



CTAG

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

Progress Report of the Certification & Training Assessment Group May 2005

Introduction to the Certification & Training Program

Protecting the public and the environment through the safe and effective use of pesticides is the underlying purpose of the pesticide applicator certification and training (C&T) program. With the 1972 amendments to the Federal Insecticide, Fungicide, Rodenticide Act (FIFRA), the U.S. Environmental Protection Agency (EPA) was given the authority to restrict the use of pesticides to only certified applicators (or persons under their supervision.) The determination of competency was delegated to pesticide state lead agencies (SLAs). Pesticide applicator training was delegated primarily to state cooperative extension services (CES).

There are approximately 1.2 million pesticide applicators in the U.S. who have received certification to use Restricted Use Pesticides (RUPs) on farms by air and ground equipment, in greenhouses, nurseries, golf courses, industrial plants, food production facilities, hospitals, homes, restaurants, businesses - just to name a few. Additionally, many states require certification to use general use or unclassified pesticides in specialized areas. Since the early 1970s, the national C&T program has evolved to address such issues as the need for chemical-specific training, the protection of sensitive populations, increased public concern over pesticide use, agricultural/urban interface, pesticide use in schools and a growing segment of the pesticide applicator workforce which is not fluent in English.

The Certification & Training Assessment Group

Background

The Certification & Training Assessment Group (CTAG) was created to assess the current status and future needs of state certification and training (C&T) programs, as well as to provide direction for the future of the national pesticide applicator C&T program. At the state, territorial and tribal level, the C&T program is primarily handled by state, territorial or tribal governments and land grant universities. CTAG's mission is to develop and encourage the adoption of proposals that strengthen federal, state, territorial, and tribal pesticide C&T programs and help to ensure safe and effective pest management through enhanced knowledge, skills and attitudes of pesticide users.

CTAG's Purpose

The CTAG Charter establishes CTAG's purpose: to facilitate improvement in the national pesticide applicator certification and training program.

CTAG is currently conducting a comprehensive assessment of the pesticide applicator

certification program. The assessment is a collaborative effort of the EPA, CES, SLAs, USDA and TPPC to determine what changes should be considered to improve professionalism of certified applicators and to improve State and Federal plans to provide a comprehensive pesticide safety program that demonstrates competency, mitigates risk, and improves pesticide security through education, training, and testing of all persons who sell, mix, load, apply, or recommend the use of pesticides.

CTAG Board of Directors

CTAG is managed by a Board of Directors which draws its membership from representatives of EPA, USDA, SLA, CES and TPPC. Board members generally serve overlapping three year terms. Offices on the CTAG Board include two Co-Chairs, a Vice-Chair and a Past Co-Chair. CTAG workgroups are established by the Board, as needed, to work on specific tasks. A CTAG charter was developed to formalize the roles and responsibilities of the CTAG Board. The Board determines the current status and future direction of the program, creates and coordinates workgroups, provides updates on accomplishments, and maintains a communications network with partners.

For more information, refer to the CTAG web site (<http://pep.wsu.edu/ctag>).

CTAG Activities in 2004/2005

CTAG Board of Directors

The CTAG Board of Directors saw several changes in 2004/2005. Four original members left the CTAG Board due to term expiration or changes in employment, Carl Martin with the Arizona Structural Pest Control Commission, Jeanne Heying Kasai with EPA, Patrick O'Connor-Marer with the University of California at Davis, and Winand Hock AAPSE President. In addition, William Tozer with the Armed Forces Pest Management Board, Elaine Wilson with TPPC and Mary Ellen Setting with the Maryland Department of Agriculture also left the CTAG Board in 2004 due to changes in employment. Five new members were elected to the CTAG Board, Andrew Thostenson with the North Dakota State University, Kathy Dictor with the Virginia Department of Agriculture and Consumer Services, Lori McKinnon with the Yurok Tribe, Dean Herzfeld with the University of Minnesota, and Kerry Richards with Penn State University. Early in 2005, Tim Drake with the South Carolina Department of Pesticide Regulation and Henry Ghiotto with the Quechan Tribe were also elected to the CTAG Board.

In 2004, Co-Chair Gina Davis with the Michigan Department of Agriculture moved to the Past Co-Chair position. Vice-Chair Carol Ramsay with Washington State University moved up to the Co-Chair position and Andrew Thostenson with the North Dakota State University was elected Vice-Chair.

Michelle Devaux replaced Al Muench as permanent CTAG secretary.

CTAG Presentations

CTAG Board of Directors Co-Chairs Kevin Keaney and Carol Ramsay, Past Co-Chair Gina Davis, and Vice-Chair Andrew Thostenson, made several presentations to AAPCO, SFIREG, ASPCRO and AAPSE to provide updates on CTAG activities and to discuss progress on CTAG projects. Additional presentations were made by CTAG Board of Directors members to the North Central Pesticide Meeting, Northeast Regional Pesticide Meeting, Southern Regional Pesticide Meeting, the Western Regional

Pesticide Meeting, and the 2004 International Conference on Pesticide Application and Drift Management.

CTAG Liaisons

The CTAG Board recognizes the importance of maintaining open communication with CTAG participants, partners and stakeholders. Consequently, an important Charter amendment was adopted to require the appointment of Board members as liaisons for AAPCO, AAPSE, ASPCRO and TPPC. Liaisons are responsible to coordinate with their constituencies and provide feedback concerning CTAG activities. Current liaison appointments are: Jack Peterson (AAPCO), Carol Ramsay (AAPSE), Tim Drake (ASPCRO) and Henry Ghiotto (TPPC).

CTAG Communications

Effective communication with our partners and stakeholders is critical for building support for improvements to the C&T Program.

The Board took several steps in 2004/05 to improve communications. For example, the Board committed to posting on the CTAG web site a schedule of all upcoming CTAG meetings, as well as a summary of all CTAG meetings. Regular announcements of CTAG activities and accomplishments are made through the AAPCO, ASPCRO, AAPSE, PSEP and TPPC listserves.

In addition, the Board used these listserves to gather input using a structured approach to initiating, developing and processing issues considered by the CTAG Board and its workgroups. The result is the CTAG Process for Issue Development, which describes the process for handling issues, and the CTAG Issue Tracking Document, which describes the status of issues considered by the Board. The "Process" and "Tracking" documents may be found in the Document Archive on the CTAG web site.

C&T Plan Template

CTAG developed the C&T Plan Template as a web-based system for submitting and assessing C&T Plans. This electronic template integrates the requirements of 40 CFR Part 171.7 (submission and approval of State Plans for certification of commercial and private applicators of restricted use pesticides) and Form 5700 33H (annual C&T reporting.) Use of the template will both simplify and standardize the updating and review processes for Federal Agencies, States, Territories, Tribes and EPA Regional Offices. In addition, information in the various C&T plans will also be much more accessible and useful to EPA staff and can be more easily shared among the state lead agencies. There is a public access button so anyone can peruse a C&T Plan and annual report.

EPA grant guidance made use of the template voluntary in FY 2004. In FY 2005, SLAs will be expected to use the template.

EPA Headquarters and Regions are working through any implementation problems that arise and are providing technical assistance to states experiencing difficulty in putting material into the template. They are also developing standard procedures for each Region to follow in reviewing C&T Plans submitted through the Template.

The template is currently hosted on the Washington State University web site:
<http://cru.cahe.wsu.edu/candt/logon.cfm>

CTAG Issue Papers and Guidance Documents

The development of issue papers and guidance documents is an important responsibility for CTAG, one which allows CTAG to serve as a forum in which issues can be developed and worked on so that a wide range of people become aware of both the issue and solutions. When an issue and solution emerge from CTAG, it is as a result of widespread support for the issue and the solution among the CTAG partners and stakeholders. CTAG continues to work on its public participation process to make it more inclusive and to further publicize its outreach efforts and to detail the processes through which particular issues have gone.

Completed: Minimum Age Issue Paper: CTAG believes a minimum age restriction of 18 years for commercial applicators and 16 years for private applicators (with the ability to address hardship situations) should be established for obtaining certification to purchase, apply or supervise the use of restricted use pesticides. Adopting this proposal will reduce the risk to youth from occupational acute pesticide exposure, improve regulatory enforcement involving minors, help to avoid liability from conflicts with federal and state child labor laws, and reduce public criticism of the pesticide program should a high profile incident occur. This, in turn, will lessen the risk of losing critical pesticide uses in the future. Establishing a minimum age requirement will not drastically reduce the youth labor pool in agriculture or other major pesticide use industries and it does not preclude youth from participating in pesticide education programs.

A draft version of the issue paper was previously discussed in several forums including the 2003 North American Pesticide Applicator Certification and Safety Education Workshop, the 2003 National Pesticide Stewardship Alliance Conference, regional pesticide meetings and at meetings of SFIREG and AAPCO.

In September 2004, CTAG formally solicited comments on the draft issue paper from subscribers to the AAPSE, ASPCRO, PSEP, SLACERT and TPPC listserves. In December, 2004 the CTAG Board of Directors discussed all comments received and voted unanimously to adopt the minimum age issue paper which is now posted on the CTAG web site.

In the issue paper, CTAG recommends that EPA, through its annual cooperative agreement review process with SLAs, strongly encourage its partners to:

- Review state and federal child labor laws for inconsistencies with their current certification program and begin discussions with stakeholders to address them;
- Establish legally defensible protocols and procedures for handling pesticide enforcement cases involving minors; and,
- Implement a minimum age restriction of 18 for commercial applicators and 16 for private applicators, with the ability to address hardship situations.

CTAG recommends to EPA that this be a requirement for approval of a state plan for the certification of private and commercial pesticide applicators. CTAG believes this requirement should be implemented over a three to four year period to allow those states that lack the required age minimums to build alliances and to implement the necessary authority or legislation.

Completed: Requiring Monitored, Written, Closed-book Exams: This issue paper seeks to improve professionalism of certified applicators by requiring all states to use monitored, written, closed-book examinations for certification of both private and commercial pesticide applicators. The CTAG Board approved this issue paper. As part of the process of gaining partner and stakeholder support, the CTAG Board authorized submission of the issue paper to AAPCO/SFIREG and presentation and discussion of the issue paper at the 2003 North American Pesticide Applicator Certification and Safety Education Workshop. The issue paper was originally discussed at the SFIREG/POM Committee in October, 2002. Following comments from SFIREG/POM, the issue paper was redrafted with a clear definition of “closed book” and clarifications in October 2003. The issue paper was further discussed by AAPCO/SFIREG which, in December 2003, agreed to support this issue paper. In 2004, with the paper in its final form, CTAG forwarded this recommendation to EPA.

Completed: Positive Identification for Restricted Use Pesticide (RUP) Purchases: This issue paper has been under development since 2002 and recommends that EPA develop guidelines and implement requirements for positive identification of all private and commercial applicators making face-to-face purchases of RUPs. This issue paper is designed to improve the level of security surrounding the purchase of RUPs by requiring positive identification in addition to the possession and presentation of a valid pesticide applicator certification credential. (This issue paper does not address telephone and Internet sales of RUPs.) As part of the process of gaining partner and stakeholder support, the CTAG Board authorized submission of the issue paper to AAPCO/SFIREG and presentation and discussion of the issue paper at the 2003 North American Pesticide Applicator Certification and Safety Education Workshop. The issue paper was discussed by AAPCO/SFIREG which, in December 2003, agreed to support this issue paper. In 2004, CTAG decided to continue working on this issue paper to develop even stronger support. The CTAG Board approved this issue paper in December 2004 and will forward its recommendation to EPA. In May 2005, the paper was reformatted using the new style template, but retained the same content. Both versions will remain on the CTAG website.

Nearly Complete: Exam Administration & Security Procedures Manual: In March 2004, the CTAG Board approved a new Exam Administration and Security Procedures Manual. The manual is intended to provide advice and guidance to state, tribal and territorial pesticide programs to help raise standards for exam administration and security. Use of this manual may be tied into use of the new national core exam so that EPA can have some assurance that states using the core exam have in place adequate exam security procedures to help protect EPA’s investment in the core exam.

The Exam Administration and Security Procedures Manual will be put into PDF format and distributed to partners and stakeholders; printing of the manual will take place during FY 2005.

Positive Identification for Certification and Recertification Exams: CTAG is currently drafting for partner and stakeholder review and comment an issue paper on Positive Identification for Pesticide Certification and Recertification Exams. The draft issue paper will propose a minimum national standard for requiring positive identification for a

candidate for a certification exam or for a certified pesticide applicator who is a candidate for a recertification exam. CTAG has been working on this issue since 2003.

Guidance Document on Recertification Training: In 2004, CTAG analyzed the results of a CTAG survey regarding procedures used by states and territories in administering training to large groups. As a result of this analysis, the CTAG Board is still assessing what strategy might be appropriate to assist states with their recertification programs. A BMP guidance document has been considered. The guidance document might address the need for positive identification of applicators receiving recertification training with advice and guidance on recertification training including course content, speaker qualifications, course monitoring and determining effectiveness of training. Work is continuing on this issue and partner and stakeholder input is encouraged..

Fumigation Management Plans (FMPs): New phosphine fumigation labels have been approved by EPA. Consequently, updated manuals and sample fumigation management plans will be needed by both private and commercial applicators. In addition, several registrants have expressed concerns about the lack of a new phosphine training manual and the liability issues associated with not having a new manual. Sample FMPs and resource documents are located on the NDSU website and PSP website under "What's New."

Exam Blueprints/Job Task Analyses

EPA has committed funds to perform job analyses for a variety of categories, beginning with the aerial and right-of-way categories. The job analyses will be used to develop exam blueprints for each exam. An exam blueprint is an important tool that an SLA can use to develop an exam which the SLA determines best meets its specific needs. The exam blueprints can be used by CES programs to develop companion training materials.

CTAG is considering working with EPA to develop a process to create a series of exam blueprints for each federal pesticide applicator certification category and to facilitate their use by all states, tribes and territories which develop pesticide applicator certification exams. This issue will be addressed again after the 2005 Madison Workshop.

Program Reviews

PSEP Program Review: In 2004 EPA and USDA conducted a review of the PSEP program. A series of review meetings were held in July and September 2004, with a final report due in 2005. The end results will help EPA to better formulate policy in this area and will also provide a wider knowledge base for CTAG to use to develop projects in support of pesticide safety education. A report was made at the PPDC May 2005 meeting and also the Western Region Pesticide Meeting. Reports are to be posted on the EPA website.

OMB PART Review: In 2004, the Office of Management and Budget began a Performance Assessment Rating Tool (PART) Review of several EPA programs including the C&T program. One result of the review will be development of output and outcome measures to gauge the impact of the C&T program on human health and the environment. EPA will need to develop a variety of indicators that shows positive movement toward the measures OMB selects. CTAG will be aggressive in trying to

become a part of this process of developing the indicators.

Meeting OMB's outcomes and measures is made more difficult since EPA manages only a relatively small part of the entire pesticide program. The states manage the largest portion. Consequently, the measures may have a significant impact on state pesticide programs, which CTAG will try to mitigate.

Status of EPA Funding for SLA and C&T

The Office of Pesticide Programs was able to shelter \$1,200,000 for PSEP and \$750,000 for worker protection in its FY 2005 budget. The FY 2005 budget for the Field and External Affairs Division (FEAD) reduced the division's grants and contracts budget by \$1.3 million, or 26%. The \$1.2 million in funds for PSEP now represents 32.5% of the division's total grants and contracts budget.

CTAG is investigating non-traditional sources of funding for SLAs and CES and will distribute a report on findings at the 2005 Madison Workshop.

2005 North American Pesticide Certification and Safety Education Workshop

CTAG Board members participated in the development of CTAG related topic areas and agenda items for the 2005 North American Pesticide Certification & Safety Education Workshop to be held in August 2005 in Madison, WI.

Global Harmonization

The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) will standardize hazard words and symbols and will apply to all chemicals including pesticides. GHS implementation will require updating educational materials, certification exams and training manuals. CTAG has GHS on its radar screen and will develop an action plan to outline the general steps to follow in the development of new materials as EPA creates a timeline for implementation of GHS.

Additional 2004/05 EPA and USDA Efforts Related to C&T

National Core Exam, Manual and Powerpoint® Presentations

The core manual and presentation projects are companions to the core exam project and will result in a national pesticide applicator study manual and training materials to prepare candidates for the national core exam.

The national core exam, using two exam forms, is now in the pilot phase in which the exam is being used as a credentialing tool by Ohio, the District of Columbia, the U.S. Army and the province of Alberta, Canada.

The pilot phase will use the new national core manual (expected to be completed in FY 2005) which is based on the same exam blueprint. During the pilot phase, data will be collected on the performance of each test item and on the exams as a whole. This will allow the two exam forms to be "fine tuned" prior to nationwide availability of the exam. The pilot phase may also help recognize subject areas that need more emphasis during educational programs as well as provide important information about differences between various test administration methods (e.g. paper and pencil, computer based testing, remote testing via the Internet.)

A series of PowerPoint presentations is being created as a training tool to support the national core manual. The presentations may be revised or supplemented to meet the individual needs of each state. Delivery is anticipated for summer 2005.

Western Region Structural Pest Research and Demonstration Facility

In response to a new requirement that wood-destroying pest inspectors be trained and certified, Washington State University is building a new structural pest research and demonstration facility for applicators, inspectors and trainers. The facility will be a “hands-on” demonstration facility which will incorporate train-the-trainer courses as well as training for inspectors and applicators, and will handle the training requirements for a large new audience. The facility is a product of close cooperation and start-up money from Washington State University, the Washington State Department of Agriculture, and the PCO industry

Northeast Pesticide Safety Education Center (PSEC)

Following the model of the Southern Region PSEC, a new Northeast PSEC has been created at Penn State University campus. The new PSEC was born of a combination of seed money from EPA’s Certification and Worker Protection Branch, strong support from EPA Region 3, and matching funds from the PA Department of Agriculture.

The first training session is scheduled for September 11-14, 2005, at the Penn State University Park. The session is designed to be very “hands-on” and the goal is to have sufficient funding to be able to send each participant home with a wide range of training materials which will allow the participant to conduct “hands-on” demonstrations when they arrive home.

USDA Efforts

The Spray Table Demonstration Project headed up by Dr. Bob Wolf at Kansas State University continued in 2004. Spray demonstration kits are being constructed for distribution to PSEP educators for use in training sessions to demonstrate sprayer technology, nozzle types, spray pattern quality, and drift tendencies. In 2004, the project was able to complete approximately half of the spray table demonstration kits requested by state/territory PSEPs. Efforts are continuing to solicit funds to complete the remaining spray table demonstration kits.

Personnel from CSREES/USDA participated in the assessment of the Pesticide Safety Education Program (PSEP) in Washington, D.C. CSREES also provided input on PSEP during the Office of Management and Budget Review of CSREES.

CSREES continued to maintain the Performance Planning and Reporting System (PPRS) and received reports from nearly every state and territory for FY 2004 activities. A final summary of data from these reports will be issued in 2005.