

Pesticide Applicator Recertification: Addressing Both Core and Category Topics in Training

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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 Both 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 Pesticide Applicator Recertification: Core & Category Training Requirements

discusses what constitutes Core and Category-specific training and suggests benefits of providing recertification training in both areas. This paper does not discuss requiring both content areas to be covered nor how a state might choose to implement such a requirement.

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 several questions about including both Core and Category-specific topics in recertification training, two of which will be addressed in this paper:

- Is it possible to identify what is a Core topic and what is a Category-specific topic?
- Are Core topics relevant in recertification training?

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 for homeland security, it would be unconscionable NOT to remind certified applicators and pesticide dealers of the importance of chemical security and steps they can take to ensure it.

Summary

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. CTAG also endorses state flexibility in achieving that balance.

A future guidance document in this series will discuss how a state can balance Core and Category-specific training within its recertification structure. It will also provide 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.