



CTAG

Certification & Training Assessment Group — National Partnerships for Safe & Effective Pesticide Management through Education, Training & Competency Assessment

Pesticide Applicator Recertification: Examples of Including Both Core and Category Topics

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The question, “What makes a good recertification offering?” is a many-faceted question. The answer in large part depends on the responder. The primary goal of recertification offerings may differ for a trainer who provides information and education, a regulator who grants approval and uses recertification as a tool to qualify persons for a certification or license to apply pesticides and a consumer attending recertification.

While the criteria for proficiency of certified pesticide applicators are clearly specified in Title 40 of the Code of Federal Regulations sections 171.4 & 171.5 (Pesticide Applicator Certification), there are no criteria defined for the content and evaluation of pesticide applicator recertification programs. Effective training is very important to a pesticide recertification program, but what are the key elements to a sound and effective program? To assist those who provide and manage pesticide applicator recertification programs, CTAG developed the following guidance documents:

- *Pesticide Applicator Recertification: Verifying Attendance at Training Events*
- *Pesticide Applicator Recertification: Content Criteria*
- *Pesticide Applicator Recertification: Online Training – Course Design and Structure*
- *Pesticide Applicator Recertification: Evaluation of Recertification Programs*
- *Pesticide Applicator Recertification: Addressing Both Core and Category Topics in Training*
- *Pesticide Applicator Recertification: Guidance on Including Both Core and Category Topics*

These documents are intertwined and serve as the beginning to addressing some critical parts of producing a good recertification program. As CTAG develops more guidance documents, they will be added to this series.

Purpose

In the previous paper in this series (“Addressing Both Core and Category Topics in Training”), CTAG endorsed the idea that a balance of both core and category-specific training is necessary for a comprehensive state recertification program. However, CTAG does not have a strict image of how such a balanced training program would look. CTAG encourages states to be flexible and creative as they seek to improve the quality of their recertification training by incorporating both core and category components. This paper provides examples of how some states are currently doing this; the examples may be useful to other states that want to adopt this practice if they look to change their recertification requirements in the future.

Background

FIFRA requires states to ensure continued competency of certified applicators after initial certification has been obtained. As was discussed in the CTAG paper on Content Criteria, 40 CFR 171.8(a)(2) (Pesticide Applicator Certification) does not provide any direction on how that is to be done nor what knowledge a certified applicator must gain or exhibit in order to demonstrate continued competency.

The concept of including both core and category-specific topics in recertification training raises several questions, such as how would a state determine whether a training addresses core and/or category-specific material and what might a balanced program look like? These and other questions will be addressed in this paper.

Distinguishing Between Core and Category-Specific Content

How does a state determine whether the content covered in training is core or category-specific or, if the latter, to which category or categories it pertains? Rather than try to draw a fine line between core and category or between categories, the goal should be to make a reasonable determination that can be supported by comparing the proposed content of training with the state’s regulatory definitions for the various categories. Such an approach would likely lead to a tendency toward inclusion rather than exclusion; that is, toward the realization that many—if not most—training topics can benefit applicators from more than one category.

For example, if a training session will cover brush control in right-of-ways, it would be reasonable to determine that the training may also be suitable for the Forest Category because the problem vegetation, herbicides, and management strategies greatly

overlap between the two categories. Such a decision could be supported by the scope of each category as outlined in the regulatory definitions. On the other hand, if the training session were to address the proper use of specialized equipment designed to achieve total vegetation control along roadside guardrails, it would seem reasonable to determine that the training is specific to the Right-of-Way category.

In a similar manner, if a training session seems to cover a topic area that would be pertinent to most or all categories as they are defined in the state's regulations, the reasonable determination would be to say it is core training.

Another issue arises in assigning the actual number of credits. Suppose a state considers an hour of recertification training to equal 1 credit. (Some states use the term continuing education unit, or CEU, instead of "credit.") If the hour training mixes core and category-specific material, where does the state assign credits? Or if the guardrail training covers herbicide mode of action in addition to the use of specialized equipment, can a portion of 1 credit be awarded to Forestry as well? As with selecting core vs. category(ies) with respect to topics, the determination in each case comes down to a judgment call by the C&T personnel. One thing to keep in mind is that credits are requested by the training sponsor and are typically assigned before the training takes place. Thus, applicators know whether attending the training would help satisfy their recertification requirements, and they can choose whether to attend accordingly. In that sense, then, it doesn't matter if someone could argue that the state could have assigned credits differently because no one is harmed by the decision. However, it is important to document the decision and its rationale to ensure such decisions are consistent and defensible and to be sure to assign credits before the training event is advertised.

State Examples

For states which do not currently require both core and category-specific recertification training, the biggest hurdles to adopting that practice include:

- Staff time to devote to classify training content as either core or category-specific and to track each applicator's accumulation of such training,
- Computerized database and IT support needed to track applicator progress,
- Lack of content experts to develop and deliver category-specific recertification training in minor categories (e.g., wood preservation, seed treatment),
- Lack of funding required to overcome the above hurdles, and
- State laws and/or regulations that prescribe recertification procedures which are inconsistent with requiring core and category-specific training.

In addition, any change to such an integral component of a state's certification & training program is certain to have varying degrees of financial and procedural impact on the program and on the regulated community; each state must consider and weigh these impacts before instituting any change.

Following are examples of how several states assign and track core and/or category-specific recertification content; these examples may provide insight for other states who are willing and able to proceed toward requiring both core and category-specific recertification training.

New York

New York State requires that at least 25% of the required number of recertification credits must be earned within the category in which a person is certified. The remaining 75% can be within the category or core or any combination of the two. Thus, while New York distinguishes between core and category credits, it does not require an applicator to get any core credits; the applicator merely has the option of obtaining some core credits as part of the required total. Because New York has a minimum requirement for the number of category credits, it obviously has to determine whether any given training qualifies for credits within one or more categories. Therefore, it really is no extra burden to determine whether all or some of a training event qualifies for core credits.

The process of assigning recertification credits begins when a person who wants to hold a recertification training event submits an application to the Department of Environmental Conservation (DEC; New York's State Lead Agency). The application must include an agenda with start and stop times for each topic, a description of each topic, and the types of credits (core and/or specific category(ies)) being requested. If the DEC approves the training event, it also determines how many core and/or category-specific credits to assign; however, in doing so, the DEC is not bound to honor or limit itself to the types of credits requested in the application.

As an example, suppose a person submitted an application and requested credits for core, Forestry, and Right-of-Way. If the DEC approves the course, it can choose to assign credits for:

- All three topic areas (core, Forestry, and Right-of-Way) as requested;
- Only some of the requested topic areas; or
- All or some of the requested topic areas PLUS other topic areas (e.g., Ornamental & Turf) to which the agenda seems to pertain.

The number of credits assigned to a particular topic area (core or category) will be based on the amount of time devoted to that topic area in the agenda that was

submitted with the application. Therefore, it is important that the agenda provides enough information about what will be covered for the state's certification staff to make such determinations.

Minnesota

Persons licensed by the Minnesota Department of Agriculture (MDA) to apply pesticides recertify at category-specific workshops. Attendance at a workshop helps a person maintain competency as a pesticide applicator and qualifies them to renew their license. MDA only approves workshops that incorporate both core and category training topics. The University of Minnesota Extension (UME) and other workshop sponsoring organizations use tasks identified as essential for initial category certification as a guideline for developing recertification training topics. MDA encourages other sponsors to work with UME to create a broad-based balance of core and category training topics at training sessions. MDA requires training to cover the spectrum of the category activities over time, but does not require a specific percent of category content.

Sponsoring organizations must submit workshop proposals to MDA for approval several months in advance of the training that meet both length and content requirements. A workshop registration process must be widely publicized and attendance opened to all applicators. MDA staff participate in approved workshops to: 1) present substantial training content; 2) identify attendees and verify their attendance; and 3) evaluate workshop content and the overall performance of the sponsoring organization.

With limited resources to accomplish the goals of certification, recertification, and licensing, MDA approves only a limited number of recertification workshops each year. MDA does not approve individual course hours (CEU), online training, or in-house training for the purpose of recertification. MDA tracks workshop attendance and ensures through its workshop approval process that licensed applicators receive a broad-based recertification experience that includes both core and category topics. Persons unable to attend a recertification workshop can recertify by retesting in both the core and category. However, an applicator who attends a workshop that is not within their category of certification will still receive recertification credit for the core portion of the agenda; such an applicator would then need to retest only in their category to maintain their certification.

Oregon

The Oregon Department of Agriculture (ODA) pesticide licenses are based on a 5-year certification period. The recertification credit hours necessary to recertify for a subsequent 5-year period differ between the type of pesticide license. A pesticide licensee has two options to attain recertification:

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1. Attend ODA-accredited courses for recertification purposes, or;
2. Take, and pass, all certification exams

If the first option is chosen, then the number of credit hours needed are as follows:

- Private pesticide applicators:
 - 16 total credit hours are needed during the 5-year certification period.
 - 4 of the 16 hours must be designated as CORE hours.
 - 12 of the 16 hours may be designated as non-CORE (OTHER) hours.
 - No more than 8 hours (including CORE) may be taken in any one calendar year.
- Consultants, public and commercial applicators:
 - 40 total credit hours are needed during the 5-year certification period.
 - No more than 15 credit hours may be taken in any one calendar year.
 - Credits may be either CORE or non-CORE (OTHER).

In Oregon, there is no “category-specific” accreditation for pesticide applicators. CORE credit hours are only required for private pesticide applicators.

Although category-specific recertification has been discussed and the benefits are perfectly clear, the administrative process of calculating credit hours for one specific course and the applicability of each topic to one or more of 19 distinct categories is resource intensive. Additionally, an average of ????? course approvals are made each year. Not only would this intensive evaluation of agenda topics require more staff time to assign the appropriate number of hours to the appropriate category(ies), it would also require a complete reprogramming of the recertification database that tracks credit hours for each licensed applicator/consultant. It is for this reason that ODA tracks CORE and OTHER credits only as is necessary for private applicators.

Indiana

In Indiana, certified pesticide applicators recertify by obtaining a specified number of category-specific continuing credit hours (CCHs) over a 5-year period. Though the Office of Indiana State Chemist (OISC) does not require core CCHs, an informal analysis of approved training programs showed that core material is regularly covered.

Training sponsors submit program details to the OISC for review and assignment of appropriate CCHs and categories. The OISC sends sign-in sheets to training sponsors and requires the sponsors to verify attendance and return the the sign-in sheets after the program. The OISC then enters the information into a database; applicators can search how many CCHs they have accumulated on the OISC web site.

Alabama

Commercial pesticide applicator recertification in Alabama is based on a point system (30 points in a 3-year cycle). Applicators can get points by attending ADAI-approved recertification workshops that each provide at least 4 hours of training specific to a category in which the applicator is certified; there is no requirement to address core-related topics during recertification training. An applicator may hold certification in one category or multiple categories, but all that is required is a total of 30 points.

Recertification meeting/training requests are submitted to ADAI at least 30 days prior to the meeting/training date. The request is reviewed and if approved for one or more categories, an approval letter and roster are mailed to the meeting host. ADAI will monitor attendance at recertification meetings/trainings, as staffing permits, and participate in the workshops by providing state/federal information and scanning commercial pesticide applicators in/out. If ADAI does not monitor recertification meetings/trainings, the recertification meeting host will instruct meeting attendees to sign the meeting roster. The meeting host submits/returns the roster to ADAI within 15 days following the meeting and ADAI awards points to the attendees that qualify to receive credit for the meeting/training. ADAI maintains a database to track the points obtained by each certified commercial applicator.

Iowa

In Iowa, pesticide applicators can recertify by attending an approved recertification Continuing Instructional Course.

For private applicators, ISU Extension and Outreach (ISUEO) develops CIC training based on a 3-year cycle where applicators attend a 2-hour training for each of the 3 years in the cycle. If CICs are missed in one or more years of their 3-year cycle, the applicator is required to take the certification exam(s) to renew his or her certification. All private applicator recertification is approved by the Iowa Department of Agriculture and Land Stewardship (IDALS) and provided by ISUEO, and must cover specific required topics such as laws and regulations, storage and safe handling, calibration of application equipment, effects of pesticides on groundwater, personal protective equipment, pesticide labels, and pests and pest management. Thus, and IDALS-approved CIC addresses core material as well as topics that are specific to private applicators. Private applicators receive a certificate of attendance at the end of each training session and keep it in their records; in their renewal year, they submit copies of their certificates of attendance to IDALS. ISUEO retains sign-in sheets from each training for a period of 4 years.

Commercial applicator recertification is also based on a 3-year cycle; for each of the 3 years in the cycle, applicators attend a 2-hour (CIC) that covers each of the categories for which the applicator wishes to maintain certification. (Attending a CIC that covers any other category would not count toward recertification.) Commercial recertification training is offered both by ISUEO or other training providers approved by IDALS. Commercial applicators receive a certificate of attendance at each training from ISUEO or the training provider. The applicator then files the attendance form with their employer. Sign-in sheets from each training are retained by ISUEO or the training provider for 4 years as requested by IDALS. In their renewal year, commercial applicators sign a renewal application which indicates whether they will recertify by CICs or by exam; if by CICs, an applicator's employer must provide the necessary certificates of attendance to IDALS upon request if IDALS wishes to verify the applicator's attendance. If CICs are missed in one or more years of their 3-year cycle, the applicator is required to take the core and category certification exams to renew his or her certification. However, if an applicator is certified in two categories and attends the necessary CICs for only one of them, the applicator would have to take only the second category exam; because attendance at the CICs would preclude the need for taking the core exam in the first category, there is no reason to require taking the core exam for the second category.

A commercial CIC delivers core and category-specific content for pesticide applicators. For example, over the course of the 3-year cycle from 2012-2014, structural pest control applicators will receive training in core areas such as labels, laws and regulations, pesticide storage, and personal protective equipment as well as in category-specific areas such as pests, pest management, safe application techniques, and factors which may lead to exposure in sensitive individuals (e.g., children, pregnant women, and the elderly).