

White Paper - Developing a Template for Certification Plans

The Certification & Training Assessment Group (CTAG) is a partnership effort involving EPA, USDA, pesticide State Lead Agencies (SLA's), Cooperative Extension Service and others interested in providing direction to the future of the national pesticide safety education and certification program. CTAG goals include encouraging the annual review of state certification plans, facilitating reciprocity agreements among states, tribes and territories, developing evaluation tools and promoting accomplishments of the program. One approach to accomplishing these goals is to develop a single template combining certification plan requirements and annual program reporting to EPA.

Background

According to FIFRA and the Code of Federal Regulations (CFR), the SLA's are obligated to keep certification plans current and to provide annual program reports to EPA.

Per FIFRA Section 11, a state, tribe or territory shall have an EPA-approved plan in order to be able to certify applicators of restricted use pesticides. 40 CFR 171.7 outlines the required contents of a certification plan. States, tribes and territories are given flexibility in adding categories/subcategories of certification and their accompanying standards and developing options for pesticide applicator recertification. 40 CFR 171.8 specifies that certification plans shall be updated regularly so that they reflect the current program and assure that applicators meet a continuing level of competency. Currently, the certification plans of the designated SLA's lack uniformity in presentation. Also, few are in electronic format or up-to-date.

The SLA's are obligated to report information to EPA. Per 40 CFR 171.7, the SLA shall report information annually to EPA on numbers of applicators certified, changes in subcategories, proposed changes in plans and a summary of related enforcement activities. EPA uses the information (that is, number of applicators certified) to determine funding allocations. However, an annual review of the certification plans along with a reporting of changes, and enforcement activities related to the program are not always carried out.

Additionally, per 40 CFR 171.7, EPA may request other reports for specific needs. This is often the case when a chemical is going through the reregistration process and may be designated as restricted use. During this process, it is helpful to have information regarding certification categories/subcategories, certification/recertification options, and recertification time periods. Such information helps EPA and the SLA's in preparing for certification of new pesticide applicators as a result of the changed status of a chemical.

Recommendations

A CTAG workgroup is in the process of developing an electronic or web-based template which would allow the SLA's to enter information per the certification plan outline in 40 CFR 171.7, to identify additional elements unique to the state, tribe or territory, and to satisfy reporting requirements, all on the same form.

Benefits

An electronic or web-based form would directly benefit the SLA's by allowing easy updating of, access to, and comparison of certification plans, as well as simplification of reporting. Additionally, a consistent format for all certification plans would assist with state, tribe or territory determination of reciprocity agreements and would permit quicker review and approval of such plans by EPA. Finally, the new certification template would facilitate information gathering by EPA, especially during the reregistration process.