

CTAG Recertification Webinar Workgroup: Scoping Document- Draft 6.18.20

Workgroup Recruitment:

- Current CTAG Members: Lindsey House (WSDA), Amanda Couture (Maine Dept. Ag), John Feagans (NCDA&CS), Mike Helms (Cornell), Linda Johns (UMN)
- PSEP: Becky Maguire (WSU)

EPA Contacts for Input:

- Jeanne Kasai

Background:

To comply with EPA's Certification and Training rules, states must require pesticide license holders to recertify their license regularly to show continued competency. Many states allow obtaining continuing education credits as a method for licensees to recertify. Especially in light of current restrictions on in-person gatherings to protect public health, more questions are arising regarding options for license holders to obtain their credits at home. Webinars are one potential option. For the purpose of this CTAG workgroup, the term "webinar" will refer to live proctored events delivered via the internet and scheduled for a specific date and time. These could include both pre-recorded and live presentations, but are monitored by the sponsor in real-time. Issues related to asynchronous, on-demand internet courses will be addressed by a separate CTAG workgroup.

CTAG understands that allowing webinar recertification could present states with a multitude of challenges. To comply with federal requirements, each state has their own recertification standards that must be met, and these could be either by policy, rule or regulation. States will have to define what parameters a webinar recertification course must meet in order to meet their standards. Further, EPA has recently updated 40 CFR Part 171, creating the "New" Certification and Training rule and states must have plans approved that detail how they are meeting or exceeding these standards. The new rule requires states to verify successful completion of recertification courses, including the identity of candidates for recertification, though there is no specific requirement to verify identity based on a government issued photo ID (40 CFR 171.103(a)(2)(iii)). EPA must review state standards for recertification to ensure that federal standards are met, but states have been given no specific guidance on if/how webinar recertification is allowable.

States also have different guidelines and methods for sponsors to request credit approval for a course. With no travel needed, webinar recertification courses could potentially be offered to licensees in many different states, giving licensees a much greater variety of continuing education. However, the cumbersome process of requesting credit in multiple states all with different requirements may be a deterrent to course sponsors.

CTAG Workgroup Goals:

- Review potential pros and cons of allowing webinar based recertification courses
- Suggest standards for states when verifying identity of attendees and active participation
- Obtain official guidance from EPA on what identity verification methods would be acceptable under new federal rule
- Provide a resource for webinar course sponsors to make it easier for them to request credits from multiple states
- Suggest method for standardized process for approving webinar courses amongst states
- Determine the potential for course approval reciprocity, particularly within regions, and facilitate if possible

Resources to Provide:

- Living guidance document to share our findings, to be updated as we gather new information