

C&T PREP Course

Each year EPA sponsors several Pesticide Regulatory Education Program (PREP) training courses for officials in state pesticide regulatory programs. The first PREP course in the 2002 series was a Pesticide Applicator Certification Program Workshop held at the University of California, Davis on April 28 - May 1, 2002. This PREP course was presented by the Certification and Training Assessment Group (CTAG) and its two current workgroups, the State Plan Workgroup and the Pesticide Safety Workgroup, and focused on significant certification and training (C&T) issues affecting state and federal pesticide programs.

This C&T PREP course was attended by 18 state pesticide C&T officials, two representatives from cooperative extension programs, representatives from four EPA Regional pesticide programs and one EPA Headquarters C&T official. Faculty and speakers included representatives from six state pesticide regulatory and cooperative extension programs and several EPA Headquarters and Regional Office executives and staff. (More information on the agenda and participants may be obtained from the PREP web site at <http://www.prep-gov.net/course.htm>).

The C&T PREP course was divided into two separate working sessions. One session was devoted to developing an electronic reporting format for completing the state C&T plans and annual reports required by 40 CFR 171.7. The second session concentrated on brainstorming priority issues which will facilitate providing EPA with a proposed plan for a comprehensive pesticide safety program, applicable to all persons who sell, mix, load, apply, or recommend the use of pesticides, that will demonstrate competency, mitigate risk, and improve pesticide security through appropriate education, training, and competency testing.

The final one and one-half days of the C&T PREP course was presented by the CTAG Pesticide Safety Workgroup. This workgroup is addressing some of the longer range CTAG goals. Several of the higher priority CTAG goals were selected for presentation and discussion at this PREP course. The participants broke into three study groups, each concentrating on a specific priority: developing a tiered classification system for pesticides which relates the hazard of pesticides to the training needs of applicators and users, and reflects security issues related to pesticides; integration of the current Worker Protection Standard (WPS) training requirements for those in the WPS program who use or recommend the use of pesticides with a new applicator training program which would put into one place all of the national pesticide C&T regulations and allow the remaining WPS program to be more tightly focused on the workers who do not handle pesticides; and, remote testing for pesticide applicator certification and language standards where English is not the pesticide user's primary language. The study groups examined their priorities in-depth for about three hours. Each study group had 45 minutes to report back to the entire group on their findings and recommendations for action on these issues and to allow some group discussion. The entire group participated in similar joint brainstorming sessions, each about an hour long, to discuss national consistency for certification and recertification standards, security management

for transport and storage of pesticides, and photo identification requirements for exams, recertification and restricted use pesticide purchase or use.

The input that the Pesticide Safety Workgroup received from the PREP course participants is described in detail below.

Tiered Classification

The Tiered Classification Study Group was facilitated by Carl Martin with Al Muench as the Note Taker. Student participants were Elizabeth Braxton, FL Dept. of Ag.; Tim Drake, Clemson (SC) University; Jeff Goode, AK State Plant Board; Derrick Lastinger, GA Dept. of Ag.; Harry Schexnayder, LA Dept. of Ag.; Mac Matsuo Takeda, CA Dept. of Pesticide Regulation; Buzz Vance, NE Dept. of Ag.; and, Laurie Amaro, U.S. EPA Region 9. Faculty participants were Carol Ramsay, WA State University, and Colleen Hudak, NC Dept. of Ag.

Issues Discussed by the Study Group

The study group examined a number of ways to classify pesticides:

- Toxicity or hazard
- Assessment of security risk
- Level of pesticide education and safety training required
- Certification/licensing requirements
- Application site sensitivity
- The type of user

A number of criteria can be used to rank pesticides for a classification system such as security risk, level of toxicity or hazard, the user and level of training or education, site characteristics, and engineering controls. These criteria can be combined into a matrix or scoring system to classify pesticides.

The study group proposed a six-tiered classification system:

- A. Security Risk (e.g., fumigants)
- B. Product-Specific (or Prescriptive) Control (e.g., Metam sodium, Temik, P-44)
- C. Occupational - Full (Fully certified)
- D. Occupational - Limited (Less than full certification)
- E. Domestic - Mixable (Domestic products that require some preparation before use)
- F. Domestic - Ready-to-use (No mixing or other preparation required by user)

Some possible assignments to some of the tiers are:

- C. Occupational - Full: Consultants, manufacturer's representatives
- D. Occupational - Limited: Mixers and loaders, custodians, grounds maintenance, pet groomers, dealers of A-D products.

The study group looked at differing education and exam requirements according to tier:

A. Security Risk	Education + Exam(s) + Permit(s)
B. Product-Specific Control	Education + Exam(s) + Permit(s)

C. Occupational - Full	Education + Exam
D. Occupational - Limited	Education + Exam

E. Domestic - Mixable	Education

F. Domestic - Ready-to-use	?

There could be different levels of Education Controls such as:

- Declaration - Acknowledgment that educational materials were received. (F. Domestic - Ready-to-use)
- Verification - Training materials were received and understood. (E. Domestic - Mixable)
- Exam - Demonstration of competency. (A-D)
- Permit - Product-specific grant of right-to-use. (A and B)

Additional controls could be applied by tier including chain-of-custody controls for the Security Risk Tier; mandatory training prior to exam for Tiers A-D, with perhaps only training, but no exam, for mixers and loaders.

The study group proposal for a six tier classification system can be summarized as follows:

- A. Security Risk: Core exam + category exam + product-specific training + chain of custody (tracking). Applicator must be fully certified and cannot apply under someone else's supervision.
- B. Product-Specific Control: Core exam + category exam + product-specific training. Applicator must be fully certified and cannot apply under someone else's supervision.
- C. Occupational - Full: Core exam + category exam + prior training. May supervise certain applications of pesticides by an applicator who is not fully certified.
- D. Occupational - Limited: Core exam + prior training. May make certain applications under the supervision of a fully certified applicator.
- E. Domestic - Mixable: Must receive and read educational material such as a fact sheet which addresses pesticide safety, rate of application and pesticide storage and disposal.
- F. Domestic - Ready-to-use: No education required?

Additional issues to consider: retailer certification, minimum age by tier, manufacturer controls for Tiers E and F, where to place various agricultural users of pesticides.

Immediate Plan

- Work on Security Risk and Product-Specific Control Tiers (available only to a few people, quantity limits, tracking, chain-of-custody, use reporting, regular inspections, age limits.)
- Put pressure on registrants to improve engineering controls on the Domestic Tiers E and F.
- Use PR Notices to limit formulations of ready-to-use pesticides to small quantities, or to make all domestic products ready-to-use.
- Use the tiered classification system as a means to require written, closed book, monitored exams.
- Study group agreed to continue to work as a subgroup of the Pesticide Safety Workgroup.

Intermediate Plan

- Work on Occupational - Full and Limited Tiers.
- Put engineering control requirements in 40 CFR.
- Clarify 40 CFR requirements relating to testing of private applicators.
- Establish the six tier classification system in 40 CFR.
- Incorporate a scoring matrix in 40 CFR to assign products to a specific tier.
- Encourage pressure by retailers on manufacturers to establish engineering controls.

Master Plan

- Complete work on Domestic - Mixable and Domestic - Ready-to-use Tiers
- Revise FIFRA to allow EPA to establish a classification system for pesticides that reflects security risks (as a means to open FIFRA) and make other classification issues more general to allow EPA to establish requirements and incorporate the details in 40 CFR.

Comments During Tiered Classification Study Group Report

- Some states expressed concern about their ability to enforce a tiered classification system.
- Carl Martin and Carol Ramsay clarified that this proposal is a product classification system viewed from an end-use product perspective.
- Manufacturing level controls, and other controls, may need to be put into place at various tiers in this system.
- One participant raised a concern about “flagging” certain chemicals as a possible means of alerting potential terrorists to which products to go after. After some discussion, the group did not consider this to be a valid argument against a tiered classification system.
- Tier A products would be determined by toxicity or hazard or other criteria that raise security concerns.
- PA requires chain-of-custody controls for Bt products, destined for use over a wide area, as a means of minimizing purposeful contamination of the product.
- Rick Hansen suggested there are a number of things that could be implemented now for high risk/security concern products such as setting a minimum age for use, require specialized training before use, and requiring chain-of-custody record

- keeping and/or use reporting.
- Kathy Dictor (VA) expressed concern for tobacco growers in her state who use fumigants which may be of security interest. Her concern was that growers would face hardships with additional controls.
- One participant expressed concern that the proposed classification idea is too complex and “pie-in-the-sky.”
- Gary Fish advised that the system could be kept relatively simple by ensuring that products are clearly identified by tier on the label and that the label must clearly state any additional requirements such as training, minimum age, chain-of-custody, use reporting, etc.
- Rick Hansen pointed out that the current classification system is overly broad (based on RUP vs. Non-RUP) and difficult to regulate. It is impossible to establish good training requirements in a RUP vs. Non-RUP system. It would be much better to establish training and education requirements based on agreed upon product criteria.
- There was general agreement that the classification system should be tied to certification and training criteria.
- Participants agreed that FIFRA needs to be revised to remove detailed language and be made more general to allow EPA to use 40 CFR as the means of implementing (and revising as necessary) the regulatory program for pesticides.
- Tim Drake (SC) and Liz Braxton (FL) agreed to continue to be actively involved in this issue with the CTAG Pesticide Safety Workgroup.

WPS Integration

The WPS Integration Study Group was facilitated by Kevin Keane with Gina Davis as the Note Taker. Student participants were Dean Herzfeld, University of MN; Gerald Kinro, HI Dept. of Ag.; Thomas Lynch, NY Dept. of Environmental Conservation; Randy Rivera, TX Dept. of Ag.; David Scott, PA Dept. of Ag.; Andrew Thostenson, ND State University; Magda Rodriguez-Hunt, U.S. EPA Region 3; Allan Welch, U.S. EPA Region 10; and, Don Eckerman, EPA Headquarters. Faculty participants were Jack Peterson, AZ, and Richard Pont, EPA.

Issue

Integrate the current WPS training requirements for those in the WPS program who use or recommend the use of pesticides (pesticide handlers, crop consultants, aerial applicators, researchers) with a new applicator training program which would put into one place all of the national pesticide C&T regulations and allow the remaining WPS program to be more tightly focused on the workers who do not handle pesticides.

Advantages

- There is a definite political advantage to simplifying the regulations to move pesticide handlers, crop consultants, aerial applicators and researchers out of the WPS program to concentrate WPS efforts on the workers who remain.
- Provide a tighter focus on seasonal and migrant labor that do not use pesticides.
- Regulatory relief for growers.

- Simplify the WPS program for both growers and inspectors.
- Changes would cause little disruption.
- Pesticide handlers, crop consultants, aerial applicators and researchers are already addressed to some degree in the current C&T program.
- Pesticide safety education and training can be provided “under one (C&T) roof” for the full continuum of pesticide users.
- Provide a more robust infrastructure for handler training that would be supported by growers.

Disadvantages

- Change will be perceived, by some individuals, as wrong.
- Availability of training.
- Difficult to charge a certification fee to some groups such a mixer/loader/handlers.
- Verification of training.

Mixer/loader/handlers - This non-certified “core” group will be the most difficult.

Aerial Applicators - this group can be easily removed from WPS; most states have an aerial category or subcategory.

Demonstration/Research - most states have a demonstration/research category.

Crop Consultants - some states have specific C&T requirements for crop consultants. There are also be other systems in place such as the national Crops Certifying Board.

Methodology

Revise 40 CFR 170 to move the training requirements for handlers, aerial applicators, crop consultants and researchers into 40 CFR 171 (or some other system.)

Implementation can be through a train-the-trainer network in the states, or states can implement a “trainer” category. If a state develops a “trainer” category (with exam), the certified trainer would have the authority to issue a credential verifying the training received by pesticide handlers. The pesticide handler should have some responsibility for pursuing/receiving training and for demonstrating to the employer that the pesticide handler is properly trained.

Issues

- The risk profiles and demographics of the two groups are quite different, essentially professional versus laborers.
- Moving the professional out of the WPS program will lessen the burden on EPA resources which can more effectively be devoted to those remaining in the WPS program
- Tracking of training and card issuance. Who conducts the training? How?
- The system of card issuance is often burdensome. Need to determine who issues cards and how they are to be issued.
- Card authenticity.
- Responsibility should be spread among the SLA, the grower and the handler trainer.

- Funding to implement changes and develop new programs.
- How to shift appropriate amounts of WPS funding to the C&T program?
- How to reach the “agricultural” industries not currently covered by the WPS program?
- Are there ways the states can charge for training to help cover costs?
- Place more responsibility on the pesticide handler population. (Put the burden on the group that wants the job by making training a job qualification.)
- Evaluate/revise the content of handler training.
- Training delivery is oftentimes inadequate, especially when training consists of simply viewing a training video.
- The mixer/loader/handlers need to be addressed as two separate groups, one including those that work for an agricultural grower or commercial applicator and aspire to advance a career, and those that are primarily transient workers without similar career aspirations.
- Agricultural employers with certified applicators on staff may still be able to do training of mixer/loader/handlers.
- For smaller states a trainer network may not be feasible. In these states, the burden will fall on the SLA and CES.

Comments During WPS Integration Study Group Report

- During a discussion of the difficulty of making changes to the WPS program, Kevin Keaney said it should be relatively easy to revise the WPS program to move these groups of pesticide related people out of WPS. The real challenge is how to best move them into the C&T program in a way that assures qualified people using pesticides without causing significant upheaval in state pesticide programs.
- A concern was raised about who will ultimately be responsible for training the non-certified mixer/loader/handlers. If it is not the employer’s responsibility, then whose responsibility? Kevin Keaney responded that the ultimate responsibility for becoming trained rests with the individual who needs to be trained.
- Train-the-trainer programs may provide a better course. A few states now test trainers with a 50 or 100 question exam.
- Issuing and tracking cards is a burden on many states.
- MN now has a spill cleanup program that may be a model for funding training for mixer/loader/handlers. In MN applicator pay an additional fee of \$60 which funds a program to pay for spills that occur primarily during mixing and loading. Currently, however, is funds are available only to clean up the messes, not to pay for training to prevent spills before they occur.

Remote Testing/Language Standards

The Remote Testing/Language Standards Study Group was facilitated by Jeanne Heying. Student participants were Edward Crow, MD Dept. of Ag.; Kathleen Dictor, VA Dept. of Ag.; Gary Fish, ME Dept. of Ag.; Rick Hansen, MN Dept. of Ag.; Carl Rew, IN State Chemist; Diana Roll, OH Dept. of Ag.; John Scott, CO Dept. of Ag.; and Richard Corbett, U.S. EPA Region 4. Faculty participants were Debbie Danford and Donnie Dippel, TX Dept. of Ag. and Jennifer Weber, UC Davis.

Remote Testing (More extensive than just on-line testing.)

Impediments

- The primary issue is how to determine the identity of the person actually taking the exam and how to verify that no cheating is occurring.
- Maintaining security, monitoring the tests.
- Possibility/probability of lost exam fee revenue for state pesticide programs.
- Systems must be designed for neophytes and those not the computer literate.
- How to detect and deal with imposter examinees.
- State procurement requirements and bid processes.
- Union objections involving the loss of work for state employees or forcing reliance on SLA data processing rather than outside programmers with expertise in remote testing.
- Cost, staffing and resources, lack of expertise in remote testing.
- Determining training needs with a new remote testing system.
- Exam conversion from current format to one more consistent with remote testing (e.g., Par Test to LXR.)

Benefits

- Higher level of questions possible.
- Automatic scoring.
- Electronic reporting.
- Immediate results feedback for examinees.
- Technically easy.
- Can integrate training and testing.
- Better item analysis possible.
- Customer convenience.
- Local exam center.
- Increased efficiency in conducting exams.
- Elimination of hand entry of data.
- Reduction in printing and mailing costs by putting more information on the Internet.

Next Steps

- States should develop business plans, which account for all associated costs, to implement remote testing. (Dean Herzfeld example in MN.)
- AAPSE could consider setting minimum standards for on-line continuing education.
- EPA could use grant funding for LXR training, converting exams into LXR or other formats, developing a sample business plan which identifies both hidden costs and direct costs (Dean Herzfeld volunteered to prepare a sample business plan to share with other states.)

Comments During Remote Testing Study Group Report

- Carol Ramsay suggested the framework developed at the PREP course be used as a basis for preparation of a white paper with advantages and disadvantages of remote testing. The white paper could reference states such as MN and VA as good examples.

- Gina Davis pointed out that Tim Creger, NE Department of Agriculture, heads an AAPSE Information Technology Committee that is looking at on-line certification and licensing. Any work of the Pesticide Safety Workgroup should be coordinated with Tim to avoid duplication of efforts.
- Many states would like help putting their current exams into a format, such as LXR 6.0, that is suitable for use on-line.
- States may need to have a mechanism to accept credit card payment for remote testing. MN and ND now accept credit card payment for some products or services.
- Dave Scott (PA) said his agency wrote a program to convert Par Test to an earlier version of LXR; he will make it available to interested states.
- Additional remote testing concerns include: “Is the candidate being coached during the exam?” “Can the exam be duplicated or otherwise compromised by a remote testing candidate?”
- States need advice and guidance for selecting on-line education products and need to be able to see past a slick marketing presentation. National guidelines and educational standards would be helpful. There may be a need for a national clearinghouse for evaluating or assigning CEUs for training.
- How can we determine if remote training meets the same educational standards as face-to-face training?
- Carol Ramsay suggested using the Pesticide Safety Programs (PSP) web site (<http://pep.wsu.edu/psp/>) to post test standards, reviews of on-line training, and similar materials.
- Web site address for Applied Measurement Professionals, Inc. (EPA’s consultant on many exam validation issues) is <http://goamp.com/>
- Web site address for Carl Rew’s program in IN (with information on remote testing) is <http://www.isco.purdue.edu/>

Language Standards

Issues

- Only English language labels have been approved by EPA.
- There is, potentially a huge number of languages to accommodate. What criteria should be used to identify a language that should be accommodated?
- ADA compliance issues. For example, dyslexia should be accommodated when knowledge of pesticide safety is being tested, but not when the ability to read is being tested.
- SLA staff limitations in other languages. This is a particularly difficult issue where practical exams are required and when inspectors deal with individuals who do not speak English.
- If a particular language is accommodated, how should we deal with different dialects?
- There is potentially an unfair advantage given to a candidate using a translator.
- NAFTA Labels may be prepared in a number of languages.
- If exams are prepared in languages other than English, corresponding manuals and other safety and training materials must also be prepared in languages other than

English. This could affect mixer/loader/handlers, dealers, certified applicators, uncertified applicators and others.

- Will the translated exam be equal to the English exam?
- All label questions must deal with an English language label.
- Should we be pro-active or wait for a legislative, judicial or regulatory mandate?
- Should there be national standards?
- Will electronic translation soon become available?
- Pesticide programs need to share resources.
- Jennifer Weber, UC Davis, is conducting an AAPSE survey involving language issues and training materials available in languages other than English. Her survey will include identification of entities now translating training material or conducting non-English training programs. Jennifer will share the results of her survey with the Pesticide Safety Workgroup.

Comments During Language Standards Study Group Report

- Currently setting language standards is a state-by-state decision. States are requested to share their experiences with language standards and issues.
- NC is now translating some applicator certification exams into Spanish, although the labels on the exams remain in English.
- Language standards can represent a “slippery slope.” If a state puts materials into one different language, what objective criteria determine where to stop?
- The Pesticide Safety Workgroup should investigate and determine how other professions are dealing with language issues.

Brainstorming Session on National Consistency for Certification/Recertification Standards - Donnie Dippel, Facilitator; Debbie Danford, Note Taker

Benefits

- Minimum competency standards.
- Better assurance of maintaining competency.
- Minimum standard training.
- Improved security.
- Better reciprocity.

Other Comments

- National consistency must be grounded in positive benefits and not simply be uniformity for its own sake.
- CTAG has taken the lead on this issue with the State Plan Template (which can be used to initiate moves toward consistency) and the white papers on certified applicator age requirements, certified applicator written examination requirements and 50/50 state lead agency match requirement. This should involve the use of monitored, validated, written, closed book exams.
- The state plans can be used by each state to compare levels of progress in specific areas with those of other states.
- The first goal of national consistency should be to bring every state up to the level of

a well determined set of minimum standards. This may require first determining how each state's program operates and then trying to pull them all together to set a minimum bar, or national standard, for certification and recertification. States should still be able to have higher standards.

- Consistency is difficult because of the diversity of state pesticide programs.
- States need/want flexibility.
- Every state deals with essentially the same universe of pesticide products, but testing varies significantly by state.
- Variation in certification or licensing periods ranges from annual to six years.
- Is a state's certification or licensing period driven by availability of resources? Balance the length of certification or licensing periods with available state resources.
- Standardize the requirements that must be met during the certification or licensing periods.
- Set minimum standards for required training.
- National consistency can begin with a recertification program in every state.
- Availability and frequency of training varies by state and region.
- The critical mass for regular or frequent training may not exist in smaller states.
- Minimum standards for certification can include use of monitored, closed book, written exams. The ideal is to change FIFRA to set a general standard and move the battlefield for change to the 40 CFR regulations.
- Minimum standards for recertification can include establishment of a minimum number of hours of training per unit of time (vary CEU requirements by category to reflect that TBT and seed treatment categories, for example, would have different training needs than structural or termite control categories), tougher recertification exams (in part to encourage receiving more training), additional retraining options and separate standards to reflect the differing needs of commercial and private applicators.
- The system needs to reflect other working models for recertification such as in MN which does not use CEUs.
- Recertification training should be based on current or changing technology and business practice rather than on information necessary to pass exams.
- Is the desired "level of competence" attained merely by occupying a seat at a training session?
- Require some form of quiz at the end of training to ensure that information is absorbed?
- "Super events" such as week long training sessions or other forms of highly intensive training may carry more credibility.
- Some industries do a better job of developing training for products (e.g., the Professional Aerial Applicators Support System or PAASS program.)

Brainstorming Session on Security Management for Transport and Storage of Pesticides - Jack Peterson, Facilitator; Carol Ramsay, Note Taker

Delivery of Pesticide Product

- How is on-farm delivery secured? Into secured storage? Dropped off? Who can transport pesticides?
- How should we define “secure” storage?

Storage and Disposal Regulations

- Need to address on-farm, commercial, dealer and bulk storage.
- What are the various state regulations for pesticide storage and disposal? Does there need to be a storage and disposal regulation in every state?
- Some states have not been successful in promulgating storage and disposal regulations.
- Resurrect federal storage and disposal regulations.

Pesticide Purchasing Security

- How to verify legitimate need to purchase? A grower permit or license could be used to demonstrate need.
- Verify employment of purchaser?
- How to address Internet and mail order sales?

Other Comments

- Set minimum standards for transport and storage of pesticides.
- A federal mandate for security issues would help states with legislatures that are reluctant to open up state laws to make changes.
- Currently there is a lack of regulatory control over people who store or transport pesticides.
- Only issue credentials to those who need them. (How to determine need?)
- Conduct some level of background check (e.g., call the home state SLA to verify information in reciprocity requests.) In MD the cost of a criminal background check is \$52. MN is proposing criminal background checks for aerial applicators. The FAA may have some restrictions on convicted felons retaining/receiving a pilot license.
- If a criminal background check is made, what action should be taken when criminal violations show up?
- Should states prohibit certification for convicted felons? Only violent felons?
- Do all states require RUP dealer certification? VA requires insurance as well as certification.
- If we tie security to C&T, what level of training and exam should be required? MD may propose regulation of application equipment storage. This is a contentious issue in AZ and SC.

Possible Action Items

- Determine status/resurrect federal storage and disposal regulations.
- Mandate storage and disposal regulations in all states.
- Incorporate security requirements into dealer certification and licensing.

- Address security issues in the transport of pesticides including “materials stored in the back of the pickup truck during lunch stops.”
- Establish identification requirements for pesticide purchase, transport, storage and disposal.

AAPSE National Pesticide Security Survey

Carol Ramsay and Dean Herzfeld discussed their first draft of a survey instrument for an AAPSE survey of SLA C&T programs and CES PSEP staff to identify current and future program efforts related to pesticide security. Carol and Dean asked for two volunteers to critically review their draft instrument. Gary Fish (ME) and Kathy Dictor (VA) volunteered to review the survey instrument.

Brainstorming Session on Photo ID Requirements for Exams, Recertification and RUP Purchase or Use - Gina Davis, Facilitator; Richard Pont, Note Taker

The primary issues discussed were verification of identification to take an exam or to purchase a restricted pesticide, and the use of a photo on the certification identification card.

Participant Comments

- Controls need to be placed on government issued identification. In some states, numerous agencies issue identification. There needs to be some form of coordination to avoid “agency shopping” to find the easiest-to-obtain identification or to avoid issuing multiple identification cards to the same individual, perhaps under different names.
- Should positive photo identification be required for pre-certification or recertification training? There is reluctance by some states, perhaps related to the resource issue which could imply there are other problems such as maintaining attendance information and issuing certificates of attendance.
- ND requires a signature for participants in training.
- For testing, most participants supported photo identification; however, some states have problems with photos and Amish applicators who may not submit to photos on religious grounds.
- There was general support among participants to require photo identification for recertification training.
- Some states may have limited resources that may prevent checking identification at large recertification training classes where applicators may object to waiting in line.
- Most states appear to set identification requirements through policy and may lack legal authority in laws or regulations.
- Photo identification is only a part of the process. There is a need to verify that the person stayed for the duration of training. There is a need to assure that credit is not given unless identification is verified at the beginning and at the end of training.
- Some states would prefer, as an alternative to a photo on the certification identification card, that the applicator show a valid state photo identification along with the certification card.
- Many participants said they could not handle the financial burden of issuing photo

identifications as part of certification or licensing, but supported verifying certification with a valid state photo identification along with the certification card.

- FL issues an “authorized purchasing agent” card that allows a non-certified person to pick up pesticide products on behalf of a certified applicator.
- NC requires a dealer to verify the person they sell to has a valid certification or license, but NC does not require the dealer to actually inspect the identification; the onus is on the dealer to assure that RUPs are only sold to validly licensed individuals.
- There were some problems identified with the delivery process where a dealer may deliver an order of pesticides to a farm or private applicator without ever seeing identification or a license, especially if the RUPs were delivered to and left in the field or a building on the farm.
- Some states, including NY, require the applicator to have the certification identification card or license on the applicator’s person whenever an application is made. This should be a universal requirement.

Wrap-Up and Discussion of Future Steps - Facilitator: Carl Martin

- There was general agreement that FIFRA needs to be revised to remove detailed language and be made more general to allow EPA to use 40 CFR as the means of implementing (and revising as necessary) the regulatory program for pesticides.
- Tim Drake (SC) and Liz Braxton (FL) agreed to continue to be actively involved in the tiered classification issue with the CTAG Pesticide Safety Workgroup.
- Alan Welch, Jack Peterson, Randy Rivera and Colleen Hudak agreed to work with the Pesticide Safety Workgroup as a WPS subgroup.
- Dean Herzfeld, Ed Crowe, Andrew Thostenson, Diana Roll and Carl Rew agreed to work with the Pesticide Safety Workgroup as a subgroup on Remote Testing and Language Standards.