



# CTAG

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

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## **Progress Report of the Certification & Training Assessment Group *March 2004***

### **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.) Training is sometimes provided by other public or private trainers or organizations.

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**

#### History

The Certification & Training Assessment Group (CTAG) is a consortium of professionals to promote the safe and effective use of pesticides through education, testing and licensing, and enforcement. CTAG was formed in 1997 based on a request by the American Association of Pesticide Safety Educators (AAPSE) to undertake an in-depth study of the pesticide applicator C&T program. The original mission of the group was to look at where the program had been, where it should go, determine the needs, develop a consensus for change and explore changes.

The original CTAG consisted of a body of directors and four teams in the following program areas: content, infrastructure and delivery, evaluation and funding. After collecting information from SLA and CES on their programs, each team developed goals and recommendations in each area. The goals were: 1) reduce the risks to the

public from pesticide use; 2) provide high quality pesticide education and safety training programs; 3) maintain the consistency, integrity and validity of the certification and recertification programs and processes; 4) ensure that adequate and equitable funding is available to pesticide safety education, training and certification programs and 5) improve the efficiency of program organization and operations.

A January 1999 draft report entitled "Pesticide Safety for the 21st Century - The Findings and Proposals of the Certification & Training Assessment Group" was distributed for stakeholder review and comment. Comments were received from SLA certification managers, CES pesticide applicator training coordinators, state pest control associations, private training companies, state farm bureaus, state agri-business associations, chemical companies, agricultural retailers, agricultural aviators, railroad companies, nurseries, state berry growers, and Canada's Pest Management Regulatory Agency (PMRA). Proposals were also discussed during the 1999 National Pesticide Applicator Training and Certification Workshop, a 1999 Pesticide Regulatory Education Program (PREP) course, and at AAPCO/SFIREG and AAPSE meetings.

### CTAG's Purpose

The CTAG Charter establishes CTAG's purpose to be 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, TPPC and federal C&T programs to determine what changes should be considered to improve professionalism of certified applicators and improve State and Federal plans to provide a comprehensive pesticide safety program that will demonstrate competency, mitigate risk, and improve 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, TPPC and federal C&T programs. 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 will determine the current status and future direction of the program, create and coordinate workgroups, provide updates on accomplishments, and maintain a communications network with partners.

Initially, three workgroups were formed to focus activities on specific projects.

- The charge of the State Plan Workgroup is to determine the components of a C&T plan that meet the requirements of FIFRA and the elements of a C&T program that go beyond FIFRA requirements. This workgroup completed its charge during 2003.
- The Pesticide Safety Workgroup is tasked with looking at how the pesticide handler

portion of the WPS program can be incorporated into the current C&T program, as well as to provide EPA with a plan for a comprehensive pesticide safety program, for 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 testing.

- The Tiered Classification Workgroup was formed to propose a pesticide product classification system which tiers the type of user, including occupational and non-occupational users; product characteristics, including level of toxicity or hazard and an assessment of security risk; the level of pesticide education and safety training appropriate or required; certification or licensing requirements; application site characteristics; and engineering or manufacturing controls. This workgroup completed its charge during 2003 by framing a proposed system and detailing the issues surrounding a system of tiered classification. CTAG will eventually create a new workgroup to further develop the tiered classification system.

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

### **CTAG Activities in 2003**

#### CTAG Board of Directors

The CTAG Board of Directors saw some changes in 2003. Two original members of the CTAG Board, former AAPCO President Donnie Dippel and Debbie Danford, both with the Texas Department of Agriculture, left the CTAG Board because of changes in employment. Three new members were elected to the CTAG Board, Jeaneanne Gettle from EPA Region 4, Andrew Thostenson, a CES representative from the North Dakota State University and Kathy Dictor an SLA representative from the Virginia Department of Agriculture and Consumer Services. (On April 1, 2004, Co-Chair Gina Davis, Michigan Department of Agriculture, moved to the Past Co-Chair position; Vice-Chair Carol Ramsay, Washington State University, moved up to the Co-Chair position and Carl Martin, Arizona Structural Pest Control Commission, moved up to become Vice-Chair.)

#### CTAG Presentations

CTAG Board of Directors Co-Chairs Kevin Keaney and Gina Davis, and Vice-Chair Carol Ramsay, made numerous presentations to AAPCO and SFIREG 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 Western Regional Pesticide Meeting, North Central Pesticide Meeting, Northeast regional Pesticide Meeting, the 2003 North American Pesticide Applicator Certification and Safety Education Workshop and the 2003 National Pesticide Stewardship Alliance Conference.

#### C&T Plan Template

The CTAG State Plan Workgroup developed a C&T Plan Template which is 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 process 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.

Programming of the C&T Plan Template is essentially complete. The template is currently hosted on a Washington State University server. Work is in progress to move the template to an EPA server. Use of the template will be included in the FY 2005-2007 Pesticide Cooperative Agreement guidance. A strategy has been developed to assist the EPA regional offices in reviewing C&T plans created with the template.

The state plan template has been successfully beta tested by eight states (MD, MN, NC, ND, NE, TX, VA, UT and WA.) To view the beta test data, go to the template web site (<http://cru.cahe.wsu.edu/candt/logon.cfm>), click on the "Public Access" button, select one of the beta test states, select Report Year 2003 and click the "Next" button.

#### CTAG Issue Papers

*50/50 Match:* This issue paper proposes a change in FIFRA to replace the 50/50 C&T cooperative agreement match requirement with the traditional 85/15 match used in other FIFRA programs. 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 discussed by AAPCO/SFIREG which, in June 2003, agreed to support this issue paper.

*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." clarifications in October 2003. The issue paper was further discussed by AAPCO/SFIREG which, in December 2003, agreed to support this issue paper.

*Positive Identification for Restricted Use Pesticide (RUP) Purchases:* This issue paper 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.) 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 discussed by AAPCO/SFIREG which, in December 2003, agreed to support this issue paper.

*Minimum Age Requirement for Certification:* This issue paper recommends that EPA implement a minimum age requirement for certification as a requirement for approval of state plans. 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 submitted and supported by the POM committee (April 2002) and AAPCO/SFIREG (June 2002) and recommended a minimum of age 18 for commercial applicators and age 16 for private applicators. Because of concerns surrounding taking enforcement actions against minors, the issue paper was redrafted in October 2003 to recommend a minimum of age 18 for both commercial and private applicators. This issue remains under review by CTAG and AAPCO/SFIREG. CTAG is redrafting the issue paper to better describe the advantages and disadvantages of various minimum age requirements and will again solicit input from partners and stakeholders.

Each of these issue papers may be found in the Document Archive on the CTAG web site.

#### CTAG Workgroup on Pesticide Safety

The CTAG Pesticide Safety Workgroup is addressing some of the longer range CTAG goals. The mission of the Pesticide Safety Workgroup is to provide EPA with a new plan for a comprehensive pesticide safety program, for 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 new plan will implement the CTAG goal to incorporate into the C&T program certification and training requirements for WPS handlers, crop consultants, and aerial applicators. This will remove from the WPS program, and place into the C&T program, those who use or recommend the use of pesticides so that the remaining WPS program can be more tightly focused on the agricultural workers who do not handle pesticides. As a result, this will put into one place all of the national pesticide C&T regulations and serve to give pesticide handlers the opportunity for a career path toward becoming a certified applicator.

More information on the Pesticide Safety Workgroup may be found on the CTAG web site at <http://pep.wsu.edu/ctag/PSwg.html>

Current activities of the Pesticide Safety Workgroup includes:

- Development of a draft issue paper on WPS Integration which outlines steps necessary to integrate the pesticide handler training requirements of the Worker Protection Standard into the pesticide applicator certification and training program; preparation of a draft outline of proposed minimum national standards for WPS training, testing and licensing; and, conducting a review of potential economic impacts of WPS integration on State Lead Agency and Cooperative Extension Service programs. The draft papers are under review by CTAG and awaiting initial responses from the EPA Office of Pesticide Programs.
- Preparation of the issue paper on Positive Identification for RUP Purchases, described above. An issue paper on Positive Identification for Pesticide Certification and Recertification Exams and Recertification Training is now being drafted.
- The Workgroup is developing a draft set of issue papers which will identify alternative methods to improve the skills of trainers/educators and explore and suggest possible approaches to provide pesticide safety educators with periodic opportunities to update skills and knowledge through training workshops and information exchange among trainers/educators.
- Draft issue papers are being developed which will identify and examine advantages and disadvantages of remote testing; economics of remote testing including possible loss of revenue to SLA programs; associated costs (both direct costs and hidden costs) to implement remote testing; testing issues, including remote testing, exam security; and possible minimum national standards for testing performed by certification programs (including how and where tests are administered, how they are proctored, and similar issues).
- An Exam Administration and Security Procedures Manual was approved by the CTAG Board in March 2004 and will be distributed to partners and stakeholders in 2004. 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.

#### CTAG Workgroup on Tiered Classification

The Tiered Classification workgroup has accomplished its mission. The workgroup proposed a conceptual framework for a new tiered system of classifying pesticides that would establish education and training requirements covering all occupational users of pesticides and would also address product characteristics, including level of toxicity or hazard and an assessment of security risk, certification or licensing requirements, application site characteristics, and engineering or manufacturing controls. A tiered classification system will be a key element in CTAG's plan for the restructuring of the current certification and training program into a single, comprehensive pesticide worker safety program that covers all types of pesticide users (consumers, homeowners, agricultural users and handlers, and agricultural and non-agricultural occupational users) and incorporates appropriate education, training and examination components to reduce risks to pesticide applicators, other people and the environment. A similar plan is now being implemented by the Canadian PMRA.

Papers developed by the workgroup, which describe the issues surrounding tiered classification of pesticides in detail, have been submitted to EPA for review. Following EPA's review, a new workgroup will be established to build on the strong foundation laid in these papers to carry the tiered classification proposals forward toward implementation.

### Exam Blueprints

EPA is committing funds to perform job analyses for a variety of categories and will begin 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 has begun to work with EPA to develop a process to create a series of exam blueprints for each federal pesticide applicator certification category and facilitate their use by all states, tribes and territories which develop pesticide applicator certification exams.

As states, tribes and territories begin using the new exam blueprints, EPA and CTAG will assess implementation and determine whether additional assistance is needed such as the development of national exams for some of the federal categories.

### North American Pesticide Applicator Certification and Safety Education Workshop

This workshop was held in Honolulu, HI on August 11-14, 2003. CTAG played a key role with many of the workshop presentations devoted to CTAG issues and efforts. Several presentations are available on the workshop web site at:  
[www.pested.psu.edu/nationalepameeting/presentations.shtml](http://www.pested.psu.edu/nationalepameeting/presentations.shtml)

Workshop presentations included a session on CTAG's progress and successes in implementing recommendations in the "Pesticide Safety for the 21<sup>st</sup> Century" report; discussion of CTAG issue papers (SLA funding ("50/50 Match"); Requiring Monitored, Written, Closed-book Exams; Positive Identification for Restricted Use Pesticides Purchases; and, a Minimum Age Requirement for Certification); a presentation and discussion of the papers developed by the CTAG Workgroup on Tiered Classification; a session on CTAG work on positive identification and on exam security; and a presentation of the Web-based C&T Plan Template.

Another important session was a roundtable discussion on "Where Do You Think CTAG Should Focus Its Energies?" This session yielded important feed back from CTAG partners and stakeholders which will be used to help direct CTAG activities. The session showed support for developing guidelines for approving pesticide training courses covering course content, how to handle issues of commercialization (speakers who promote their own products as "training"), setting trainer/speaker qualifications and how to evaluate qualifications, how to evaluate educational degrees versus years of training/experience and how to properly monitor training; facilitating reciprocity and

more uniformity among the states to make for easier reciprocity; and more guidance documents that can help raise the level of all state, tribal and territorial pesticide programs.

An important outcome of this workshop was the realization that CTAG needs to improve its communication and outreach efforts. Consequently, CTAG agreed to develop a “process paper” which will detail the process followed for the issues that CTAG addresses; how issues and projects develop; and how and when CTAG solicits comments by its SLA, CES, Tribal, Federal C&T program, and EPA partners.

#### PSEP Long-term Funding

In August 2003, CTAG committed to establishing a new workgroup to develop a process for distributing Pesticide Safety Education Program (PSEP) funds. This workgroup was proposed to look at the formula and the process for distributing funds to PSEP and identify conditions for maintaining the accountability of funds. When this issue was discussed at the March 2004 CTAG Board meeting, EPA and USDA representatives reported had they had resolved most of their issues regarding the Interagency Agreement for passing money through to Cooperative Extension and that EPA is currently not considering an alternate disbursement route. Consequently, CTAG decided to revise the scope of work for the proposed workgroup. CTAG will form the new workgroup once a scope of work has been determined.

#### **Additional 2003 EPA and USDA Efforts Related to C&T**

##### Core Exam Development

EPA and Canada’s PMRA are collaborating on a pesticide applicator core exam project. Several states and provinces have volunteered to participate in the pilot phase of the project and use the two exam forms as a credentialing tool in their respective states and provinces. The pilot phase will use the new national core manual, now nearing completion, 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.)

##### Core Manual Development

The core manual project, which is a companion to the core exam project, will result in a national pesticide applicator study manual to prepare candidates for the national core exam. The national core manual is based on the same blueprint as the national core exam. The core manual is being edited by a group consisting of Carolyn Randall, Michigan State University Extension, Winand Hock, Pennsylvania State University & current AAPSE President, Edward Crow, Maryland Department of Agriculture, Colleen Hudak-Wise, North Carolina Department of Agriculture and Jeanne Heying, EPA Office of Pesticide Programs. Draft chapters of the core manual are now being reviewed by a

Core Manual Review Committee which includes Edward Crow; Thomas Delaney, Professional Lawn Care Association of America; Jeanne Heying; Winand Hock, ; Colleen Hudak-Wise; Monte Johnson, USDA CSREES; Mary Ketchersid, University of Texas Cooperative Extension; Lori McKinnon, TPPC; Patrick O'Connor-Marer, University of California-Davis, IPM Education; Troy Pierce, EPA Region 4; Carol Ramsay, Washington State University; Carolyn Randall; Carl Rew, Indiana State Chemist Office; and, William Tozer, Armed Forces Pest Management Board. The national core manual is expected to be completed and available for general use in late 2004.

#### WPS Train-the-Trainer Project

The Worker Protection Standard (WPS) train-the-trainer pilot workgroup has developed a train-the-trainer manual for field workers with input from workgroup members and from other training manuals. As part of this project, nine master trainers were trained in March and April, 2003, two from FL, three from NJ and four from WA. The master trainers then conducted training in their respective states. Each of the three states then trained approximately 15 English speaking and 15 Spanish speaking trainers.

#### USDA Efforts

USDA supported the Pesticide Safety Education Program (PSEP) by allocating \$425,000 of "end-of-year" monies in FY 2003 to supplement pass-through funds provided by EPA.

Funding issues during FY 2003 resulted in significant reductions in funding for PSEP. USDA and EPA continued efforts to resolve these funding issues to ensure that PSEP receives continued financial support.

The Spray Table Demonstration Project headed up by Dr. Bob Wolf at Kansas State University was allocated \$25,000 through the USDA/CSREES IPM Program. 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. The kits, which are expected to be distributed by Spring 2004, will include a self-enclosed table with pump, boom and nozzle body assembly and spray pattern collector; a variety of spray tips and special accent lighting to help emphasize spray tip characteristics. The kit will also include a short video and instruction manual. A special presentation to introduce and demonstrate the table will be given at the North Central Region Pesticide Education and Certification Workshop in St. Louis, Missouri in June.

Other USDA/CSREES activities included allocation of \$5000 for the Southern Region Pesticide Safety Education Center program for FY2004 and \$5000 of FY2004 monies for the October 2004 International Spray Drift Conference in Hawaii. USDA also prepared a "Quarterly PSEP Update" that was sent to all PSEP Coordinators, and managers of the "Drifters" listserve for the National Coalition On Drift Minimization.