

Solutions for an Efficient and Effective Federal Permitting Workforce

By FAS

The United States faces urgent challenges related to aging infrastructure, vulnerable energy systems, and economic competitiveness. Improving American competitiveness, security, and prosperity depends on private and public stakeholders' ability to responsibly site, build, and deploy critical energy and infrastructure. Unfortunately, these projects face **one common bottleneck: permitting**.

Permits and authorizations are required for the use of land and other resources under a series of laws, such as the National Environmental Policy Act (NEPA), the Endangered Species Act (ESA), and National Historic Preservation Act of 1966. However, [recent court rulings](#) and the [Trump Administration's executive actions](#) have brought uncertainty and promise major disruption to the status quo. The Executive Order (EO) on *Unleashing American Energy* mandates guidance to agencies on permitting processes be expedited and simplified within 30 days, requires agencies prioritize efficiency and certainty over any other objectives, and revokes the Council of Environmental Quality's (CEQ) authority to issue binding NEPA regulations. While these changes aim to advance the speed, efficiency, and certainty of permitting, the impact will ultimately depend on implementation by the permitting workforce.

Unfortunately, the **permitting workforce is unprepared to swiftly implement changes following shifts in environmental policy and regulations**. Teams responsible for permitting have historically been understaffed, overworked, and unable to complete their project backlogs, while demands for permits have increased significantly in recent years. Building workforce capacity is critical for efficient and effective federal permitting.

Project Overview

Our team at the Federation of American Scientists (FAS) has spent 18 months studying and working to build government capacity for permitting talent. The Inflation Reduction Act (IRA) provided resources to expand the federal permitting workforce, and we partnered with the Permitting Council, which [serves as a central body to improve the transparency, predictability, and accountability of the federal environmental review](#)

[and authorization process](#), to gain a cross-agency understanding of the hiring challenges experienced in permitting agencies and prioritize key challenges to address. Through two co-hosted webinars for hiring managers, HR specialists, HR leaders, and program leaders within permitting agencies, we shared tactical solutions to improve the hiring process.

We complemented this understanding with voices from agencies (i.e., hiring managers, HR specialists, HR teams, and leaders) by [conducting interviews to identify new issues, best practices, and successful strategies for building talent capacity](#). With this understanding, we developed **long-term solutions to build a sustainable, federal permitting workforce** for the future. While many of our recommendations are focused on permitting talent specifically, our work naturally uncovered challenges within the broader federal talent ecosystem. As such, we've included recommendations to **advance federal talent systems and improve federal hiring**.

Problem

Building permitting talent capacity across the federal government is not an easy endeavor. There are many stakeholders involved across different agencies with varying levels of influence who need to play a role: the Permitting Council staff, the Permitting Council members-represented by Deputy Secretaries (Deputy Secretaries) of permitting agencies, the Chief Environmental Review and Permitting Officers (CERPOs) in each agency, the Office of Personnel and Management (OPM), the Chief Human Capital Officer (CHCO) in each permitting agency, agency HR teams, agency permitting teams, hiring managers, and HR specialists. Permitting teams and roles are widely dispersed across agencies, regions, states, and programs. The role each agency plays in permitting varies based on their mission and responsibilities, and there are many silos within the broader ecosystem. Few have a holistic view of permitting activities and the permitting workforce across the federal government.

With this complex network of actors, one challenge that arises is a lack of standardization and consistency in both roles and teams across agencies. If agencies are looking to fill specialized roles unique to one permitting need, it means that there will be less opportunity for collaboration and for building efficiencies across the ecosystem. The federal hiring process is challenging, and there are many known bottlenecks that cause delays. If agencies don't leverage opportunities to work together, these bottlenecks will multiply, impacting staff who need to hire and especially permitting and/or HR teams who are understaffed, which is not uncommon.

Additionally, building applicant pools to have access to highly qualified candidates is time consuming and not scalable without more consistency.

Tracking workforce metrics and hiring progress is critical to informing these talent decisions. Yet, the tools available today are insufficient for understanding and identifying gaps in the federal permitting workforce. The uncertainty of long-term, sustainable funding for permitting talent only adds more complexity into these talent decisions. While there are many challenges, we have identified solutions that stakeholders within this ecosystem can take to build the permitting workforce for the future.

There are six key recommendations for addressing permitting workforce capacity outlined in the table below. Each is described in detail with corresponding actions in the *Solutions* section that follows. Our recommendations are for the Permitting Council staff, Deputy Secretaries, CERPOs, OPM, CHCOs, OMB, and Congress.

High-level Recommendations

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| <p>1 <u>Enhance the Permitting Council’s Authority to Improve Processes and Workforce Collaboration</u></p> | <p>Congress needs to give the Permitting Council staff greater authority to standardize permitting practices, direct better permitting outcomes, and serve as a central authority for mandating permitting performance.</p> |
| <p>2 <u>Build Efficient Permitting Teams and Standardize Roles</u></p> | <p>The Permitting Council staff, Deputy Secretaries, CERPOs, OMB, and the CHCO Council should improve the performance and consistency of permitting processes by establishing standards in permitting team roles and configurations to support cross-agency collaboration and drive continuous improvements.</p> |
| <p>3 <u>Improve Workforce Strategy, Planning, and Decisions through Quality Workforce Metrics</u></p> | <p>OPM, OMB, the CHCO Council, and Permitting Council staff need to accurately gather and report on hiring metrics for talent surges and workforce metrics by domain.</p> |
| <p>4 <u>Invest in Professional Development and Early Career Pathways</u></p> | <p>The Permitting Council staff, Deputy Secretaries, and CERPOs should create more development opportunities and early career pathways for civil servants.</p> |
| <p>5 <u>Improve and Invest in Pooled Hiring for Common Positions</u></p> | <p>OPM, CHCOs, OMB, Permitting Council staff, Deputy Secretaries, and CERPOs should improve and make joint announcements, shared position descriptions, assessments, and certificates of eligibles for common positions a standard practice.</p> |

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| <p>6 Improve Human Resources Support for Hiring Managers</p> | <p>The CHCO Council, OPM, CERPOs, and the Permitting Council staff need to test new HR resourcing models to implement hiring best practices and offer additional support to hiring managers.</p> |
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Solutions

The six solutions described below include an explanation of the problem and key actions our signal stakeholders (Permitting Council staff, Deputy Secretaries, CERPOs, OPM, CHCOs, OMB, and Congress) can take to build permitting workforce capacity. The table in the appendix specifies the stakeholders responsible for each recommendation.

Enhance the Permitting Council’s Authority to Improve Permitting Processes and Workforce Collaboration

Permitting process, performance, and talent management cut across agencies and their bureaus—but their work is often disaggregated by agency and sub-agency, leading to inefficient and unnecessarily discrete practices. While the Permitting Council plays a critical coordinating role, it lacks the authority and accountability to direct and guide better permitting outcomes and staffing. There is no central authority for influencing and mandating permitting performance. Agency-level CERPOs vary widely in their authority, whereas the Permitting Council is uniquely positioned for this role. Choosing to overlook this entity will lead to another interagency workaround. **Congress needs to give the Permitting Council staff greater authority to improve permitting processes and workforce collaboration.**

- a. **Enhance Permitting Council Authority for Improved Performance:** Enhance provisions in FAST-41 and IRA by passing legislation that empowers the Permitting Council staff to create and enforce consistent performance criteria for permitting outcomes, permitting process metrics, permitting talent acquisition, talent management, and permitting teams KPIs.
- b. **Enhance Permitting Council Authority for Interagency Coordination:** Empower the Permitting Council staff to manage interagency coordination and collaboration for defining permitting best practices, establishing frameworks for permitting, and reinforcing those frameworks across agencies. Clarify the roles and responsibilities between Permitting Council staff, Deputy Secretaries, CERPOs, and the Council on Environmental Quality (CEQ).

- c. **Assign Responsibility for Tracking Changes and Providing Guidance for Permitting Practices:** Assign the Permitting Council staff in coordination with OMB responsibility for tracking changes and providing guidance on permitting practices in response to recent and ongoing court rulings that change how permitting outcomes are determined (e.g., Loper Bright/Chevron Deference, CEQ policies, etc.).
- d. **Provide Permitting Council staff with Consistent Funding:** Either renew components of [IRA and/or IJJA](#) funding that enables the Council to invest in agency technologies, hiring, and workforce development, or provide consistent appropriations for this.
- e. **Enhance CERPO Authority and Position CERPOs for Agency-Wide and Cross-Agency Permitting Actions:** Expand CERPO authority beyond the FAST-41 Act to include all permitting work within their agency. Through legislation, policy, and agency-level reporting relationships (e.g., CERPO roles assigned to the Secretary’s office), provide CERPOs with clear authority and accountability for permitting performance.

Build Efficient Permitting Teams and Standardize Roles

In [our research](#), we interviewed one program manager who restructured their team to drive efficiency and support continuous improvement. However, this is not common. Rather, there is a lack of standardization in roles engaged in permitting teams within and across agencies, which hinders collaboration and prevents efficiencies. This is likely driven by the different roles played by agencies in permitting processes. These variances are in opposition to shared certifications and standardized job descriptions, complicate workforce planning, hinder staff training and development, and impact report consistency. **The Permitting Council staff, Deputy Secretaries, CERPOs, OMB, and the CHCO Council should improve the performance and consistency of permitting processes by establishing standards in permitting team roles and configurations to support cross-agency collaboration and drive continuous improvements.**

- a. **Characterize Types of Permitting Processes:** Permitting Council staff should work with Deputy Secretaries, CERPOs, and Permitting Program Team leaders to categorize types of permitting processes based on project “footprint”, complexity, regulatory reach (i.e., regulations activated), populations affected and other criteria. Identify the range of team configurations in use for the categories of processes.

- b. **Map Agency Permitting Roles:** Permitting Council staff should map and clarify the roles played by each agency in permitting processes (e.g., sponsoring agency, contributing agency) to provide a foundation for understanding the types of teams employed to execute permitting processes.
- c. **Research and Analyze Agency Permitting Staffing:** Permitting Council staff should collaborate with OMB to conduct or refine a data call on permitting staffing. Analyze the data to compare the roles and team structures that exist between and across agencies. Conduct focus groups with cross agency teams to identify consistent talent needs, team functions, and opportunities for standardization.
- d. **Develop Permitting Team Case Studies:** Permitting Council staff should conduct research to develop a series of case studies that highlight efficient and high performing permitting team structures and processes.
- e. **Develop Permitting Team Models:** In collaboration with Deputy Secretaries and CERPOs, Permitting Council staff should develop team models for different agency roles (i.e., sponsor, lead agency, coordinating agency) that focus on driving efficiencies through process improvements and technology, and develop guidelines for forming new permitting teams.
- f. **Create Permitting Job Personas:** In collaboration with Deputy Secretaries and CERPOs, Permitting Council staff should develop personas to showcase the roles needed on each type of permitting team and roles, recognizing that some variance will always remain, and the type of hiring authority that should be used to acquire those roles (e.g., [IPA for highly specialized needs](#)). This should also include new roles focused on process improvements; [technology and data acquisition, use, and development](#); and [product management](#) for efficiency, improved customer experience, and effectiveness.
- g. **Define Standardized Permitting Roles and Job Analyses:** With the support of Deputy Secretaries and CERPOs, Permitting Council staff should identify roles that can be standardized across agencies based on the personas, and collaborate with permitting agencies to develop standard job descriptions and job analyses.
- h. **Develop Permitting Practice Guide:** In collaboration with Deputy Secretaries and CERPOs, Permitting Council staff should develop a primer on federal permitting practices that explains how to efficiently and effectively complete permitting

activities.

- i. **Place Organizational Strategy Fellows:** Permitting Council staff should hire at least one fellow to their staff to lead this effort and coordinate/liaise between permitting teams at different agencies.
- j. **Mandate Permitting Hiring Forecasts:** Permitting Council staff should collaborate with the CHCO Council to mandate permitting hiring forecasts annually with quarterly updates.
- k. **Revise Permitting Funding Requirements:** Permitting Council staff should include requirements for the adoption of new team models and roles in the resources and coordination provided to permitting agencies to drive process efficiencies.

Improve Workforce Strategy, Planning, and Decisions through Quality Workforce Metrics
 Agency permitting leaders and those working across agencies do not have the information to make informed workforce decisions on hiring, deployment, or workload sharing. Attempts to access accurate permitting workforce data highlighted inefficient methods for collecting, tracking, and reporting on workforce metrics across agencies. This results in a lack of transparency into the permitting workforce, data quality issues, and an opaque hiring progress. With these unknowns, it becomes difficult to prioritize agency needs and support. Permitting provided a purview into this challenge, but it is not unique to the permitting domain. **OPM, OMB, the CHCO Council, and Permitting Council staff need to accurately gather and report on hiring metrics for talent surges and workforce metrics by domain.**

- a. **Establish Permitting Workforce Data Standards:** OPM should create minimum data standards for hiring and expand existing data standards to include permitting roles in employee records, starting with the Request for Personnel Action that initiates hiring (SF52). Permitting Council staff should be consulted in defining standards for the permitting workforce.
- b. **Mandate Agency Data Sharing:** OPM and OMB should require agencies share personnel action data; this should be done automatically through APIs or a weekly data pull between existing HR systems. To enable this sharing, agencies must centralize and standardize their personnel action data from their components.

- c. **Create Workforce Dashboards:** OPM should create domain-specific workforce dashboards based on most recent agency data and make it accessible to the relevant agencies. This should be done for the permitting workforce.
- d. **Mandate Permitting Hiring Forecasts:** The CHCO Council should mandate permitting hiring forecasts annually with quarterly updates. This data should feed into existing agency talent management/acquisition systems to track workforce needs and support adaptive decision making.

Invest in Professional Development and Early Career Pathways

There are few early career pathways and development opportunities for personnel who engage in permitting activities. This limits agencies’ workforce capacity and extends learning curves for new staff. This results in limited applicant pools for hiring, understaffed permitting teams, and limited access to expertise. More recently, many of the roles permitting teams hired for were higher level GS positions. With a greater focus on early career pathways and development, future openings could be filled with more internal personnel. In [our research](#), one hiring manager shared how they established an apprenticeship program for early career staff, which has led 12 interns to continue into permanent federal service positions. **The Permitting Council staff, Deputy Secretaries, and CERPOs should create more development opportunities and early career pathways for civil servants.**

- a. **Invest in Training to Upskill and Reskill Staff:** The Permitting Council staff should continue investing in training and development programs (i.e., Permitting University) to upskill and reskill federal employees in critical permitting skills and knowledge. Leveraging the knowledge gained through creating standard permitting team roles and collaborating with permitting leaders, the Permitting Council staff should define critical knowledge and skills needed for permitting and offer additional training to support existing staff in building their expertise and new employees in shortening their learning curve.
- b. **Allocate Permitting Staff Across Offices and Regions:** CERPOs and Deputy Secretaries should implement a flexible staffing model to reallocate staff to projects in different offices and regions to build their experience and skill set in key areas, where permitting work is anticipated to grow. This can also help alleviate capacity constraints on projects or in specific locations.
- c. **Invest in Flexible Hiring Opportunities:** CERPOs and Deputy Secretaries should invest in a range of flexible hiring options, including 10-year STEM term

appointments and other temporary positions, to provide staffing flexibility depending on budget and program needs. Additionally, OPM needs to redefine STEM to include technology positions that do not require a degree (e.g., Environmental Protection Specialists).

- d. **Establish a Permitting Apprenticeship:** The Permitting Council staff should establish a 1-year apprenticeship program for early career professionals to gain on-the-job experience and learn about permitting activities. The apprenticeship should focus on common roles shared across agencies and place talent into agency positions. A rotational component could benefit participants in experiencing different types of work.

Improve and Invest in Pooled Hiring for Common Positions

Outdated and inaccurate job descriptions slow down and delay the hiring process. Further delays are often caused by the use of non-skills-based assessments, often self-assessments, which reduce the quality of the certificate list, or the list of eligible candidates given to the hiring manager. HR leaders confront barriers in the authority they have to share job announcements, position descriptions (PDs), classification determinations, and certificate lists of eligible candidates (Certs). Coupled with the above ideas on creating consistency in permitting teams and roles and better workforce data, **OPM, CHCOs, OMB, Permitting Council staff, Deputy Secretaries, and CERPOs should improve and make joint announcements, shared position descriptions, assessments, and certificates of eligibles for common positions a standard practice.**

- a. **Provide CHCOs the Delegated Authority to Share Announcements, PDs, Assessments, and Certs:** OPM and OMB should lower the barriers for agencies to share key hiring elements and jointly act on common permitting positions by delegating the authority for CHCOs to work together within and across their agencies, including with the Permitting Council staff.
- b. **Revise Shared Certificate Policies:** OPM and OMB should revise shared certificate policies to allow agencies to share certificates regardless of locations designated in the original announcement and the type of hire (temporary or permanent). They should require skills-based assessments in all pooled hiring. Additionally, OPM should streamline and clarify the process for sharing certificates across agencies. Agencies need to understand and agree to the process for selecting candidates off the certificate list.

- c. **Create a Government-wide Platform for Permitting Hiring Collaboration:** OPM should create a platform to gather and disseminate permitting job announcements, PDs, classification determinations, job/competency evaluations, and cert. lists to support the development of consistent permitting teams and roles.
- d. **Pilot Sharing of Announcements, PDs, Assessments, and Certs for Common Permitting Positions:** OPM and the CHCO Council should collaborate with the Permitting Council staff to select most common and consistent permitting team roles (e.g., Environmental Protection Specialist) to pilot sharing within and across agencies.
- e. **Track Permitting Hiring and Workforce Performance through Data Sharing and Dashboards:** Permitting Council staff, Deputy Secretaries, and CERPOs should leverage the metrics (see *Improve Workforce Decisions Through Quality Workforce Metrics*) and data actions above to track progress and make adjustments for sharing permitting hiring actions.
- f. **Incorporate Shared Certificates into Performance:** OPM and the CHCO Council should incorporate the use of shared certificates into the performance evaluations of HR teams within agencies.

Improve Human Resources Support for Hiring Managers

Hiring managers lack sufficient support in navigating the hiring and recruiting process due to capacity constraints. This causes delays in the hiring process, restricts the agency's recruiting capabilities, limits the size of the applicant pools, produces low quality candidate assessments, and leads to offer declinations. **The CHCO Council, OPM, CERPOs, and the Permitting Council staff need to test new HR resourcing models to implement hiring best practices and offer additional support to hiring managers.**

- a. **Develop HR Best Practice Case Studies:** OPM should conduct research to develop a series of case studies that highlight HR best practices for recruitment, performance management, hiring, and training to share with CHCOs and provide guidance for implementation.
- b. **Document Surge Hiring Capabilities:** In collaboration, the Permitting Council staff and CERPOs should document successful surge hiring structures (e.g., strike teams), including how they are formed, how they operate, what funding is required, and where they sit within an organization, and plan to replicate them

for future surge hiring.

- c. **Create Hiring Manager Community of Practice:** In collaboration, the Permitting Council staff and Permitting Agency HR Teams with support from the CHCO Council should convene a permitting hiring manager community of practice to share best practices, lessons learned, and opportunities for collaboration across agencies. Participants should include those who engage in hiring, specifically permitting hiring managers, HR specialists, and HR leaders.
- d. **Develop Permitting Talent Training for HR:** OPM should collaborate with CERPOs to create a centralized training for HR professionals to learn how to hire permitting staff. This training could be embedded in the Federal HR Institute.
- e. **Contract HR Support for Permitting:** The Permitting Council staff should create an omnibus contract for HR support across permitting agencies and coordinate with OPM to ensure the resources are allocated based on capacity needs.
- f. **Establish HR Strike Teams:** OPM should create a strike team of HR personnel that can be detailed to agencies to support surge hiring and provide supplemental support to hiring managers.
- g. **Place a Permitting Council HR Fellow:** The Permitting Council should place an HR professional fellow on their staff to assist permitting agencies in shared certifications and build out talent pipelines for the key roles needed in permitting teams.
- h. **Establish Talent Centers of Excellence:** The CHCO Council should mandate the formation of a Talent Center of Excellence in each agency, which is responsible for providing training, support, and tools to hiring managers across the agency. This could include training on hiring, hiring authorities, and hiring incentives; recruitment network development; career fair support; and the development of a system to track potential candidates.

Next Steps

These recommendations aim to address talent challenges within the federal permitting ecosystem. As you can see, these issues cannot be addressed by one stakeholder, or even one agency, rather it requires effort from stakeholders across government.

Collaboration between these stakeholder groups will be key to realizing sustainable permitting workforce capacity.

Appendix

Recommendations	Stakeholders						
	Permitting Council Staff	Permitting Council Deputy Secretaries	CERPO	OPM	CHCO	OMB	Congress
1 Enhance the Permitting Council's Authority to Improve Permitting Processes and Workforce Collaboration							●
1a Enhance Permitting Council Authority for Improved Performance	●						●
1b Enhance Permitting Council Authority for Interagency Coordination	●						●
1c Assign Responsibility for Tracking and Implementing Changes to Permitting Practices	●						●
1d Provide Permitting Council Staff with Consistent Funding	●						●
1e Enhance CERPO Authority and Position CERPOs for Agency-Wide and Cross-Agency Permitting Actions	●						●
2 Build Efficient Permitting Teams and Standardize Roles							●
2a Characterize Types of Permitting Processes	●	●	●		●		
2b Map Agency Permitting Roles	●						
2c Research and Analyze Agency Permitting Staffing	●						●
2d Develop Permitting Team Case Studies	●						
2e Develop Permitting Team Models	●						
2f Create Permitting Job Personas	●						
2g Define Standardized Permitting Roles and Job Analyses	●	●	●				
2h Develop Permitting Practice Guide	●	●	●				
2i Place Organizational Strategy Fellows	●						
2j Mandate Organizational Hiring Forecasts	●						●
2k Revise Permitting Funding Requirements	●						
3 Improve Workforce Decisions through Quality Workforce Metrics							●
3a Establish Permitting Workforce Data Standards	●			●	●	●	
3b Mandate Agency Data Sharing				●	●	●	
3c Create Workforce Dashboards							●
3d Mandate Permitting Hiring Forecasts							●
4 Invest in Professional Development and Early Career Pathways							●
4a Invest in Training to Upskill and Reskill Staff	●		●				
4b Allocate Permitting Staff Across Offices and Regions		●	●				
4c Invest in Flexible Hiring Opportunities		●	●				
4d Establish a Permitting Apprenticeship	●		●				
5 Improve and Invest in Pooled Hiring for Common Positions							●
5a Provide CHCOs the Delegated Authority to Share Announcements, PDS, Assessments, and Certs		●	●	●	●	●	●
5b Revise Shared Certificate Policies				●	●	●	●
5c Create a Government-wide Platform for Permitting Hiring Collaboration				●	●	●	●
5d Pilot Sharing of Announcements, PDS, Assessments, and Certs for Common Permitting Positions	●	●	●	●	●	●	●
5e Track Permitting Hiring and Workforce Performance through Data Sharing and Dashboards	●	●	●	●	●	●	●
5f Incorporate Shared Certificates into Performance				●	●	●	●
6 Improve Human Resources Support for Hiring Managers							●
6a Develop HR Best Practice Case Studies	●		●	●	●	●	●
6b Document Surge Hiring Capabilities	●		●	●	●	●	●
6c Create Hiring Manager Community of Practice	●		●	●	●	●	●
6d Develop Permitting Talent Training for HR			●	●	●	●	●
6e Contract HR Support for Permitting	●			●	●	●	●
6f Establish HR Strike Teams				●	●	●	●
6g Place a Permitting Council HR Fellow	●						
6h Establish Talent Centers of Excellence							●