



CTAG

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

Pesticide Applicator Recertification: Addressing Core and Category Topics in Training

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: Evaluation of Recertification Programs*
- *Pesticide Applicator Recertification: Addressing Core and Category Topics in Training*

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

The purpose of this paper is to address one aspect of recertification training content: the extent to which such training comprises Core and Category-specific topics. The paper discusses what constitutes Core and Category-specific training, suggests benefits of

providing recertification training in both areas, and provides examples of how some states are currently approving recertification training in both areas. 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.

However, because FIFRA does require a demonstration of continued competency, it is assumed that such competency will be in those topic areas relevant to an applicator's certification. This would seem to limit the potential range of topic areas to Core and Category-specific subject matter. However, the concept of exploiting this full range of topic areas raises a multipart question about including—and perhaps even requiring—both Core and Category-specific topics in recertification training:

- Is it possible to identify what is a Core topic and what is a Category-specific topic?
- Are Core topics relevant in recertification training?
- If Core topics *are* relevant, is there an appropriate balance between Core and Category-specific recertification training?
- Do states currently mandate or support mandating such a balance?
- How does (or would) a state track whether an applicator has received the Core and Category-specific training required for recertification?

Core and Category-Specific Topics

One issue that immediately arises when a state considers mandating Core and/or Category-specific training is that the distinctions between the two are often unclear. For example, it can be argued that an applicator who is certified in structural pest control would NOT be demonstrating continued competency by attending recertification training on topics that are unique to the control of nuisance aquatic plants. Yet in some instances, an applicator certified in right-of-way pest control could benefit from attending a training geared toward forest vegetation management. Therefore, “Category-specific” does not necessarily mean the training is applicable to only one category.

Likewise, exactly what constitutes Core training as opposed to Category-specific training is not necessarily cut and dried. In the Content Criteria paper, CTAG endorsed approving topic areas from 40 CFR 171.4 and 171.5 as acceptable topics for recertification. Many of these topic areas ostensibly address Core subject matter, such as the pesticide label, toxicity, transport, etc. However, even these subjects could be

topics of Category-specific training. For example, a session explaining the nuances of drift language on an agricultural pesticide label could easily be viewed as training specific to the category Agricultural-Plant. Likewise, transporting pesticides in large cities can involve carrying them on public transportation (e.g., subways, buses, light rail), which is entirely different from using farm equipment or service vehicles to transport pesticides; therefore, training with respect to carrying pesticides on public transportation would fit best as Category-specific training for structural pest control operators.

Given this sort of overlap, is there anything that is truly Core with respect to recertification training? The answer is “yes.” State laws and regulations that affect all applicators, emergency response procedures, and risks to humans and the environment are examples. The question some might ask is whether these topics are appropriate for recertification training because they seem to have been already covered during initial certification training.

Benefits of Core Topics in Recertification Training

It is intuitive that Category-specific training is desirable in attaining recertification. Changes in pesticide chemistry, application equipment and techniques, new pest outbreaks, and approaches to IPM specific to a particular category of pesticide applications are just some examples of areas in which progress and change are almost constant. To demonstrate continued competency, it is reasonable that an applicator stay current in such areas that directly relate to the applications being made.

Likewise, arguments can be made for providing Core training in recertification programs. As with Category-specific topics, Core topics are also subject to change. For example, state or federal laws and regulations affecting all applicators may be updated and expanded at any time. Advances in personal protective equipment, chronic exposure studies such as the Ag Health Study, and changes in emergency response procedures (e.g., the change to a single, nationwide phone number for Poison Centers) are important to all pesticide applicators. Keeping current in these areas is just as important as keeping current with Category-specific topics.

In many cases, an argument can also be made for the importance of reviewing information previously learned to ensure continued competency. Learning spill response once does not mean it is forever retained to the extent that would allow for rapid response in an emergency. Recognition of symptoms of pesticide poisoning or heat stress is something that people outside of the medical community are unlikely to recall easily without regular reminders. It is also good for state pesticide enforcement programs to let applicators know what the common violations are; this is a proactive

approach to protecting people and the environment that essentially involves a review of Core material that the regulated community has had difficulty grasping.

Incidents can also warrant a review and expanded coverage of Core topics. With the heightened concerns of terrorist attacks after 9/11, it would have been almost unconscionable NOT to remind certified applicators and pesticide dealers of the importance of chemical security and steps they can take to ensure it.

Given this discussion, CTAG endorses the idea that a balance of both Core and Category-specific training is necessary for a comprehensive state recertification program.

Balancing Core and/or Category-Specific Training for Recertification

There is evidence of state pesticide certification and training (C&T) programs supporting such a balance. In a 2007 CTAG survey of state C&T programs, 21 of 27 responding states were in favor of requiring a minimum amount of Core credits for recertification. Similarly, 21 of 25 responding states favored a Category-specific minimum.

But 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 to 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 pests, 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 as well as use of specialized equipment, can part of a credit be awarded to Forestry? 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.

State Examples

Below are three examples of how states seek a balance between 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 will determine 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., Turf & Ornamental) 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. It is therefore important that the agenda provides enough information about what will be covered for the state 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. Sponsors are informed of non qualifying topics. MDA encourages sponsors to work with UME in the development of their workshop content 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.

MDA issues licenses to about 10,000 commercial applicators and certifications to about 17,000 private applicators annually. The recertification requirement for these persons varies. Persons with commercial licenses who are required to recertify annually must attend a workshop of at least 4 (actual) hours in length; every two years at least 5 (actual) hours; and every three years at least 6 (actual) hours. 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 assures through its workshop approval process that licensed persons receive a broad based recertification experience that includes both Core and Category topics. Persons

unable to attend a recertification workshop can get recertification credit by retesting in both the Core and category.

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:

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 five-year certification period.
 - 4 hours (of the 16) must be designated as CORE hours.
 - 12 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 five-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 at this time. There is consideration of adopting a CORE requirement for all pesticide applicators and consultants since there appears to be a demand for this type of information to keep applicators up-to-date on changing laws and requirements. This change would require a change to the Oregon Administrative Rules.

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. 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, in Oregon, a complete reprogramming of our recertification data base that tracks the training sessions and credit hours that each applicator/consultant licensed in the state attends over the course of their five-year certification period. It is for this reason, ODA tracks CORE and OTHER credits only as is necessary for Private Applicators.