

Certification Standards: A National Overview

Wide certification variation among the states means a crazy-quilt of regulations for the industry

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Most pest control operators are keenly aware of the extensive state and federal regulation of their industry. However, few are aware of how these regulations vary from state to state.

This variation should be of interest not only to PCOs interested in promoting uniformly high standards within the industry, but also to educators, regulatory officials and industry representatives involved in the creation and implementation of training programs.

The lessons learned in one state may aid other states engaged in revising or updating their regulations. Researchers examining trends and practices within the pest control industry should also be aware of the different regulatory structures found in different areas.

Decade's first survey

No surveys of state pest control policies have been published since 1974, and the regulatory picture has changed substantially in the last 10 years.

To obtain current information, we recently sent an inquiry to officials in each state, all of whom are members of the National

Association of Structural Pest Control Regulatory Officials. The 50 responses demonstrated the lack of national uniformity in meeting common goals of pest control regulation.

The "common goals" of the states arise from EPA regulation 40 CFR 171, which requires written examination of aspiring

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PCOs before they can be certified to apply pesticides commercially. The EPA itself can conduct these examinations on federal property and in states without certification programs meeting the minimum EPA standards.

Currently, every state except Colorado and Nebraska administers its own certification program. Colorado recently enacted appropriate legislation and efforts are underway in

Nebraska, but the EPA will continue to certify commercial applicators in these two states in 1985.

Varying structures

Differences in the organization of the various state governments lead to differences in the structure of governmental agencies charged with regulating PCOs. The specific regulatory agency is most frequently a board, bureau or division of the State Department of Agriculture in 37 of 50 states.

In two states, Arizona and Texas, the Structural Pest Control Board is a separate and independent agency; while in the remaining 11 states, PCO regulation is associated with departments concerned with consumer affairs, conservation, health, or environmental protection.

This can have important consequences for enforcement priorities and research funding by the state agencies, since structural pest control may be only one part of the overall responsibilities of the "umbrella" department.

For example, a state department of agriculture is likely to have been chartered with

TABLE 1

State Requirements for Certification and Licensing of Structural Pest Control Operators

State	Experience required for certification/licensing ¹	Update training required for recertification ²
Alabama	1 year	2 programs/3 yrs
Alaska	0	re-examination/3 yrs.
Arizona	2	None
Arkansas	1	1 program/3 yrs ³
California	4	30 hrs./3 yrs.
Colorado ⁴	2	1 program/3 yrs.
Connecticut	0	1 program/5 yrs.
Delaware	0	8 hrs./3 yrs.
Florida	3	4 hrs./1 yr.
Georgia	2	10 hrs./5 yrs.
Hawaii	4	None
Idaho	0	None
Indiana	0	18 hrs./5 yrs.
Illinois	1	1 program/3 yrs.
Iowa	0	1 program/3 yrs.
Kansas	0	1 program (2-5 days)/3 yrs.
Kentucky	2	2 courses/5 yrs. ⁵
Louisiana	4	1 program (6 hrs.)/3 yrs.
Maine	2	15 hrs./5 yrs.
Maryland	1	1 program/1 yr.
Massachusetts	0	6 hrs./5 yrs.
Michigan	0	1 program/3 yrs.
Minnesota	0	1 program/1 yr.
Mississippi	4	1 program/3 yrs.
Missouri	1	1 program/3 yrs.
Montana	0	12 hrs./4 yrs.
Nebraska ⁶	0	1 program/3 yrs.
Nevada	2	None
New Hampshire	5	1 program/5 yrs.
New Jersey	0	12 hrs./5 yrs.
New Mexico	2	8 hrs./5 yrs ⁷
New York	3	20 hrs./5 yrs.
North Carolina	2	5 hrs./5 yrs.
North Dakota	0	1 program/3 yrs.
Ohio	0	5 hrs./3 yrs.
Oklahoma	2	None
Oregon	0	40 hrs./5 yrs.
Pennsylvania	0	1 program/3 yrs.
Rhode Island	0	1 program/5 yrs.
South Carolina	0	None
South Dakota	0	1 program/2 yrs.
Tennessee	2	1 program/4 yrs.
Texas	1	None
Utah	0	None
Vermont	0	1 program/5 yrs.
Virginia	0	2 hrs./3 yrs.
Washington	0	None
West Virginia	0	6 hrs./3 yrs.
Wisconsin	0	1 program/5 yrs.
Wyoming	0	24 hrs./3 yrs.

¹Maximum amount of experience required for any one category of certification/licensing. Some categories may require less experience; education and supervisory experience may be given weight to reduce requirement.

²Minimum amount required for any one category. Every state requiring update training also offers the alternative of re-examination.

³"Program" refers to a training course, workshop or seminar from 1-5 days in length.

⁴1984 legislation. Currently, certification administered by USEPA (no experience required; one training program/3 yrs. required for recertification).

⁵Purdue or University of Kentucky Short Course.

⁶Currently administered by USEPA in lieu of an approved State plan.

⁷4 hrs./1 yr. for recertification in termite control category.

different priorities than a department of consumer affairs or a department of health services. It is also common for personnel to periodically rotate among the different agencies contained within a single governmental department, which reinforces the impact of the overall departmental charter on agency practices.

Broad knowledge

The minimum EPA examination standards for certification of commercial pesticide applicators require a broad knowledge of pests, label comprehension, pesticide safety, pest control chemicals, equipment and application techniques, environmental protection and applicable state and Federal regulations. State examination standards frequently exceed these minimum EPA requirements.

In California, for example, knowledge of business law is required, and termite control operators are tested on construction practices and safety.

The EPA suggests 10 general categories of commercial pesticide applicators:

- 1 Agricultural pest control.
- 2 Forest pest control.
- 3 Ornamental and turf pest control.
- 4 Seed treatment.
- 5 Aquatic pest control.
- 6 Right-of-way pest control.
- 7 Industrial, institutional, structural and health related pest control.
- 8 Public health pest control.
- 9 Regulatory pest control.
- 10 Demonstration and research pest control.

Individual states may further subdivide or delete categories as needed. Most PCO activities belong in category seven, which is most frequently divided into three subcategories for certification purposes:

- 1 Wood-destroying pests and organisms.
- 2 Household pests other than those attacking wood.
- 3 Fumigation.

Food processing

Further subdivision of this category is not unusual, however.

For example, pest control in food processing establishments is considered a separate subcategory in at least Maine, New Jersey, New York and Vermont. In every state, at least one written examination must be completed to be certified in a particular category or subcategory of pest control.

A number of states including Maine, New Jersey, New York, Pennsylvania and Vermont require completion of an additional general "core" examination as well as one tailored to the specific category in which certification is desired. Twenty-three of the 50 states require experience in pest control as a prerequisite to application for certification (Table 1).

Experience variations

The amount of experience required frequently depends on the particular category of pest control, and on the educational background of the applicant. All states requiring experience are prepared to accept college-level coursework in entomology or other subjects related to pest control as partial fulfillment of the experience requirement.

Three states, California, New Mexico and Rhode Island, also require applicants to complete certain state-approved training courses regardless of their experience or educational background. New Mexico requires eight hours of training in termite control and Rhode Island requires attendance at a day and a half-day training session on general pest control practices and an additional one day session on each particular category of pest control.

California currently has the strictest application procedures, requiring completion of courses in pesticides, pest identification and biology, contract law, state rules and regulations, business practices, fumigation safety for certification in fumigation and construction repair for certification in control of wood-destroying pests.

In California, appropriate courses are offered by the University of California, by pest

control companies and by some private firms specializing in the production of educational seminars.

In addition to defining the minimum standards of competency for the initial certification of PCOs, the EPA states that individual state certification plans should include "provisions to ensure that certified applicators continue to meet the requirements of changing technology and to assure a continuing level of competency and ability to use pesticides safely and properly."

Renewing certification

To renew certification at the federal level, which is required every three years, the EPA requires commercial applicators to either complete another written examination or an EPA-approved training program.

A total of 40 states appear to have followed the EPA lead in requiring continuing education, update training, as an alternative to re-examination.

Only Alaska allows for re-examination, although supplemental training workshops are organized, while the nine remaining states currently renew certifications simply upon payment of the appropriate fee.

However, the amount of training required in states with continuing education programs varies greatly from state to state (Table 1). North Carolina, for example, requires five hours of training during the five-year certification period, as opposed to the 20 hours required by New York. Since this constitutes a suggestion by the EPA rather than a requirement, other alternatives are also possible.

Of the states currently requiring some evidence of continued competency for recertification, Tennessee has perhaps the most liberal alternative, PCOs are permitted the option of filing an affidavit stating that they have received and are familiar with the informational material issued by the Tennessee Department of Agriculture.

Consequences

What are the consequences and implications of state-to-state variation in pest control regulations? Certainly, PCOs in different areas do have to deal with different situations and pest problems and thus make use of somewhat different skills.

However, just as with doctors and lawyers in different states, one would hope for an overall similar level of competency, independent of the particular geographic location of each PCO's practice. Despite the EPA guidelines, the current mosaic of state pest control regulations makes it difficult to define that overall level of competency.

Apparently, few state governments have looked outside their own borders while putting together their regulations. Yet, every state regulatory agency has faced the problem of determining the competency of applicants for PCO certification who are new to their state but have previously been employed in pest control in other states.

State governments walk a tightrope with regulatory legislation. Regulations that are too strict are difficult and expensive to enforce. They increase the costs of the purveyor and thus the cost to the consumer of the regulated service.

On the other hand, regulations that are too flexible lead to inconsistencies in the quality of the regulated service and subvert the intent of federal guidelines. It can only benefit the national image of the pest control industry to encourage more uniform standards. **PC**

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