



# CTAG

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

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## Issue Paper

### Requiring Written Examinations for Approval of State Certification Programs

The pesticide applicator certification program is undergoing an assessment through the cooperative effort of the Cooperative Extension Service, State Lead Agencies, and the EPA to determine what changes should be considered to improve professionalism of certified applicators (Certification and Training Assessment Group, CTAG). One recommendation is to require proctored, written, closed-book examinations for both private and commercial applicators of restricted use pesticides. **Proctored, written, closed-book exams would become a requirement for approval of state certification plans.**

#### Background:

Most states currently require exams to ensure competency. A survey was conducted for this assessment by the CTAG with all but one state responding. The results show that 78% of states require exams for private certification and 90% of states require exams for commercial certification. Those requiring closed-book exams were: 64% for private and 90% for commercial certification; respectively, 76% and 82% required written exams.

It is a common misconception that Section 11 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) prohibited testing of private applicators. Under section (a) CERTIFICATION PROCEEDURE (1) **FEDERAL CERTIFICATION** – In any State for which a State plan for applicator certification has not been approved..., the Administrator,... shall conduct a program for the certification of applicators of pesticides. Such program shall conform to the requirements...under the provisions of subsection (a)(2) of this section and **shall not require private applicators to take any examination to establish competency in the use of pesticides.** (emphasis added)

Because this requirement falls under the federal certification portion of FIFRA, states can require examinations of private applicators when not prohibited by state law. Requiring a proctored, written, closed-book exam will facilitate consistency across the country and more effectively help to ensure competency of applicators. A proctored exam will help to minimize cheating, improve exam security and preserve the integrity of the exam; a written exam will help to standardize and document competency testing; and a closed book exam will help to ensure that those who pass the exam are able to demonstrate a good grasp of the competency standards.

Several issues need resolution should mandatory testing become a requirement for state certification plan approval.

1. Will making a proctored, written, closed-book exam part of the requirements for an approved state certification plan; require changes in federal regulations? If not, how will this be done?

2. Should a state be unwilling or unable to implement such a requirement, is the EPA willing to step in? What other options are available?
3. What problems are created for those states (16%) that currently do not require proctored, written closed-book exams for private applicators? What should be the time frame for implementation of this requirement? What tools are available to help those states develop a quality exam and the associated study materials?

*This issue paper was discussed at the 2003 North American Pesticide Applicator Certification and Safety Education Workshop in Hawaii. It was the consensus of Workshop participants that the phrase closed-book should be defined. As used in this paper "closed-book" means not allowing an exam candidate to bring in any reference materials as an aid to the exam. Allowing candidates to bring into the exam session their own reference materials potentially destroys exam security since a candidate could both bring in "cheat sheets" and other prohibited materials and take away from the exam session details of exam questions. Any state that wishes to test the knowledge, skill, or ability with the aid of reference materials can simply supply the required reference materials to candidates during the exam and still maintain the integrity and security of the exam. Such reference materials may include pesticide labels, pest damage or other specimens, or other materials necessary to test a desired knowledge, skill or ability. Candidates should not be allowed to remove such reference materials from the exam room. Reference materials should not include information that should be committed to memory, such as the core knowledge requirements.*

**Recommendation:**

The EPA should implement proctored, written, closed-book exams as a requirement for approval of a state plan for the certification of private and commercial pesticide applicators. This should be implemented over a three to four-year period to allow those states that currently do not require proctored, written closed-book exams to implement the requirement. The national core exam and associated training materials (EPA/PMRA Pesticide Applicator Core Examination and National Core Manual) will be available for use by all states, including those states that do not currently require proctored, written, closed-book exams.