

Q1 Indicate your State/Tribe/Territory

Answered: 31 Skipped: 0

#	RESPONSES	DATE
1	Mississippi	1/18/2023 3:47 PM
2	Nevada	1/12/2023 2:00 PM
3	Arkansas	1/12/2023 1:13 PM
4	State of Hawaii	1/12/2023 1:12 PM
5	hawaii	1/12/2023 1:11 PM
6	Oregon	8/17/2022 4:52 PM
7	Vermont	8/17/2022 4:03 PM
8	Pennsylvania	8/17/2022 9:45 AM
9	New Hampshire	8/17/2022 8:19 AM
10	Virginia	8/10/2022 10:19 AM
11	State of Alaska	8/8/2022 4:38 PM
12	Georgia	8/8/2022 1:41 PM
13	Alaska	8/8/2022 12:06 PM
14	Missouri	8/8/2022 12:03 PM
15	Florida	8/8/2022 11:26 AM
16	District Of Columbia	8/8/2022 10:59 AM
17	Delaware	8/8/2022 10:34 AM
18	Washington.	8/5/2022 5:10 PM
19	Nebraska	8/5/2022 9:43 AM
20	Wyoming	8/4/2022 11:00 AM
21	Alabama	8/3/2022 3:04 PM
22	North Carolina	8/3/2022 9:16 AM
23	Texas	8/2/2022 6:02 PM
24	Utah	8/2/2022 2:21 PM
25	Oklahoma	8/2/2022 12:58 PM
26	Ohio	8/2/2022 8:24 AM
27	Massachusetts	8/2/2022 8:23 AM
28	Minnesota	8/2/2022 8:04 AM
29	Mississippi	8/1/2022 6:07 PM
30	South Carolina	8/1/2022 5:02 PM
31	Arkansas	8/1/2022 4:10 PM

Q2 Agency Name

Answered: 31 Skipped: 0

#	RESPONSES	DATE
1	Mississippi Department of Agriculture and Commerce - Bureau of Plant Industry	1/18/2023 3:47 PM
2	Nevada Department of Agriculture	1/12/2023 2:00 PM
3	Arkansas Department of Agriculture	1/12/2023 1:13 PM
4	State of Hawaii Dept. of Agriculture Pesticides Branch	1/12/2023 1:12 PM
5	hawaii dept. of agriculture	1/12/2023 1:11 PM
6	Oregon Department of Agriculture	8/17/2022 4:52 PM
7	Vermont Agency of Agriculture, Food and Markets	8/17/2022 4:03 PM
8	PA Dept of Agriculture	8/17/2022 9:45 AM
9	Division of Pesticide Control	8/17/2022 8:19 AM
10	Virginia Department of Agriculture and Consumer Services	8/10/2022 10:19 AM
11	Department of Environmental Conservation	8/8/2022 4:38 PM
12	Georgia Department of Agriculture	8/8/2022 1:41 PM
13	DEC	8/8/2022 12:06 PM
14	Mo Dept of Ag	8/8/2022 12:03 PM
15	Florida Department of Agriculture and Consumer Services	8/8/2022 11:26 AM
16	Department of Energy and Environment	8/8/2022 10:59 AM
17	Delaware Department of Agriculture	8/8/2022 10:34 AM
18	Washington State Department of Agriculture , Pesticide Management Division	8/5/2022 5:10 PM
19	Nebraska Department of Agriculture	8/5/2022 9:43 AM
20	Wyoming Department of Agriculture	8/4/2022 11:00 AM
21	Alabama Department of Agriculture & Industries	8/3/2022 3:04 PM
22	N.C. Department of Agriculture & Consumer Services-Structural Pest Control & Pesticides Division	8/3/2022 9:16 AM
23	Texas Department of Agriculture	8/2/2022 6:02 PM
24	Utah Department of Agriculture and Food	8/2/2022 2:21 PM
25	Oklahoma Department of Agriculture, Food, & Forestry	8/2/2022 12:58 PM
26	Ohio Department of Ag	8/2/2022 8:24 AM
27	Department of Agricultural Resources	8/2/2022 8:23 AM
28	Department of Agriculture	8/2/2022 8:04 AM
29	The Bureau of Plant Industry	8/1/2022 6:07 PM
30	Clemson University DPR	8/1/2022 5:02 PM
31	Arkansas Department of Agriculture	8/1/2022 4:10 PM

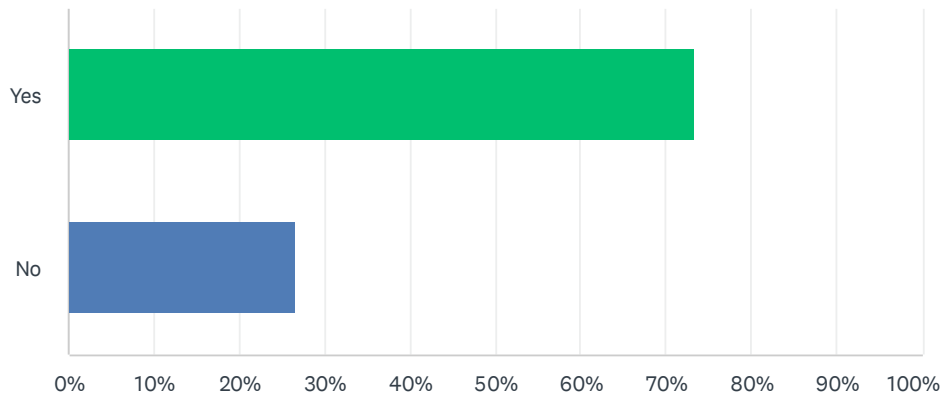
Q3 Agency Website Address

Answered: 31 Skipped: 0

#	RESPONSES	DATE
1	https://www.mdac.ms.gov/bureaus-departments/plant-industry/	1/18/2023 3:47 PM
2	agri.nv.gov	1/12/2023 2:00 PM
3	agriculture.arkansas.gov	1/12/2023 1:13 PM
4	https://hdoa.hawaii.gov/pi/pest/	1/12/2023 1:12 PM
5	https://hdoa.hawaii.gov/	1/12/2023 1:11 PM
6	https://www.oregon.gov/oda/programs/Pesticides/Pages/default.aspx	8/17/2022 4:52 PM
7	https://agriculture.vermont.gov/	8/17/2022 4:03 PM
8	www.agriculture.pa.gov	8/17/2022 9:45 AM
9	www.agriculture.nh.gov/divisions/pesticide-control/index.htm	8/17/2022 8:19 AM
10	https://www.vdacs.virginia.gov/	8/10/2022 10:19 AM
11	https://dec.alaska.gov/eh/pest/	8/8/2022 4:38 PM
12	www.agr.georgia.gov	8/8/2022 1:41 PM
13	https://dec.alaska.gov/	8/8/2022 12:06 PM
14	Agriculture.mo.gov	8/8/2022 12:03 PM
15	fdacs.gov	8/8/2022 11:26 AM
16	doee.dc.gov	8/8/2022 10:59 AM
17	https://agriculture.delaware.gov/pesticide-management/	8/8/2022 10:34 AM
18	www.agr.wa.gov	8/5/2022 5:10 PM
19	nda.nebraska.gov	8/5/2022 9:43 AM
20	https://wyagric.state.wy.us/	8/4/2022 11:00 AM
21	www.agi.alabama.gov	8/3/2022 3:04 PM
22	www.ncagr/spcap/structural/	8/3/2022 9:16 AM
23	www.texasagriculture.gov	8/2/2022 6:02 PM
24	ag.utah.gov	8/2/2022 2:21 PM
25	ag.ok.gov	8/2/2022 12:58 PM
26	www.agri.ohio.gov	8/2/2022 8:24 AM
27	https://www.mass.gov/orgs/massachusetts-department-of-agricultural-resources	8/2/2022 8:23 AM
28	https://www.mda.state.mn.us/	8/2/2022 8:04 AM
29	https://www.mdac.ms.gov/bureaus-departments/plant-industry/	8/1/2022 6:07 PM
30	www.clemson.edu/public/regulatory/pesticide-regulation/	8/1/2022 5:02 PM
31	agriculture.arkansas.gov	8/1/2022 4:10 PM

Q4 Does your state define registered/trained technicians?

Answered: 30 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	73.33%	22
No	26.67%	8
TOTAL		30

Q5 If your answer to Question 4 was yes, please provide the statutory definition of registered/trained technician.

Answered: 25 Skipped: 6

#	RESPONSES	DATE
1	Registered Technician shall mean a bona find employee of a license holder who has completed the verifiable training as described in subsection 114.02 of this chapter and who has obtained a registered technician identification card from the Bureau.	1/18/2023 3:47 PM
2	NRS 555.2619 "Commercial applicator" defined. "Commercial applicator" means an applicator who is licensed to apply or supervise the application of any general-use pesticide for hire or for profit. NRS 555.26157 "Authorized commercial applicator" defined. "Authorized commercial applicator" means an applicator who for hire or for profit is licensed to apply or supervise the application of any general-use pesticide and who is authorized to apply or supervise the application of any restricted-use pesticide pursuant to NRS 555.351.	1/12/2023 2:00 PM
3	<p>5. Agent Training, Examination, and Registration: Registered agents must be a minimum age of eighteen (18). License holders of classifications 1, 2, 3, 4, 5 or 6 shall register with the Plant Board all individuals employed by them for the purpose of performing pest control services, including those employed for solicitation as their agent. Clerical staff are excluded. Each agent shall be registered only in the classification of pest control for which the license holder is licensed to perform. Agent trainees must be on-the-job trained by the license holder within 20 working days of their employment. Within 45 working days of their employment and after the completion of the on-the-job training the agent trainee must take an exam administered by the Plant Board, or a representative appointed by the Plant Board. Registered agent exams will be given on Wednesday of each week at a time and location designated by the State Plant Board. In the event of technological advances that allow for changes in the administration of the exams, circumstances beyond the control of the State Plant Board occur, or any of the designated dates occur on a day, when State offices are closed, the Director of the State Plant Board may designate alternate dates for the examinations. Until registered, and only during the initial 45 day on the job training and examination period, the agent trainee may apply pesticides only in the physical presence of a commercial applicator or registered agent. Agent applicants failing to pass the exam are prohibited from performing pest control service work until such time the agent applicant passes the exam. If at any time an employee, other than a commercial applicator, registered agent, or agent trainee undergoing the initial 45 days of on the job training and examination preparation, is found handling pesticides or performing pesticide applications the license holder and/or the licensed operator/s will be subject to enforcement action as per the Arkansas State Plant Board Pest Control Enforcement Response Regulations – Penalty Matrix – Violation #9 – beginning at the 3rd level of enforcement. Training: Forty hours of verifiable on-the-job training, performed under the direct supervision, direction and control of a qualified trainer. A qualified trainer shall be a commercial applicator or agent with at least one year of experience in the pest control industry or other individual approved by the Plant Board. During the application of pesticides a qualified trainer must be physically present on the job site. On-the-job training must be documented by the license holder on an agent training verification form provided by the State Plant Board. The information shall include the names of the trainee and trainer, the dates of training, and the total hours worked for each date of the training. Examination and Registration: The Arkansas State Plant Board shall provide an agent examination and registration application form. The license holder shall complete the form and submit it to the Pest Control Section with a copy of the agent trainee's on-the-job training verification form and the examination fee. Examination and registration forms submitted without the on-the-job verification form and/or the examination fee will be considered incomplete and the trainee will not be eligible to take the examination. Complete agent exam and registration applications must be submitted to the Plant Board at least 5 working days prior to the examination. Upon passing the exam agents will be considered registered. Official agent registration identification cards will be provided to the license holder within 30 days of the exam date. Registered agents who cease to be employed by a license holder must receive the 40 hours of on-the-job training before being eligible for re-registration. Agents not registered for more than 24 months will lose eligibility for re-registration.</p>	1/12/2023 1:13 PM

Regulatory Impacts of Rodenticides as RUPs

and must complete the initial training and examination requirements to be re-registered. Registered agents under the minimum age of 18 are restricted from performing pesticide applications or being in sole possession of pesticides. License holders and commercial applicators found in violation of allowing employees of their pest control firm under the age of 18 perform pesticide applications or being in sole possession of pesticides will be subject to enforcement action as per the Arkansas State Plant Board Pest Control Enforcement Response Regulations – Penalty Matrix – Violation # 2 (C). Continuing Education: To maintain registration, agents shall be kept abreast of pest control technology and receive a minimum of 6 hours of continuing education each year. Continuing education may be achieved by completing a license holder’s in-house training program or attendance of, Plant Board approved, seminars sponsored by the various associations, manufactures or suppliers affiliated with the pest control industry or the cooperative extension service. Agent annual continuing education training shall consist of: Applicator safety (PPE, label instructions, human and/or non-target species exposure, safe storage and transportation of pesticides, etc.) – 2 hours Integrated Pest Management (IPM) – 1 hour Application equipment maintenance and methods of application – 1 hour Environmental concerns (container disposal, spill clean up, drift, etc.) – 1 hour Laws and Regulations – 1 hour License holders shall document in house training on forms provided by the Plant Board. Ongoing education provided to agents by attending approved seminars, training schools, etc. shall be documented with appropriate forms issued by the training’s sponsors to the attendees. Records of training must be kept, by the license holder, for as long as the agent is employed. Such records shall be available for review by the State Plant Board during normal business hours. At any time, should the Board determine that training requirements have not been met; the license holder may be subject to enforcement action as per the Arkansas State Plant Board Pest Control Enforcement Response Regulations – Penalty Matrix – Violation # 7.

4	Certified Applicators of Restricted Use Pesticides	1/12/2023 1:12 PM
5	§4-66-56 Certification of applicators. (a) No person shall apply restricted use pesticides unless certified in the category appropriate to the application or under the direct supervision of a certified applicator certified in the appropriate category. An applicator applying restricted use pesticides shall be certified as: (1) A commercial pesticide applicator; or (2) A private pesticide applicator.	1/12/2023 1:11 PM
6	We certify and license pesticide applicators with the general pest license category and/or structural pest license category. We do not license anyone termed a "technician".	8/17/2022 4:52 PM
7	(E) "Pesticide application technician" means any individual employed by a commercial applicator or governmental agency who, having met the competency requirements of section 16.1 of this act, is registered by the secretary to apply any pesticides under the direct supervision of a certified applicator. Under the direct supervision of—The term includes the following: (i) For a commercial or public certified applicator, the application of a pesticide by a registered pesticide application technician acting with the instructions and under the control of a certified applicator who is responsible for the actions of the technician and who is available when needed; or the application of a pesticide by a nonregistered or noncertified person acting with the instructions and under the continuous voice and visual control of a certified applicator who is responsible for the actions of the person and physically present at the application site.	8/17/2022 9:45 AM
8	2VAC5-685-65. Category for registered technician certification. An individual who successfully completes the requirements prescribed in 2VAC5-685-50 for registered technician certification will receive certification in Category 60, the category designation assigned to all registered technicians regardless of the category or subcategory in which he is trained and applies pesticides.	8/10/2022 10:19 AM
9	18 AAC 90.300(c) The department may certify an applicant for one or more categories of use listed in this subsection if the applicant meets the requirements of 18 AAC 90.305: (19) pesticide technician: individuals who apply general-use pesticides only under the direction of applicator certified in the appropriate category under (1) – (17) of this subsection; the certified applicator shall (A) make all decisions related to pest control; (B) be immediately available for consultation by telephone or other means if needed; and (C) before pesticide application, provide written instructions that identify (i) the complete pesticide product name; (ii) the EPA registration number of the pesticide; (iii) the date of application; (iv) the address of the application; (v) the method of application; (vi) the rate of application; (vii) the dilution of the pesticide; (viii) the estimated total amount of pesticide product to be applied; (ix) the target pests; (x) the site of the application; (xi) the name and current certification number of the	8/8/2022 4:38 PM

Regulatory Impacts of Rodenticides as RUPs

pesticide technician to apply the pesticide; and (xii) the name and current certification number of the pesticide applicator directing the pesticide application;

10	A registered employee is a non-certified employee such as a technician, salesperson, inspector or other employee involved with the solicitation or performance of any phase of structural pest control.	8/8/2022 1:41 PM
11	18 AAC 90.300. (19) pesticide technician: individuals who apply general-use pesticides only under the direction of applicator certified in the appropriate category under (1) – (17) of this subsection; the certified applicator shall (A) make all decisions related to pest control; (B) be immediately available for consultation by telephone or other means if needed; and (C) before pesticide application, provide written instructions that identify (i) the complete pesticide product name; (ii) the EPA registration number of the pesticide; (iii) the date of application; (iv) the address of the application; (v) the method of application; (vi) the rate of application; (vii) the dilution of the pesticide; (viii) the estimated total amount of pesticide product to be applied; (ix) the target pests; (x) the site of the application; (xi) the name and current certification number of the pesticide technician to apply the pesticide; and (xii) the name and current certification number of the pesticide applicator directing the pesticide application	8/8/2022 12:06 PM
12	"Pesticide technician", any individual working under the direct supervision of a commercial applicator certified in categories as specified by regulation, and who having met the competency requirements of this chapter, is authorized by the director to determine the need for the use of any pesticide as well as to the use of any pesticide;	8/8/2022 12:03 PM
13	Registered technician - an individual who is registered with the Department, under § 2311 of Title 20, and who works under the direct supervision of a licensed commercial or public applicator, as set forth in § 12(c) of the Pesticide Education and Control Amendment Act of 2012, effective October 23, 2012 (D.C. Law 19-191; 59 DCR 10166 (August 24, 2012)).	8/8/2022 10:59 AM
14	Employees who handle pesticides as a part of a commercial business.	8/8/2022 10:34 AM
15	RCW 17.21	8/5/2022 5:10 PM
16	NA	8/3/2022 3:04 PM
17	§ 106-65.24. Definitions (19a) "Registered technician" means any individual who is required to be registered with the Structural Pest Control and Pesticides Division under G.S. 106-65.31. § 106-65.31. Annual certified applicator card and license fee; registration of servicemen, salesmen, solicitors, and estimators; identification cards. (b1) Registration. - Within 75 days after the hiring of an employee who is either an estimator, salesman, serviceman, or solicitor, the licensee shall apply to the Division for the issuance of an identification card for such employee. The application must be accompanied by a fee of forty dollars (\$40.00) for each card. The card shall be issued in the name of the employee and shall bear the name of the employing licensee, the employer's license number and phases, the name and address of the employer's business, and such other information as the Committee may specify. The identification card shall be carried by the employee on his person at all times while performing any phase of structural pest control work. The card must be displayed upon demand by the Commissioner, the Committee, the Division, or any representative thereof, or the person for whom any phase of structural pest control work is being performed. A registered technician's identification card must be renewed annually on or before June 30 by payment of a renewal fee of forty dollars (\$40.00). If a card is lost or destroyed the licensee may secure a duplicate for a fee of five dollars (\$5.00).The licensee shall notify the Division of the termination or change in status of any registered technician. All identification cards expire when a license expires. Also, our N.C. Structural Pest Control Rules/Regulations have Registered Technician (RT) card/training requirements and supervision requirements of RT's who are still in training: 02 NCAC 34 .0313 REGISTERED TECHNICIAN'S IDENTIFICATION CARDS/TRAINING MATERIALS (a) A registered technician's identification card shall contain, but not be limited to, the following information: (1) name of registrant; (2) name of licensee or employer; (3) name of licensee's company; (4) address of licensee's company; (5) license number and phase(s) of licensee; (6) age, weight, height, color of hair and eyes of registrant; (7) job classification of card holder; (8) issuance date, expiration date, and license year covered by card. (b) The registered technician's identification card and the license of the employer of the card holder shall bear the same license number and license phase(s). Each registered technician's identification card shall bear only one license number, one company name, and not more than three license phases. (c) A licensee or noncommercial certified applicator applying for the issuance or renewal of a registered technician's identification card for his employee shall certify to the Division that the employee has completed employee training approved by the	8/3/2022 9:16 AM

Regulatory Impacts of Rodenticides as RUPs

Committee in structural pest control work. (d) All individuals who make application for the issuance, not renewal, of registered technician's identification cards after January 1, 1999, shall complete the following training, or its equivalent, before becoming eligible for the identification card: (1) Introductory Training: (A) Introductory training shall include completion of the workbook, Introductory Training for Registered Technicians; and (B) A minimum of 24 hours of on-the-job training in applicable phases of structural pest control by the licensee, certified applicator, or registered technician having at least two years of experience. (2) On-the-job training involving the methods and materials the employee will use in the day-to-day performance of his duties. (3) The North Carolina Structural Pest Control Registered Technician School. A fee of twenty-five dollars (\$25.00) shall be charged for each employee attending the Registered Technician School. (e) Training materials and records shall be made available for inspection during regular business hours upon request by the Division and shall be retained two years beyond the last date of the individual's employment. (f) Introductory training shall be completed before the employee is permitted to mix or apply pesticides without the on-site supervision of a registered technician, certified applicator, or licensee.

18	Sec. 1951.351. TECHNICIAN TRAINING PROGRAM. (a) The department shall: (1) develop or approve a training program for licensed technicians and for applicants to become licensed technicians; and (2) require that an applicant for a technician license complete the training program. (b) The department shall develop the educational and training materials for the training program with the Texas Agricultural Extension Service or any other institution of higher education. The department shall publish and distribute, in conjunction with the Texas Agricultural Extension Service, the materials developed as a part of the training program. (c) The training program must include instruction in: (1) recognition of pests and pest damage; (2) pesticide labels and label comprehension; (3) pesticide safety; (4) environmental protection; (5) procedures for the immediate reporting of spills and misapplications; (6) application equipment and techniques; (7) pesticide formulations and actions; (8) emergency procedures and pesticide cleanup; (9) state and federal law relating to structural pest control; (10) basic principles of mathematics, chemistry, toxicology, and entomology; (11) nonchemical pest control techniques, including biological, mechanical, and prevention techniques; and (12) any other topic the department considers necessary. (d) The department may create a technician training program advisory committee to assist the department in developing the training program required by this section. (e) The department may approve a training program that has not been developed by the department if the program meets the standards adopted by the department for the program. Completion of a training program approved by the department under this subsection satisfies Subsection (a)(2).	8/2/2022 6:02 PM
19	Commercial applicators must be certified/licensed. There is no working under someone else's license.	8/2/2022 2:21 PM
20	Qualifications: A service technician shall be certified upon successful completion of a written service technicians examination. Definition: "Service technician" means a person employed by a licensed commercial or noncommercial applicator who applies the pesticide or employs a device, but is not a certified applicator. A service technician or certified applicator shall be present at each application performed	8/2/2022 12:58 PM
21	"Commercial applicator" means an individual who is licensed under section 921.06 of the Revised Code to apply pesticides or to conduct authorized diagnostic inspections. "Trained serviceperson" means an employee of a pesticide business, other business, agency of the United States government, state agency, or political subdivision who has been trained to apply pesticides while under the direct supervision of a commercial applicator.	8/2/2022 8:24 AM
22	"Licensed applicator", an individual who is licensed under the provisions of section ten as authorized to be present while pesticides classified by the department as being for restricted use are being applied under the direct supervision of a certified applicator, or to use or to be present to supervise the use or land of another for hire any pesticide classified by the department as being for general use.	8/2/2022 8:23 AM
23	"Registered Technician" shall mean a bona fide employee of a license holder who has completed the verifiable training as described in subsection 114.02 of this chapter and who has obtained a registered technician identification card from the Bureau.	8/1/2022 6:07 PM
24	All pest control personnel performing structural pest control activities must carry (not display) on their person an official identification card which demonstrates verifiable training in the area of pest control in which they operate and provides the business and appropriate commercial license number, technician's name, or other pertinent information, as designated by the department. This identification must be presented upon request, and failure to do so shall	8/1/2022 5:02 PM

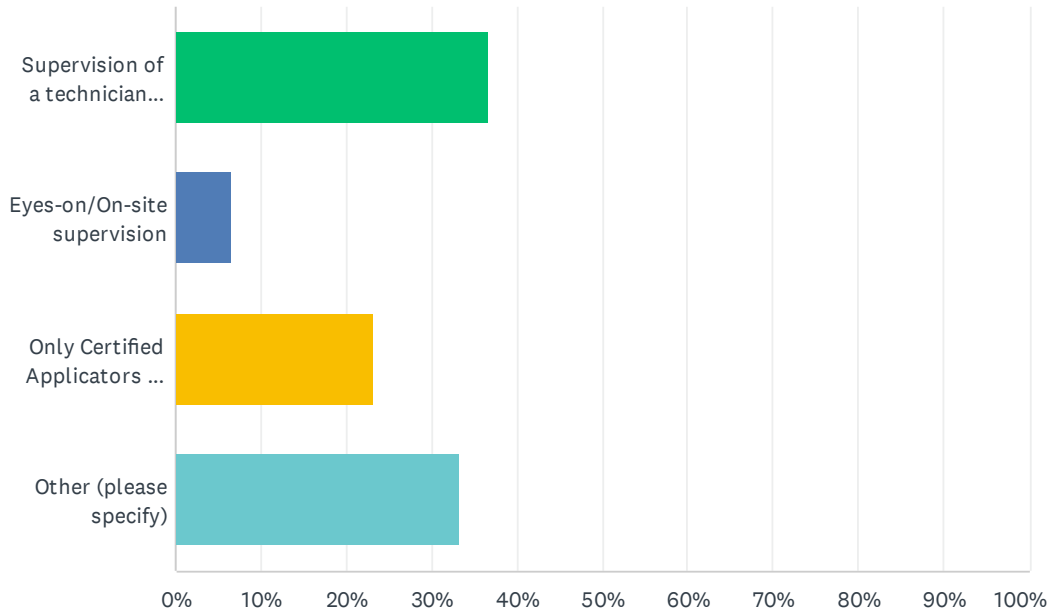
Regulatory Impacts of Rodenticides as RUPs

constitute a violation of this Section. The card shall remain the property of the Department and must be surrendered when the cardholder employment ceases. Office personnel who do not conduct inspections or apply pesticides are not subject to this provision

25	"Agent" means any person registered with the board, by a licensed operator, to solicit or sell pest control service, which the operator is licensed to perform. Including the signing of contracts, making inspections for the purpose of servicing or continuing contracts, and supervising workers and working crews in carrying out pest control service, when so designated by the licensed operator, or except as may be limited by the State Plant Board in its rules and regulations made under authority of this chapter. This is not to be construed as relieving the licensed operator in any way of being responsible for personal and direct supervision of all work performed under his license;	8/1/2022 4:10 PM
----	---	------------------

Q6 Please list the conditions under which your state allows registered/trained technicians to apply restricted use pesticides (RUPs).

Answered: 30 Skipped: 1



ANSWER CHOICES	RESPONSES
Supervision of a technician (i.e., phone supervision)	36.67% 11
Eyes-on/On-site supervision	6.67% 2
Only Certified Applicators may apply RUPs	23.33% 7
Other (please specify)	33.33% 10
TOTAL	30

#	OTHER (PLEASE SPECIFY)	DATE
1	By the certified applicator or under the direct supervision of a certified applicator certified in the appropriate category.	1/12/2023 1:11 PM
2	Depends on State or federal RUP	8/17/2022 4:03 PM
3	Certified RTs only need direct supervision (on-site not required per RT definition unless label requires presence of CA; Regs define "under the direct supervision" vs "under the direct on-site supervision")	8/10/2022 10:19 AM
4	Our regulations prohibit a technician from application of any RUP.	8/8/2022 12:06 PM
5	It depends which statute the application is occurring, if it is structural then supervision of a technician is fine. If it is agricultural on site supervision is required. Only certain pesticides require only certified applicators to apply RUP's.	8/8/2022 11:26 AM
6	2312.3 Direct supervision shall include, but is not necessarily limited to, the requirements set forth in §§ 2312.4 and 2312.5. 2312.4 If the label of the pesticide being applied so stipulates, direct supervision shall be defined as the physical presence of a supervising licensed certified applicator. 2312.5 Unless the pesticide label indicates otherwise, in the absence of the	8/8/2022 10:59 AM

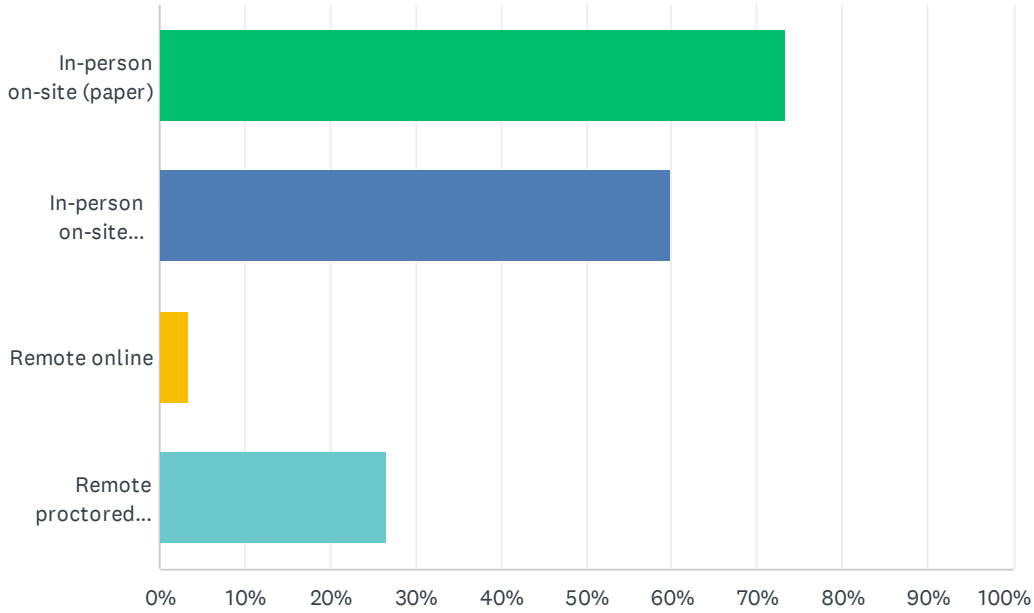
Regulatory Impacts of Rodenticides as RUPs

supervising licensed certified applicator, direct supervision may be provided by clearly legible written or electronic verifiable instructions or directions at a location at which pesticides are handled, mixed, stored, disposed, applied, or used. The instructions shall specify the following information: (a) How to handle and apply the pesticide; (b) The precautions to be taken to prevent injury to the applicator, other persons, and the environment; and (c) How to contact the supervising licensed certified applicator under whose supervision the registered technician is working. The technician shall have direct voice contact with the supervising licensed certified applicator if needed.

7	Under the supervision of the Certified Operator. (Direct or indirect)	8/3/2022 3:04 PM
8	106-65.24. Definitions. As used in this Article: (24) "Under the direct supervision of a certified applicator" means, unless otherwise prescribed by its labeling, a pesticide shall be considered to be applied under the direct supervision of a certified applicator if it is applied by a competent person acting under the instructions and control of a certified applicator who is available if and when needed, even though such certified applicator is not physically present at the time and place the pesticide is applied. Also, the N.C. Rules/Regulations define Supervision as: 02 NCAC 34 .0102 DEFINITIONS 51) "Supervision," as used in 02 NCAC 34 .0325, shall mean the oversight by the licensee of the structural pest control activities performed under that license. Such oversight may be in person by the licensee or through instructions, verbal, written or otherwise, to persons performing such activities. Instructions may be disseminated to such persons either in person or through persons employed by the licensee for that purpose. 02 NCAC 34 .0325 DUTY OF LICENSE HOLDER TO CONTROL ACTIVITIES (a) The licensee shall be actively and personally engaged in the supervision of the structural pest control activities of any office to which his/her license is assigned. (b) If any office or individual employee of a license holder is not within 75 miles of the licensee's residence, by the nearest public road, the licensee shall submit to the Committee, in writing, information to show that he/she is, in fact, controlling, directing, and supervising the structural pest control activities of said office or employee. (c) In the event information submitted to the Committee by a license holder is insufficient for the Committee to determine that said holder is, in fact, controlling, directing, and supervising the structural pest control activities of his office or employees, the Committee shall require said holder to appear before it and set forth, in detail, information to show that he/she is, in fact, in charge of the structural pest control activities of his office or employees. (d) The information required in Paragraph (b) of this Rule shall be submitted within 10 days of employment of any individual to which Paragraph (b) of this Rule applies and at the time the license or identification card is issued, reissued, or renewed. (e) It shall be a violation of the rules of the Committee for any license holder to fail to adequately control, direct, and supervise the structural pest control activities of his/her office or employees.	8/3/2022 9:16 AM
9	We have a mix. Registered Apprentices who have not completed training must have eyes-on/on-site supervision. Fully trained apprentices and licensed technicians may apply under direct supervision.	8/2/2022 6:02 PM
10	When our C&T plan is approved by EPA, only certified applicators may apply RUPs. Until then, registered/trained technicians can make applications under the direct supervision of a certified applicator. Unless otherwise prescribed by its labeling, a pesticide that is to be applied by a competent person acting under the instructions and control of a certified applicator who is available if and when needed, even though that certified applicator is not physically present at the time and place the pesticide is applied.	8/1/2022 6:07 PM

Q7 What type of certification testing does your state offer (check all that apply)?

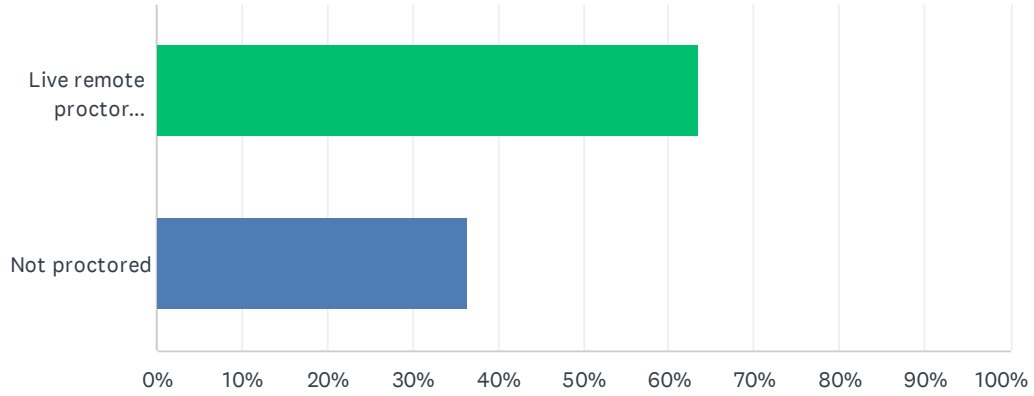
Answered: 30 Skipped: 1



ANSWER CHOICES	RESPONSES	
In-person on-site (paper)	73.33%	22
In-person on-site (computer)	60.00%	18
Remote online	3.33%	1
Remote proctored online (computer & monitored)	26.67%	8
Total Respondents: 30		

Q8 If your state has remote proctored online capabilities, is this with or without a live remote proctor?

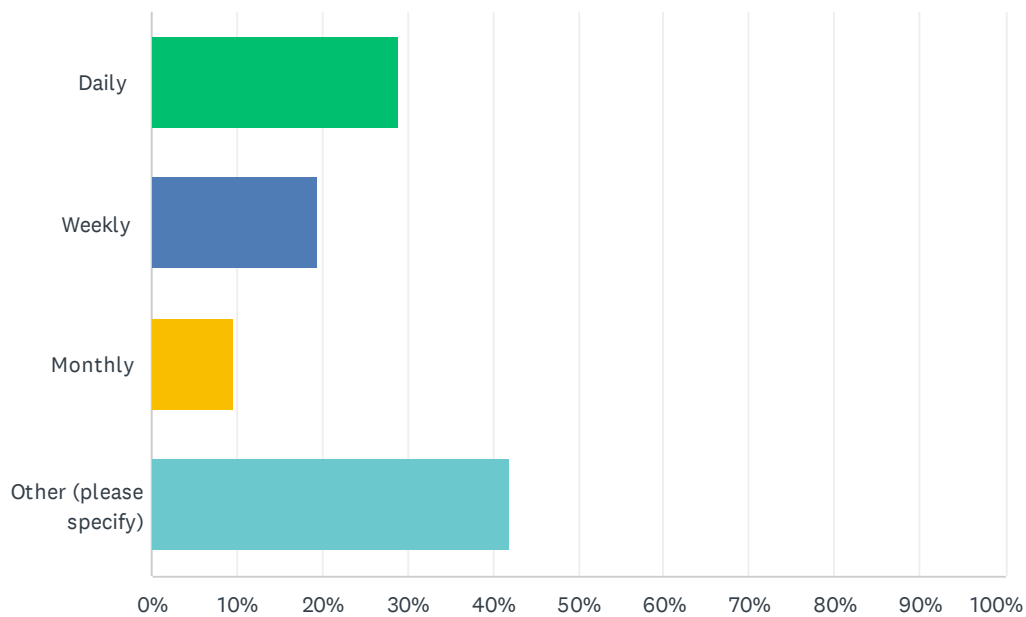
Answered: 11 Skipped: 20



ANSWER CHOICES	RESPONSES	
Live remote proctor (individual monitoring in real time)	63.64%	7
Not proctored	36.36%	4
TOTAL		11

Q9 How frequently are in-person certification exams offered in your state?

Answered: 31 Skipped: 0



ANSWER CHOICES	RESPONSES
Daily	29.03% 9
Weekly	19.35% 6
Monthly	9.68% 3
Other (please specify)	41.94% 13
TOTAL	31

#	OTHER (PLEASE SPECIFY)	DATE
1	They are offered throughout the year at several locations and can be requested anytime at BPI.	1/18/2023 3:47 PM
2	2x weekly in Las Vegas office, Daily by request in Sparks and Elko offices.	1/12/2023 2:00 PM
3	As needed and when requested.	8/10/2022 10:19 AM
4	It depends on the county and the statute.	8/8/2022 11:26 AM
5	Every other month (bimonthly)	8/8/2022 10:59 AM
6	Every 45 days or if requested individuals can come to the office to take exam.	8/8/2022 10:34 AM
7	Several locations offer monthly testing and one offers weekly testing.	8/5/2022 5:10 PM
8	Testing available upon appointment or during an onsite training held by University of Wyoming Extension	8/4/2022 11:00 AM
9	We offer approximately 36 in person, Certification exam sessions per year or approximately 3 per month.	8/3/2022 9:16 AM
10	n/a	8/2/2022 8:23 AM

Regulatory Impacts of Rodenticides as RUPs

11	In-person exams are offered quarterly but arrangements can be made for in-person testing at our office. Applicants can also schedule exams at testing centers in the state that partner with other third party vendors.	8/1/2022 6:07 PM
12	In person exams offered only by request. Routinely offered to university and technical colleges as part of course work.	8/1/2022 5:02 PM
13	Monthly for Licensed Operators and weekly for Agents (technicians)	8/1/2022 4:10 PM