • Reevaluations • Registrant Engagement • Peer Review • Ecosystem Monitoring Contracts 	<ul style="list-style-type: none"> • Adverse Effects Reporting Evaluation • Inter-Regional Research Project Number Four (IR-4) Research Authorizations • Advising & Special Projects • Engagement/Outreach/ Environmental Justice • Rulemaking and Policy Development
Pesticide Programs Division	<ul style="list-style-type: none"> • Science Policy Oversight • Regulation Development • Division Management/Oversight • Contract Oversight and Management 	<ul style="list-style-type: none"> • CAC Consultation/Liaison • Cannabis/Hemp Outreach and Enforcement • Emergency Response Management Committee (ERMAC)

Branch	Detailed Workload Activities	
Pesticide Registration Branch	<ul style="list-style-type: none"> • Register pesticide products and devices (process, track, and license) • Coordinate evaluation process (internally and externally) • Primary liaison to registrants • Prepare public notices and issues notices of decision and public reports for registration decisions • Respond to public comments on registration decisions • Correspond with registrants • Conduct extensive label review • Ensure appropriate scientific data is submitted to support registration or amendment • Ensure compliance with federal and state pesticide laws and regulations 	<ul style="list-style-type: none"> • Issue Special Local Need registrations and Emergency Exemptions from registration • Manage all data received, oversees call-ins of data on environmental fate and acute and chronic toxicology • Maintain official label files and the pesticide data volume archive • Coordinate annual renewals of pesticides • Coordinate and track reevaluations, human health risk assessments, and risk mitigation requirements • Review and process adverse effects disclosures • Provide information on registered pesticides and label instructions to pesticide enforcement agencies and the public.
Worker Health and Safety Branch	<ul style="list-style-type: none"> • Field studies/Monitoring and observation • Provide Continued Education (CE) Presentations/Trainings on rules and regulations • Industrial hygiene consultations • Data analysis, research, and report development • Mitigation development • Outreach and education (training and presentations) • Pesticide illness evaluation/review 	<ul style="list-style-type: none"> • Aid CACs on investigations of hazardous work conditions • Train-the-Trainer (T2) program and instructor reviews and course audits • Worker Protection Program • Field Studies (Active - Soil Fume, Phosphine; in development - Quaternary Ammonium Compounds (QACs)) • Development of outreach material (based on PISP data) • Medical Supervision Program
Administration		
Director's Office	<ul style="list-style-type: none"> • Enforcement and Licensing • Litigation • Public Records Act (PRA) requests, Subpoenas, B-K Compliance • Contracts / Grants / IT Support • CAC Engagement • Regulations & Legislation • California Environmental Quality Act (CEQA) Compliance • Notification System 	<ul style="list-style-type: none"> • HR Support • Advising & Special Projects • Legislative Strategy, Engagement and Analysis • Policy • Personnel, including Equal Opportunity Employment and Ethics • Media Requests and Communications Support • Community Engagement/ Outreach/Environmental Justice
Fiscal, Audits, and Business Services Branch	<ul style="list-style-type: none"> • Cashiering • Accounts Payable • Budgeting • Accounts Receivable • MillPay Administration • Compliance Follow-up 	<ul style="list-style-type: none"> • Control Agency/Stakeholder Response • Budget Management & Administration • Auditing • Contracts / Procurement • Telecommunications • Facilities / Fleet

Branch	Detailed Workload Activities	
Information Technology Branch	<ul style="list-style-type: none"> • Information Security • Maintenance & Operations • Enterprise Compliance • Legislation / Policy • Business Analysis • Project Management • Network and System Administration • Hardware and Software Support 	<ul style="list-style-type: none"> • Data Center Management • Agency Shared Service Workload • IT Roadmap and Related Projects • Procurement • Analysis / Coding / Testing • Telecommunications/VoIP • Web Support and Accessibility • Contract Management
Human Resources Branch	<ul style="list-style-type: none"> • Equal Employment Opportunity (EEO) • Labor Relations • Performance Management • Diversity, Equity, Inclusion (DEI) • Employee Engagement • Hiring/Exams • Recruitment • Transactions/Payroll/Benefits • State Leadership Accountability Act (SLAA) • Administrative Directives 	<ul style="list-style-type: none"> • Health and Safety • Telework • Training • Conflict of Interest • On-boarding/Separations • Department of Motor Vehicles (DMV) Program • Bilingual Program • Operational Planning • Continuity of Operations (COOP) • Internal Audits • Employee Recognition

Appendix D: Summary of Position Classifications

Exhibit D-1 summarizes the position classification title and average salaries Crowe utilized to calculate DPR’s unbudgeted core and SPM programmatic needs, as detailed in *Section 4* of the report. Crowe referenced the California Department of Human Resources (CalHR) sources to obtain this information.

Exhibit D-1
Summary of Positions Classifications – Minimum, Max, and Average Monthly Salaries

Abbreviation	Position Classification Title	Min	Max	Average
A	Attorney	6,979.00	10,572.00	8,775.50
AAA	Associate Accounting Analyst	5,793.00	7,472.00	6,632.50
AAE	Associate Agricultural Economist	5,518.00	6,907.00	6,212.50
AAll	Administrative Assistant II	5,383.00	6,739.00	6,061.00
AAll	Administrative Assistant II	5,518.00	7,116.00	6,317.00
ABMA	Associate Business Management Analyst	5,518.00	7,116.00	6,317.00
AGPA	Associate Government Program Analyst	5,518.00	7,716.00	6,617.00
AI	Auditor I	3,800.00	5,000.00	4,400.00
AIH	Associate Industrial Hygienist	6,684.00	9,128.00	7,906.00
AIII	Attorney III	9,976.00	12,798.00	11,387.00
AIV	Attorney IV	11,020.00	14,149.00	12,584.50
AMA	Associate Management Auditor	6,082.00	8,240.00	7,161.00
AO (Spec)	Accounting Officer (Specialist)	4,819.00	6,214.00	5,516.50
AT (Acc, Tech)	Accounting Technician	3,308.00	4,269.00	3,788.50
AT (Acc, Train)	Accountant Trainee	4,065.00	4,992.00	4,528.50
AT (Tox)	Associate Toxicologist	6,512.00	8,093.00	7,302.50
BSOI (Spec)	Business Service Officer I (Specialist)	4,476.00	5,604.00	5,040.00
CC	Chief Counsel	14,339.00	15,974.00	15,156.50
CDD	Chief Deputy Director	14,339.00	15,975.00	15,157.00
CEA	C.E.A.	7,781.00	18,850.00	13,315.50
DLP	Director of Legislation and Policy	10,546.00	11,755.00	11,150.50
EPMI (Super)	Environmental Program Manager I (Supervisory)	11,315.00	14,066.00	12,690.50
EPMII	Environmental Program Manager II	13,132.00	14,918.00	14,025.00
ES	Environmental Scientist	4,145.00	7,926.00	6,035.50
GAll	General Auditor II	4,936.00	6,489.00	5,712.50
GAllI	General Auditor III	5,934.00	7,803.00	6,868.50
IO (Spec)	Information Officer I (Specialist)	5,383.00	6,739.00	6,061.00
ITA	Information Technology Associate	4,516.00	8,240.00	6,378.00
ITMI	Information Technology Manager I	8,381.00	11,231.00	9,806.00
ITMII	Information Technology Manager II	10,167.00	12,359.00	11,263.00
ITSI (Spec)	Information Technology Specialist I	5,960.00	9,931.00	7,945.50
ITSI (Super)	Information Technology Supervisor I	6,907.00	9,255.00	8,081.00
ITSII (Spec)	Information Technology Specialist II	7,893.00	10,894.00	9,393.50
ITSII (Super)	Information Technology Supervisor II	7,593.00	10,174.00	8,883.50

Abbreviation	Position Classification Title	Min	Max	Average
ITSIII (Spec)	Information Technology Specialist III	8,488.00	11,375.00	9,931.50
ITT	Information Technology Technician	3,691.00	4,944.00	4,317.50
LA	Legal Analyst	4,701.00	5,885.00	5,293.00
MST	Management Services Technician	3,054.00	3,825.00	3,439.50
OT (General)	Office Technician (General)	3,308.00	4,269.00	3,788.50
OT (Type)	Office Technician (Typing)	3,287.00	4,114.00	3,700.50
PS	Personnel Specialist	3,513.00	5,823.00	4,668.00
PSI (Super)	Personnel Supervisor I	4,842.00	6,061.00	5,451.50
PT	Program Technician	2,846.00	3,824.00	3,335.00
PTII	Program Technician II	3,291.00	4,124.00	3,707.50
PTIII	Program Technician III	3,682.00	4,613.00	4,147.50
RDSI	Research Data Specialist I	6,061.00	7,817.00	6,939.00
RDSII	Research Data Specialist II	6,658.00	8,583.00	7,620.50
RDSIII	Research Data Specialist III	7,315.00	9,430.00	8,372.50
RSI (E/B)	Research Scientist I (Epidemiology/Biostatistics)	6,512.00	8,093.00	7,302.50
RSII (Chem)	Research Scientist II (Chemical Sciences)	7,152.00	8,889.00	8,020.50
RSII (E/B)	Research Scientist II (Epidemiology/Biostatistics)	7,152.00	8,889.00	8,020.50
RSIII	Research Scientist III	7,811.00	9,777.00	8,794.00
RSIII (Chem)	Research Scientist III (Chemical Sciences)	7,811.00	9,777.00	8,794.00
RSIII (P/E)	Research Scientist III (Physical/Engineering Sciences)	7,811.00	9,777.00	8,794.00
RSIV (P/E)	Research Scientist IV (Physical/Engineering Sciences)	8,980.00	11,242.00	10,111.00
SAA (Acc Systems)	Senior Administrative Analyst -Accounting Systems-	7,028.00	8,732.00	7,880.00
SciAid	Scientific Aid	2,717.87	3,224.00	2,970.93
SES (Spec)	Senior Environmental Scientist (Specialist)	7,336.00	9,126.00	8,231.00
SES (Super)	Senior Environmental Scientist (Supervisory)	9,785.00	12,165.00	10,975.00
SI	Special Investigator	5,045.00	5,965.00	5,505.00
SIH	Senior Industrial Hygienist	9,583.00	12,805.00	11,194.00
SMA (Senior)	Senior Management Auditor	7,379.00	9,629.00	8,504.00
SMA (Staff)	Staff Management Auditor	6,723.00	8,770.00	7,746.50
SPTIII	Supervising Program Technician III	4,232.00	5,303.00	4,767.50
SSA	Staff Services Analyst	3,534.00	5,916.00	4,725.00
SSMI	Staff Services Manager I	6,403.00	7,954.00	7,178.50
SSMII (Super)	Staff Services Manager II (Supervisory)	7,028.00	8,732.00	7,880.00
SSMIII	Staff Services Manager III	8,545.00	9,702.00	9,123.50
ST	Supervising Toxicologist	12,878.00	14,624.00	13,751.00
ST (Tox, Senior)	Senior Toxicologist	11,646.00	14,478.00	13,062.00
ST (Tox, Spec)	Staff Toxicologist (Specialist)	8,630.00	10,751.00	9,690.50
ST (Tox, Super)	Staff Toxicologist (Supervisor)	8,765.00	10,923.00	9,844.00
TOI	Training Officer I	5,518.00	6,907.00	6,212.50