



# CTAG

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

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## **Pesticide Applicator Recertification: Auditing Recertification Programs**

**August 2011**

*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: Auditing Recertification Programs*

*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**

This document offers guidance for SLA's for auditing training events that have been approved for pesticide license recertification. Entities that do not have continuing education or pesticide training requirements for recertification generally retest all applicators or provide SLA sponsored and audited workshops

to maintain continued competency. However, even states that do not use recertification training as a means for license recertification may find the evaluation checklists and guidance helpful to evaluate their own pesticide applicator safety training programs.

## **Introduction**

One way to help ensure the quality of continuing education training and reduce pesticide misuse is through conducting program evaluations, or audits. For the purposes of this paper, *audits* are recorded evaluations or inspections of training programs.

## **Audit Triggers**

Generally, seminar audits are performed on a routine basis depending upon each state's statutes, policies, or cooperative agreement with their respective EPA region. Specific feedback from seminar attendees or other observers may augment the regular SLA audits and indicate a need for additional audits of specific seminars or seminar providers. Participant observations and feedback help determine if the programs, sessions, or modules exceed the requirements for valid training or are deficient. Many pesticide training programs, especially Cooperative Extension-sponsored events, provide participants the opportunity to evaluate the training program. These types of evaluations may indicate issues with the quality or content of a specific training program and would be a significant reason for the SLA to perform a formal audit of the program. For example, negative comments on a specific seminar provider or speaker may indicate a potential issue with training quality. However, these observations should only be used as an indicator of the training performed and should not be used as a definitive representation of the training program. Corrective action or punitive measures should not be taken against any seminar provider based upon unsolicited comments or observations.

## **General**

Pesticide training must be properly planned, scheduled and executed for it to be effective and worthwhile for the participants. Many states have statutory requirements or established policy for approving pesticide training for recertification. States that allow recertification by training set a minimum standard for approving Continuing Education Units (CEUs) or Credits. Generally, issues surrounding pesticide training are with the conduct of the actual training seminar or session and not with the approval process. Auditing is necessary to ensure seminar providers are providing pesticide training that is an accurate reflection of the training they submitted during the approval process and to the standard required by the SLA.

Properly executed pesticide training is valuable in decreasing the number of pesticide applicator related incidents. Therefore, auditing as many training events as practically possible and addressing any significant issues should be a goal of the audit program. It is advisable that states that use training as a means for pesticide applicator license renewal perform a significant number of seminar

audits per year. This will stress the importance of quality pesticide training to the training provider.

All types of training sessions should be audited to an established set of standards to ensure their quality. In the case of live (face-to-face) training, an evaluator (auditor) should be physically present at the training to perform the audit and should be trained or authorized by the responsible agency to perform these audits. With live audits, it is helpful to have a standard checklist to record pertinent observations. With online training, the auditor should review the entire online session as they would be if they were the applicator receiving training for credits or training hours. The auditor should also be knowledgeable about online training and test the training module for any process that will either allow the user to receive the credit for the training without performing or completing the entire program.

A feedback system should be established to provide information to the training providers as to the value of their training and possible ways to improve their training programs.

Additionally, audits should be used as a tool to help correct any training events or seminars that do not comply with the standards established by the SLA. These corrective or punitive actions (if necessary) are essential to maintain standards for pesticide applicator training.

Checklists for pesticide training quality management focus on actual training events, seminars or classes. Any checklist used for seminar verification will generally be subject to the administrative policies and statutes of the state involved. Because statutory, rule, or policy requirements for pesticide training vary by state, it is incumbent upon the regulatory agency responsible for validating pesticide applicator training (normally the SLA) to develop a checklist that is specific for their state, tribe, region or area. Generic evaluation checklists are provided (Appendices I and II) to assist the SLA in developing their own specific checklists.

## **Audits – Live Training**

The provider of live training must permit an SLA representative to monitor or audit a training session at any time and at no cost to the auditor. The SLA representative must not be prohibited from conducting an audit unless there are significant circumstances such as security issues that have not been properly coordinated with the training provider prior to the audit.

At a minimum, the auditor must determine if the seminar meets the following three basic goals:

1. The training session or seminar follows the agenda submitted to the SLA for credit approval.
2. The training session is of sufficient duration as approved by the SLA.
3. The training provides the attendees quality education that will enhance their knowledge of pesticides and pest management related subjects.

These goals may be further subdivided into specific elements of evaluation, depending upon the needs of the evaluating agency (policy or statutory requirements).

Audits are important for all types of training including live “in-house”. In-house training (generally provided by private industry exclusively for their employees) is greatly influenced by the operational aspects of a business. The quality of this type of training is sometimes sacrificed for operational or business needs. For this reason, some states do not accredit in-house training as acceptable for recertification or if they do accredit this training, they place a higher emphasis on these audits. States that accredit in-house training should place emphasis on auditing these trainings.

It should be noted that the audit of any pesticide applicator training should include details on good and/or poor aspects of the training. In this way, proper feedback can be provided to the training provider.

## **Audits – Online Training**

Many states approve online based training for applicator recertification. This type of training is extremely beneficial to applicators that live a considerable distance from live training sites. The sessions offered by online training companies and universities are varied as to their content and time requirement for each session. Auditing actual online training (with participants) is difficult at best, as these courses are normally performed at the applicators’ home or work location. It is unlikely that an auditor will be able to observe an applicator perform online training; however it is possible for an auditor to perform this training as a part of the audit process. The attached checklist (appendix 2) is designed for this purpose.

Audits of online training are separate from the approval process of the online training and can provide valuable information to the SLA or approving agency as to the quality of the training once it is approved. This is particularly important if the online training provider changes any aspect of the training course without notifying the SLA.

## **Feedback and Actions**

Audit checklists must be returned to the SLA to provide feedback on how the training was conducted and if it met the established standard. The SLA should review these audits and provide feedback to the seminar or training provider on what the auditor observed during the training. It is important that both good and bad aspects of the training be included in the feedback. The training provider will then have more information to modify or improve the training programs. The feedback to the training provider, whether it is the Cooperative Extension or a private provider, cannot be understated. Often, very simple changes in presentation training, content or style may make the training excellent as opposed to simply meeting the standard. In situations where the SLA does not have the capability or manpower to fully review and respond to all audits, the

SLA should, at a minimum, address those seminars or training sessions that do not meet the standard for valid training.

When an audit conducted by an SLA representative identifies training that does not meet the standards for valid training, it is incumbent on the SLA to establish a system of corrective or punitive actions to address the situation. These actions and how they are administered largely depends upon how the SLA's system is established and what is allowed by their statutes, laws, rules, or policies. The actions could include:

- Revoking the credits or hours assigned to a training event or seminar.
- Reducing the credits or hours assigned to a training event or seminar.
- Suspending a seminar or training provider's ability to obtain validation.
- Suspending a specific speaker, session, or program from obtaining validation.
- Imposing additional requirements for future seminar or training event validation.
- Imposing mandatory evaluation at future seminars or training events.

As with all corrective or punitive actions, the intent is to ensure future compliance with established standards and to deter the occurrence of non-compliance. The SLA must be able to enforce punitive or corrective actions in order for training events or seminars to meet their standards.

## Summary

The importance of pesticide applicator training and its role in protecting public health and the environment by promoting compliance with pesticide statutes, law, rule and policy cannot be overstated. Evaluation of pesticide recertification training, whether it is live or online based, helps ensure the overall competency of pesticide applicators in states, tribes, or regions that allow for recertification of pesticide applicator licenses through training. Without training evaluation, the overall quality of pesticide related training is diminished and the integrity of the training program is damaged.

All states that have active training requirements for pesticide applicator license renewal should establish a minimum number of evaluations they will accomplish during any period (i.e. calendar or fiscal year).

Audits should focus on the actual event and any checklist (like those included in the Appendix) should be an accurate representation of the conduct of the training event. The audits should indicate if the training was conducted to the standards established by the SLA, and provide feedback to SLA and the training provider. Because of differences in the requirements for training, each state, tribe, or region should develop specific checklists that reflect their requirements for recertification training. Corrective or punitive actions are necessary to ensure compliance and future compliance with the training standards

Training is an essential element in helping reduce pesticide applicator violations. With an effective auditing program, the quality of pesticide applicator training is increased. A properly executed pesticide safety training event increases the

knowledge of the pesticide applicators that will, by extension, increase their competence and protect the environment.

## Appendix I

### Audit Checklist – Live Training

#### I. General Information (Note: Do not fill out if Seminar request is attached)

Seminar Name: \_\_\_\_\_

Company\Sponsor: \_\_\_\_\_

Seminar Active Dates: Starting \_\_\_\_\_ Ending \_\_\_\_\_  
mm/dd/yyyy mm/dd/yyyy

Seminar Location: \_\_\_\_\_

Seminar Point of Contact: \_\_\_\_\_ Telephone #: \_\_\_\_\_

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#### II. Evaluation Checklist

##### 1. Overall Seminar Evaluation:

\_\_\_\_\_ **Meets Seminar Standards** \_\_\_\_\_ **Does Not Meet Standards**

Seminar Auditor: \_\_\_\_\_ Date Evaluated: \_\_\_\_\_

##### 2. Criteria Checklist

Yes	No	
		Did the seminar follow the agenda submitted for recertification credits?
		Did all sessions provide adequate information to the attendees?
		If there were any substitutions for speakers or sessions, did these substitutions provide pesticide training that was equal to the original speaker or session? (Leave blank if no substitutions)
		Were speakers well prepared and did they present adequate pesticide training (as opposed to sales or marketing info)?
		Were the facilities adequate for the seminar?
		Were adequate breaks provided for the participants?
		Did the seminar provider adequately manage (limit) the movement of the participants in and out of the seminar area during the seminars?

*Note: An answer of "no" to any of the above bullets will require explanation, use additional sheets if necessary.*

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**Actions (Training Management Staff)**

\_\_\_\_\_ Requires Action for Non-Compliance

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\_\_\_\_\_ Copy to Seminar Provider

\_\_\_\_\_ Other Action

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# Audit Checklist – Online Training

## I. General Information:

Session Name: \_\_\_\_\_

Company\Sponsor: \_\_\_\_\_

Session Active Dates: Starting \_\_\_\_\_ Ending \_\_\_\_\_  
mm/dd/yyyy mm/dd/yyyy

Session URL: \_\_\_\_\_

Seminar Point of Contact: \_\_\_\_\_ Telephone #: \_\_\_\_\_

## II. Evaluation Checklist

### 1. Overall Session Evaluation:

\_\_\_\_\_ **Meets Training Standards**      \_\_\_\_\_ **Does Not Meet Standards**

Session Auditor: \_\_\_\_\_ Date Evaluated: \_\_\_\_\_

### 2. Criteria Checklist

Yes	No	
		Does the session reflect what is represented on the approval document?
		Were the text, pictures, diagrams, videos, etc., easy to view or read?
		Is the session duration adequate for the awarded credits?
		Does the session require the participants to pass an exit examination or during session quizzes to award credits?
		Were there any problems in running the online seminar?

*Note: An answer of "no" to any of the above bullets will require explanation, use additional sheets if necessary.*

### Notes:

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**Actions (Training Management Staff)**

\_\_\_\_\_ Requires Action for Non-Compliance

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\_\_\_\_\_ Copy to Online Seminar Provider

\_\_\_\_\_ Other Action

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