



CTAG

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

Certification and Training Assessment Group (CTAG)

Board of Directors Meeting

June 12-13, 2013

Meeting Summary

The CTAG Board of Directors met in Arlington, Virginia on June 12-13, 2013. The following Board members attended the meeting: Ples Spradley, Kevin Keane, Laurie Gordon, Thia Walker, Katy Wilcoxon, Don Renchie, Richard Pont, Carol Black, Mark Robson, Gary Fish, Jack Peterson, Leo Reed, Betsy Buffington, Marty Pousson, and Michelle Arling. EPA staff Jeanne Kasai, Kathy Davis, Nancy Fitz, Nicole Zinn, Kristen Hendricks, and Jay Ellenberger attended parts of the meeting.

1. New members

Three Board members' terms expired in March 2013 – Gary Fish, Joe Spitzmueller, and Dan Wixted. Faye Golden left her position at the Alabama Department of Agriculture and resigned from CTAG. CTAG welcomed three new members: Laurie Gordon, Oregon Department of Agriculture; Marty Pousson, Louisiana Department of Agriculture; and Thia Walker, Colorado State University. In addition, the Board elected Gary Fish for another 3-year term.

2. Liaisons with Associations

Two of the departing members served as liaisons to other organizations, sharing CTAG news and bringing back news from the other organizations to CTAG. Betsy Buffington has replaced Dan Wixted as the AAPSE liaison. Leo Reed has agreed to replace Jack Peterson as the AAPCO liaison. Jack Peterson is the ASPCRO liaison. Leo Reed agreed to serve as the SFIREG liaison as well. Katy Wilcoxon has agreed to serve as the EPA Regional liaison.

3. Liaison Reports

Betsy Buffington provided the report from AAPSE. AAPSE is still discussing whether to hold a standalone meeting, potentially in the years when PACT does not occur and in conjunction with a regional meeting. AAPSE is trying to broaden membership base and is considering changes to categories/fees for membership. Elections will occur this summer for AAPSE leadership positions (secretary, president-elect).

AAPSE has participated actively in the PSEP funding stakeholder workgroup. AAPSE supports EPA's efforts related to PSEP funding, such as reaching out to stakeholders, participating in the stakeholder meeting, and working with NASDARF to distribute the 2013 PRIA funds. They hope that EPA can have a vehicle in place to distribute the 2014 funding. AAPSE supports the expansion of CPARD to include PSEP reporting .

An AAPSE workgroup is drafting an issue paper on minimum risk pesticides to send to the EPA administrator.

AAPSE is hosting several events at PACT 2013. The AAPSE Board meeting on Sunday, August 4 is open to all members. AAPSE is sponsoring a reception for all PACT 2013 attendees on Monday, August 5 after the tour. On Wednesday, August 7, AAPSE is holding a business meeting.

Jack Peterson provided the report from AAPCO. At the meeting in March 2013, CTAG was on the agenda. Kevin Keaney gave an update and Jack followed up with a presentation on what tools CTAG has developed. The AAPCO president and incoming president of the National Association of State Departments of Agriculture are both from Vermont. They hope that the overlap in leadership will result in more recognition of the importance of pesticide applicator certification programs within state departments of agriculture.

4. EPA Update

Kevin Keaney provided the EPA update. The WPS package (preamble, proposed revisions, economic analysis) has completed internal EPA review. EPA sent the package informally to USDA for review and briefed a large group of interested USDA staff. The next steps are to provide the package to USDA formally, and then to the Office of Management and Budget. EPA has a briefing scheduled with the Occupational Safety and Health Administration next week to describe the changes to the WPS under consideration, and will likely have similar briefings with other interested federal agencies. The certification rule is not as far along as the WPS. EPA needs to complete the economic analysis for the proposal and go through the internal review process.

EPA plans to engage broad networks of stakeholders when the proposals are issued. The AAPCO workgroup on the regulatory changes already requested a 1-2 day meeting with EPA when the proposal is issued to learn more about what EPA is proposing and why in order to communicate better with stakeholders in the field and to provide more informed comments. EPA has developed relationships with staff in USDA's Office of Advocacy and Outreach and at the White House who are interested in supporting and moving both rules forward.

The Acting Assistant Administrator, Jim Jones, has gone on three field tours to learn more about agriculture. With staff from the Office of Pesticide Programs and EPA Regions, he visited state regulators, growers, farmworkers, advocacy organizations, health care providers, and others in North Carolina, Michigan, and Florida.

EPA and USDA no longer have an Interagency Agreement to distribute PSEP funding to university extension. The funding available for PSEP from EPA has declined substantially over the past decade. Currently, and for the foreseeable future, EPA anticipates only having the funds available under PRIA to support PSEP programs (\$500,000).

EPA is working with NASDARF and Anugrah Shaw on a project to establish risk-based PPE requirements. A symposium last year in Brazil brought together international stakeholders interested in developing PPE standards. A follow up will be held this year in October in Greece.

5. Internal & External Marketing

This workgroup's purpose is to develop materials to market the certification program internally (up the management chain) and externally. A brochure aimed at stakeholders (PSEP funding group, pollinator protection committee, industry) was brought to the Board for approval. The goal is to have the document revised and ready for distribution at PACT 2013. The document will be posted on the

CTAG and NASDARF websites. The co-chairs will email program partners (AAPSE, AAPCO, SFIREG, ASPCRO, PSEP) to make them available of this document. An editable version of the document will be made available upon request so that state-specific information can be added.

The workgroup is also developing a webpage for new employees on the CTAG website. The website would include useful resources, such as orientation presentations given at PACT and PREP, overviews from NPIC, an acronym list, guidance on using CPARD, and other information.

6. Collaboration/Bringing Research into Training

The workgroup has developed a draft paper on collaboration. The document could be useful for new employees to learn about what resources, people, and programs are out there to work with. Suggested resources outside of the certification program include agricultural engineers, economists, health care providers, and others who are doing work that relates to pesticide use. The Board agreed to revise the focus of this paper into a resource paper for people new to the certification and training program.

7. Program Impacts/Mentoring

NASDARF noted that it is looking for ways to encourage collaboration between the states, including sharing experience, learning how other states work, and improving networking. NASDARF is considering an exchange program where a person would spend a week working with a program counterpart. The host/mentor could use the experience as professional/leadership development, and the visitor could learn how another program works.

The Board will distribute a job analysis survey at PACT 2013 that will help NASDARF know what information people need and who has and is willing to share experience in that area.

8. Non-Agricultural Pesticide Safety Education Needs

This workgroup's task is conduct a needs assessment related to the turf and ornamental category. CTAG continues to hear that turf and ornamental is a growing area of certification in the states and needs to determine what role to play. The workgroup revised the survey based on the feedback provided at the last meeting. The will be distributed before PACT 2013. The group will have results to discuss at the next meeting.

9. Core Exam Security Agreement

NASDARF developed exam item banks for core, aerial, right of way, and soil fumigation. To access the item banks, the state regulatory agency must sign a security agreement with EPA. In order to preserve the integrity of the exams and to promote broader use, states need to have confidence in the security agreement. NASDARF suggested that the exam security agreements need to be updated to more explicitly address exam security and the changing field of exam administration such as using 3rd parties to administer exams.

A workgroup agreed to review and update the current exam security agreements, and may develop an issue paper related to exam security and administration

10. Tribal Certification Plan

EPA's Office of Pesticide Programs attended the meeting to discuss the Federal Certification Program in Indian Country. Under the current regulation, people applying RUPs in Indian Country do not have to be certified if there is not a mechanism available to certify them. State-based certificates are not valid on Indian lands unless the state and tribe have a written agreement. Only 4 tribes administer their own certification program and EPA administers a certification program for the Navajo tribe. This program would allow EPA to certify people making applications in Indian Country based on an existing state certification. Alternatively, someone without a state-based certification seeking private applicator certification would be allowed to certify using a non-test option because under FIFRA EPA cannot require private applicators to take an exam to become certified.

The non-test certification would be based on the existing narrated PowerPoint for core certification with an additional module on tribal-specific requirements. The presentation would include 2-3 pop up windows with a code that the person seeking certification would need to copy down and submit with the certificate of completion in order to get certified. The code is intended to ensure that the person is paying attention to the training. The Board requested that EPA clearly indicate that this is EPA training, not endorsed or provided by any state pesticide applicator certification program.

The federal plan would be in place until the certified applicator rule is revised, at which point the federal plan may need to be revised to match the proposed changes. The Board suggested implementing a federal plan for tribal certification when the applicator certification rule is implemented in order to minimize confusion for applicators and burden on administrators. The need for a workable tribal certification option could be used to move the applicator rule forward more quickly.

EPA wants to require the applicator to submit a copy of the state certification, but some states do not issue a hard copy certificate. Another question raised is how EPA will know if the state-based certification is revoked. EPA believes that the states and EPA will communicate about suspensions, but there is no formal mechanism in place. The states do not want the additional burden of tracking which applicators are also certified to apply in Indian country and notifying EPA anytime an action is taken against them.

Another issue is the purchase of RUPs. Some states require dealers only to sell to applicators that have a valid state pesticide applicator certification. Applicators seeking to apply on tribal land who present a federal, not state, certification will not be able to purchase RUPs in some states. Dealers will need to be educated, and state regulators may get more inquiries about how to handle sales to people applying to tribal lands as a result of the federal plan.

EPA is looking for ways to communicate to applicators the new Federal certification requirement for applying RUPs on tribal lands and the fact that tribes also may have tribal-specific requirements. EPA would like states to communicate the requirements to applicators during training programs. Some states said they could share a simple, direct message as part of credential renewal mailing. CTAG suggested working with the National Pest Management Association and associations for applicators on rights of way and mosquito control.

EPA plans to get the plan/training program implemented in late summer 2013. To assist with issues that arise during implementation, EPA is forming a workgroup with representatives from EPA HQ and regions, state lead agencies, tribes, CTAG, and AAPSE.

The Board will discuss the status of the federal certification program at the next meeting.

11. PSEP Stakeholder Team

For several months, a PSEP Stakeholder Team has been looking at ways to support and make sustainable state PSEP programs. The Stakeholder Team has reviewed information on state PSEP programs, such as whether the program receives funding from manual sales and training programs, or from the state regulatory agency/enforcement fines/fees. The Stakeholder Team's ultimate goal is to help PSEP programs be self-sustaining, so variations in federal support are not devastating to the programs. The Stakeholder team wants to learn what prevents some programs from doing cost recovery and work with them to overcome the impediments. The Stakeholder Team will be having a discussion at the PACT 2013. More information about this effort is available on <http://psep.us>.

12. Clean Sweep Report Update

In 2001, EPA compiled a nationwide summary of Clean Sweep programs based on information provided voluntarily by States and some counties.

(http://www.epa.gov/oppfead1/cb/csb_page/updates/cleansweep.pdf). Recently the Pesticide Stewardship Alliance (TPSA) collected basic information on pesticide collection and disposal programs. and consensus emerged that an update to the original Clean Sweep report is needed. EPA would benefit from having a national picture, states would benefit from learning how other states administer collection and disposal programs, and hazardous waste disposal contracts would get a clearer idea of what is happening nationally.

TPSA is developing a database that state Clean Sweep coordinators could populate. The database would be similar to CPARD – a national repository for information that could be used to provide information on what is happening nationally with pesticide disposal. OPP staff sought CTAG's input the process for setting up the database, budget/timeline, and general input. Regarding the process for setting up the database, CTAG suggested that all interested stakeholders be engaged from the beginning. CTAG pointed out that the success of CPARD is partly because there is always a point person that can assist states in the event of trouble with data entry. CTAG strongly suggested the development of an instruction manual to walk users through the whole data entry process.

13. Soil Fumigation Status

OPP staff provided an update to CTAG. Soil fumigation labels went into effect December 1, 2012. 10 states have requested EPA approval of a certification program/exam to be used in lieu of the registrant-provided training required by the product labeling. In addition, 8 states have requested the soil fumigation exam item bank but have not yet requested EPA approval of a certification program/exam to be used in lieu of the registrant-provided training.

CPARD can report the number of people certified for soil fumigation in states that have adopted a certification requirement in lieu of the registrant training. States can find out if a specific person has received training from the registrant by calling the company, but there is no comprehensive collection of data on the number of people trained. CTAG requested that EPA provide the information at the end of the year if possible.

14. PPE Efforts

EPA and NASDARF have been discussing with Anugrah Shaw (University of Maryland Eastern Shore) the concept of risk-based PPE requirements and providing a simple, clear expression of the PPE required on the labeling. There is international interest in this topic because countries are concerned with the effects of PPE in hot weather. Europe has been discussing standards for various types of PPE. Standard setting bodies are working on establishing international standards for several types of PPE (gloves, garments). In 2012, Anugrah Shaw, NASDARF, EPA, and state regulators attended an international symposium on PPE in Brazil. A second symposium is scheduled for October 2013 and will focus on exposure databases, risk assessment, and various levels of protection. Kevin Keaney is working internally to raise the issue of risk-based PPE and the importance of clear expressions on labeling internally at EPA.

Anugrah Shaw is also working on glove penetration tests. The old data is based on thick gloves from the 1980s. The new studies use gloves of different thicknesses and show that much thinner gloves may provide sufficient protection. The data should be available soon.

Work is also underway to update EPA's Label Review Manual related to glove type. The current language is based on the chemical resistance categories selection chart. This chart does not differentiate based on the pesticide formulation. The revisions will make clear when a waterproof (vs. chemical resistant) glove will work. The revisions also consider differences between glove types for short- and long-term activities. The specific chapter of the Label Review Manual will be released for public comment, and EPA requests specific comments from state regulators and educators.

15. Americans with Disabilities Act (ADA) Issue Paper

CTAG developed a draft paper describing what state certification programs should consider related to ADA requests for accommodation as part of a certification exam. CTAG initiated this discussion after inquiries from states at the exam development workshops. A revised paper will be distributed for stakeholder comment before PACT 2013. ADA in certification programs is a topic on the PACT agenda.

16. NASDARF Update

NASDARF activities include printing of the 6th edition of Recognition and Management of Pesticide Poisoning, development of a seed treatment manual, a turf and ornamental syllabus, updates to the aerial item bank, and potential revisions to the core manual. NASDARF is working with EPA to polish a presentation on Rozol that will be distributed to all states, but is not a required element of any training program.

NASDARF is looking for ideas to build on the exam development workshops. CTAG will collect ideas for other areas in which states could benefit from workshops, such as exam item analysis and the expert panel/workgroup process. CTAG suggested other non-exam related topics, such as communicating about risks, toxicity, PPE, and misconceptions; online training/recertification programs; and how to set up hands-on clinics, especially for drift. Anyone with ideas for workshops should send them to NASDARF.

17. Dicamba Issues

Dicamba and 2-4 D resistant crops are a big issue in some states because the products do not harm the resistant crops, but off-target applications (adjacent field or drift) or inversion-related drift can be extremely destructive to non-resistant crops. USDA is doing environmental studies on the effects of the resistant crops and Monsanto and Dow are sponsoring meetings in the Southeastern US. CTAG

suggested that the AAPSE liaison communicate concern about this issue and the need for training for educators and applicators to AAPSE. CTAG also recommended that EPA consider how to get this message out to inspectors. Some states have innovative programs that can assist inspectors in assessing/establishing damage to crops that could be used by other states. This issue is on the agenda for PACT 2013.

18. Webinars for Recertification Credits

CTAG discussed the issue of using webinars for recertification credits. As resources are limited, including staff and travel funds, distance education is a way to reach many applicators without leaving the office. However, there are concerns with awarding credits without visually verifying attendance.

A CTAG workgroup will develop a paper on this topic. The goal is to have a paper ready by the next CTAG meeting.

19. Globally Harmonized System (GHW)

CTAG discussed the issue of GHS related to pesticides EPA Pesticide labels are not changing to incorporate GHS elements, but the Safety Data Sheets required by OSHA will. As a result, educators may have to explain that the symbols and signal words on the SDS's and pesticide labels may be different. OSHA regulations require employers to train all employees on the new SDS requirements by the end of 2013. OSHA has made available a training powerpoint about the new SDS training requirement that is available on its website.

20. CTAG Accomplishment Report

A report of CTAG's accomplishments from 2011-2013 is expected to be ready for distribution at PACT 2013.

21. Pesticide Applicator Recertification: Examples Pertaining to Addressing Both Core and Category

The Board will review the revised document a final time (comments due June 21) and a final paper will be posted to the CTAG website and distributed to stakeholder groups.

22. CPARD Update

The web designer is making the final edits to CPARD and it will be updated soon. Work is also underway to finalize PSEP reporting in a parallel system.

23. CTAG Next Meeting Dates

CTAG will meet November 5-6, 2013 at a location TBD. The Board is holding June 24-26, 2014 for the following meeting.