

*Notes from C&T Assessment Group Break-out Sessions  
National PAT & Certification Workshop  
Portland, Maine  
August 10, 1999*

\*Note: the following are comments made during the CTAG break-out sessions at the workshop. Duplicate comments/ideas were eliminated and comments with a common subject were grouped together, as much as possible. Otherwise, the comments themselves were not altered. Every attempt will be made to use these comments in discussions with additional stakeholders on CTAG proposals.

**Goal 1: Reduce the risks to the public from pesticide use.**

**1. Develop a homeowner/consumer national information program**

**A) Ideas for Projects, Use of Media, Resources**

1. Have videos playing in stores (1 on turf/orn., 1 on vegetables)
2. "How to" programs in garden/homeowner stores
3. Fact sheets - go on web in PDF format (N.Y.) --- PPE for consumers, health effects, emergency response, water treatment options, household chemicals
4. EPA needs to go back to foundation - safe use protect public health- use t.v. as means to reach public
5. Home pesticide safety education training - want if free (WI.)
6. Offer to owners of stores
7. Booths/information at national conventions
8. Add to materials that go to homes from local gov't. (recycling, leaves, etc.)  
- or with water bill
1. Need to identify media (newspaper/radio) - primary & secondary
2. APHIS involved in Rodenticide Task Force - point of sale dealer (800# to get info.)
3. Displays in highly used public areas (Cincinnati zoo - permanent IPM exhibit), state fair grounds, botanical gardens
4. Lawn/turf/ornamental have to be certified - complain that homeowners misuse and applicator blamed (p.a.)
5. Newspaper, county fairs, t.v./radio PSAs - tell them to call for more info.
6. Garden shop/centers, Retail outlets
7. Garden clubs
8. Need to access data/information to find out who/how audience; if have access to computers, etc.
9. Tools in Schools - Region 6 - need to educate youngsters for true behavioral change
10. Work with stores (Home Depot...) and educate them - use Train the Trainer
11. Garden shows/horticulture - info booth & market surveys of audience
12. Home pest project - brochures for garden centers & hardware stores (point of sale) (WI., VA.) - checklist, sources of contacts
13. Poison control centers (HI.)
14. Master Gardener slide set
15. EFNEP
16. Requests via e-mail, phone, build on web site - pest mgmt. recommendations and Qs & As
1. Need national org. web site linking all of this information together
2. PSAs during certain times of year (N.D.)
3. Nurserymen assoc.
4. Provide information to Extension to deliver

5. Nursery inspectors putting information in stores (OR.)
6. Build on other existing programs (Master Gardener, weekly NE. radio programs)

## **B) Other Comments**

1. Questions on disposal - states need \$ to set up disposal program
2. Don't need to reinvent - need to pool resources
3. Greatest need identified at local government level — educate county boards, Dept. of health, education, and do on Regional basis — prepare materials for decision-makers
4. Funding/resources problem
5. Store manager doesn't go for invitations - need to get in door (also like use inspector trial)
6. Needs to be mandatory - not voluntary
7. Retailer violation - settlement included ed. (Chicago)
8. EPA grant - PESP - train dealers how to explain IPM to homeowners (VT. 2 year program) - interest from dealers to get information
9. Identify most at risk homeowner/consumer user group (N.C.)
10. Need Industry participation (Canada)
11. Keep outdoor/indoor programs separate
12. Needs to be succinct message
13. How do we get to those in the public that don't care? What can we do to help them? Who is responsible? Work with chemical companies
14. Example: Rodenticide Task Force: need enhanced program for consumer education - involves industry on group to develop program

## **1.2 Expand program training and/or certification for all users/uses of occupational pesticides**

### **A) Certification/License**

1. License dealers would bring retailers in (not just RUPs) — keep vets exempt
2. Need to force license/education
3. Could involve licensing, maybe not certification (state by state)
4. Verifiable training needed to get them there & to document compliance
5. Need to certify that they learn the content we think is important
6. Can have certification without license (example: Minnesota)
7. Think of training/certification as a progression - provide education, info, plans; reserve certification as a step down the road
8. Should be training - not necessarily certification (example: registered technicians)

### **B) Training/Other Comments**

1. Losing applicators - less need for RUPs (ag. - growers) — will no longer know about groundwater, WPS, recordkeeping, etc.
2. If going to "SAFER" products - losing RUPs, doesn't consider "crop health"
3. Could be short training sessions (WPS worker training)
4. Tracking of training - how?
5. Homeowners use chemicals & don't have to be certified - could certify for purchase, -difficult part - determine info needed/basic info
6. Consumers have perception - no risk if I can buy it
7. Link with funding (for Extension and Certification) - could double # of applicators
8. According to FIFRA - difference between them - private/commercial
9. Illiterate farmers - need training, not certification (HI.)
10. Consider language/literacy barriers in this proposal
11. Recordkeeping - random sampling - Corporate issue - caution certification letting employer off of the hook - farmers certified and keeping records but hiring applicators -handler category - carrying certification - not buying/access to PPE
12. Pesticide law - make it illegal to induce someone to do something illegal (N.C. law) - in Canada

- the business is always responsible
- 13. WPS - training/PPE
- 14. Applicators want more targeted/specialized training
- 15. Incidents are mostly with general use products (N.D.)
- 16. Remove “under supervision” because of budgets, confusion to trainers/applicators
- 17. Need to add definition to “training” (doesn’t necessarily mean face-to-face)
- 18. Challenge - school maintenance, etc.

(Note: 1.3 “Integrate the WPS training requirements with the new applicator training program” was merged into 1.2)

#### **1.4 Pursue more aggressive use of current RUP classification system**

##### **A) Comments on Prescription Use**

- 1. Who certifies prescriber? Who carries liability?
- 2. Prescription should be state-by-state
- 3. Prescription use - would have to be quick, reactive, available every day
- 4. CA. - public health and comm. recommended by advisor — monitoring info. goes into decision
- 5. LA. - consultant has to get okay from Dept. of Ag.
- 6. Hesitant - who writes prescription? Need process
- 7. LA. - county agent determines if infestation is great enough for need and all in area can use prescription
- 8. Prescription use - example Livestock Protection Collar
- 9. If we don’t catch this early, it’ll develop chemical by chemical
- 10. Section 4 open paragraph to allow for prescription use - needs to be carefully managed and thought out - not apply for everything
- 11. Prescription use - like Section 18s, is a tool that could be made into a process (make recommendation - write - give to others to apply) - handled in states for the rest of time
- 12. Limited use pesticides (ME.) - interactive with Board/public - show where to be used, problem, pest, economic threshold

##### **B) Comments on Restricted Use**

- 1. Needs to be standardization of products and classification — lots of loopholes
- 2. Need to strengthen definition of “RUP”
- 3. Restrict — concentrated vs. diluted
- 4. Need more resources to train people if expanding RUPs/prescription use
- 5. Doesn’t mean anything to applicators if RUP or not - has not separated anything (already certified)
- 6. Tier within RUPs (according to groundwater concerns, etc.) - require additional training, etc. to use
- 7. Limitation on concentration/a.i. - training and use

##### **C) Other Comments**

- 1. Label for general use but says for commercial use only (so homeowner cannot buy it)
- 2. How much can SLA do?
- 3. (Changes) Would cause confusion with applicators
- 4. Why isn’t “for commercial use only” enforceable? - need mechanism
- 5. Need Consumer use category
- 6. Need refinement of label statements
- 7. Need to tighten up the way they are sold (those who give advice on products need some training)
- 8. Look at quantity of purchase - require training accordingly

**Goal 2: Provide high quality pesticide education and safety training programs.**

## 2.1 Update national core curriculum.

### A) Suggested Topics

1. Water quality; Drift; Expand drift management; Public sensitivity training; Public relations; Ethics/professionalism/attitude - critical decision-making; Conflict resolution; Expand drift management; IPM - minimum use; Ethics/attitude; Consider local conditions/needs; Calibration basics, Recordkeeping; Some material basic - e.g. safety & toxicity; IPM principles and minimum use; Detailed IPM information - incorporate research results; WPS/FQPA/Genetic materials - ongoing revisions needed; Environmental impacts of use; RUP labeling content; Engineering expertise e.g. EXTTOXNET group, chemigation

### B) Other Comments

1. Fund entire core curriculum
2. Expand on existing manual as baseline
3. State rules adapted from national
4. Distinguish certification vs. recertification (more flexible)
5. Private vs. commercial core material
6. How about foreign languages (Environmental Justice issues)
7. States adapt and supplement national core
8. Solicit content - continually update - need person, process & scheduled routine
9. Canada 5 - year updates
10. Establish a core manual coalition
11. Need coordinated effort for materials development/review
12. Link with subject matter expertise
13. Use Drift coalition model
14. Time concerns with large groups - develop drafts first for experts to expand
15. Make core visible and accessible
16. Plug and play system - adapt to state needs - modules
17. Need meaningful manual — why? Different audiences, specialized categories
18. Determine what everyone needs to know — who needs to know everything about core material?
19. Where does core material fit in specialized categories? — ground water, endangered species, surface water
20. Look at future needs — 3 to 5 years to revise core
21. Won't apply to every category - states need to adapt curriculum
22. States don't have validation capability for every category
23. There's a need for a coordinated effort – groups okay, but concerned about time required for input consensus
24. AAPSE subgroup for review — include industry
25. How about development? Include all documents e.g. EPA IPM document
26. Identify needs for each category
27. What does quality training mean?
28. ADAC - national system for electronic modules/internet facilitation (WSU, ASU)
29. Avoid duplication of effort
30. Competitive grants that require coordination for materials/manuals
31. Website access for comments
32. Need to identify skills and incorporate job analysis
33. Also include competencies needed for safe application
34. Skills vs. knowledge needed
35. Look for certain things in testing structure vs. learning objectives in education
36. Testing bar needs to be high
37. Allow flexibility to adapt program for state needs not a single prescribed approach like WPS
38. Consider local conditions/needs
39. Criteria for educational agenda for: training providers, speaker qualifications, course content
40. Consider specialty areas - what applies?
41. Coordination - Extension Service mandate for coordination; always steal from each other; provide

- credit
- 42. Exam validation promotes coordination for material development and review
- 43. Access to photographs and graphics
- 44. MN - VA - WA - AZ Agr.-Distance coordination of grant to put system in place for electronic training delivery - modules and study material
- 45. Generic core - avoid regional biases
- 46. Determine audience
- 47. Keep flexible to adapt to state needs
- 48. Needed skills

## **2.2 Coordinate development and review of materials.**

1. FR Notice - send in material for review by “blue ribbon” panel (e.g. health care providers strategy)
2. Materials with broad application or new material
3. Coordination/review process grant requirement
4. Consistent standard - “creative titling” to fit requirements
5. Peer review from external sources during development
6. Promote regional coordination - funding condition; may reduce lag time with coordinated effort
7. Good idea
8. Resolve intellectual/property rights

## **2.3 Establish Pesticide Regional Education Centers to update skills/knowledge of educators, regulators and interested parties.**

### **A) Ideas for Courses**

1. Teaching methodologies; Public Relations, toxicology, specialty categories, civil lawsuits/liability; Communication; Different or creative techniques; Non-traditional/non-ag. aspects — urban, IPM in schools, specialized categories

### **B) Potential Audiences**

1. Coordinators/county agents, state inspectors/staff, industry; new agents, coordinators, state personnel (inspectors), ag. gov’t (NRCS), manufacturers representatives, crop consultants, dealers, health care workers

### **C) Other Comments**

1. Professional applicators institute - traveling program
2. Determine existing capacity
3. Internet modules - multiple universities
4. Bring groups into flexible facility
5. Consider distance education
6. Train-the-trainer centers: 1 - 2 week courses
7. Focus for testing & evaluation programs
8. Certified trainers required for program approval
9. Production/cropping regions
10. User education component in new pest management
11. Compare benefits compared with building state capacity
12. Consider existing resources constraints with individual universities - shared expertise valuable
13. Organize courses, conferences, etc. as focus for resources - not on facilities
14. Hands-on centers with demonstration capability valuable e.g. structural termite, seed treatment (e.g. structural termite, seed treatment)
15. State inspector training; consistency and standardization
16. WPS trainers
17. Existing program vs. new facility
18. Coordinate centers with curriculum coordination review/function

19. Combine with Pest Management Centers; virtual IPM centers - USDA
20. Concept generally supported
21. Consider different mechanisms: virtual, existing facility, new facilities

## **2.4 Establish network of subject experts for training and materials.**

### **A) Areas Where Experts are Needed**

1. Chemigation; Equipment - ag. engineering; Grain & Storage; Fumigation; Sewer root control; Aquatic; specialty categories --- product & application-specific; Aerial; Drift/calibration - application technology; Conflict resolution; PMP/Surface water; Toxicology; Mediation; Crop damage assessment; Drift - application technology; "New/specific categories" sewer root; chlorine - national manual & validated exam - identify experts available; Risk communication/dispute resolution; Training techniques; Civil litigation/liability (Michael Lexa); notification problem prevention; new delivery methods (e.g. broadcasts); program evaluation expertise; follow-through on use of training in field

### **B) Other Comments**

1. Invest in personnel - don't add to current workload
2. Incentives exist for cooperation
3. Master educators with costs (e.g. Vince Covello, Fred Whitford)
4. More resources
5. Bilingual materials/training programs
6. Follow-through on use of training in the field
7. Feedback for/from job analysis
8. Inspectors
9. Some losing expertise
10. Industry assistance
11. Need to bring in speakers; develop matrix also with costs (honoraria, etc.)
12. AAPSE involvement
13. Consider survey mechanism; identify and set priorities of needs
14. Train-the-trainer experts; different techniques
15. States need to adapt materials; need to edit discs - standard deliverable requirements
16. Resolve intellectual property rights issues
17. 2-way audio/visual technology
18. Also provide visual material
19. Need \$, people & time

## **Goal 3: Maintain the consistency, integrity and validity of the certification and recertification programs and processes.**

### **3.1 Establish prerequisite for minimum age, read/comprehend English label.**

#### **A) Comments on an English Prerequisite**

1. Spanish tests should have English labels (in test) (example: Oregon)
2. English requirement — test and label
3. Oral exam but still must read English label (Calif.)
4. Canada allows French or English exams
5. There are nuances in language which are not translatable
6. WPS drives this (label is issue)

#### **B) Comments on an Age Prerequisite**

1. Follow other rules & child labor laws
2. Mass. law 18 years (4 other states 18 years)
3. Children's health top priority with EPA

4. P.A. harder to set age limit
5. Minimum requirement age 18

### **C) Other Comments**

1. Being certified doesn't mean they spray
2. Commercial Applicator handles most hazardous
3. Any data?
4. Experience requirement — how do you prove it?
5. May have problems with state laws
6. AK. Oral exams
7. Safety is the issue/concern behind prerequisites

### **3.2 Provide minimum standard guidance for recertification training**

1. PANNA - CEUs (6 units, 3 years)
2. Other states recognize CEU credits
3. CEUs improves attendance at meetings (training)
4. Need standards for uniform quality (uniformity helps N.E. states)
5. Industry training can be commercial requires monitoring
6. Local issues need to be allowed (enf. problems)
7. State laws hinder state laws different
8. What is legitimate subject matter
9. No. of hours required for recertification affects flexibility of issuing CEUs
10. Difficult to standardize now
11. Would help reciprocity
12. States have different standards (some don't allow CEUs)
13. Recertification standards would be good
14. Gold book - standardized recertification (Nesheim and OK. have it)
15. National RR exams
16. Workshop to identify problems and solutions
17. Issue CEUs till die vs. periodic exam requirement

### **3.3 Test all applicators to use RUPs**

1. Written test to become certified applicator
2. Supervision rules still apply (R.O.W. example)
3. Some states don't have requirements (NE., OK.) no written exams p.a.
4. Human health concerns in MN. enabled closed book exam
5. Out of 30 people, all but 2 in favor of written exams for private applicators, all but 5 in favor of written exams for registered technicians
6. How do you measure competency w/o written exam
7. AK. has 25,000 (private applicators)
8. Powerful farm groups
9. Grants to start new testing program
10. Liability issue for issuing license to incompetent or illiterate person
11. Written exam
12. Need competent people to use hazardous chemical

### **3.4 Update content of exams and materials using test development process**

#### **A) Comments on Exams**

1. Need to develop Regional and national exams
2. High stakes involved; exam must be fair
3. Training materials limit exam writing
4. CTAG should support the development of valid & reliable certification exam requirements

5. Half & half (SLA/CES) write items

#### **B) Other Comments**

1. Cost and time are concerns
2. Regional EPA support would help
3. Establish grants
4. Supervision differences affects difficulty
5. Do states - Feds have to comply with EEO laws?
6. Commonly used category updated first
7. Updated nationals need funding and staff
8. Follow schedule
9. IL. has 9-year (recertification) cycle
10. Utah has CBT
11. SLA & CES should share
12. Need to prioritize

#### **3.5 Encourage reciprocity agreements through work groups & workshops**

1. Categories don't match in states
2. State laws
3. Definitions & tracking (laws & rule changes needed)
4. Reciprocity possible in selected categories
5. With exam valid some solutions come and will be standardized and uniform
6. Need to have workshop to identify roadblocks
7. Division chiefs and attorneys (solve)
8. Lumping vs. splitting present problems
9. Prerequisite standards differ
10. National standards eliminates this issue
11. N.W. states came to common grounds to overcome this
12. Funding affects states ability

#### **Goal 4: Ensure that adequate and equitable funding is available to pesticide safety education, training and certification programs.**

##### **4.1/2 Change federal funding formula to SLA & CES**

#### **A) Comments on Using the "Number of Farms" in the Formula**

1. Using number of farms is a bad "indicator" for allocating funds. Need base line amount
2. Number of farms doesn't address size; while numbers go down, size may go up
3. Do we even need # of farms in formula? (# is decreasing, larger farms are forming)
4. Abolish number of farms - focus on number of applicators

#### **B) Comments on Funding Base and Level**

1. Need reasonable funds to support key training person
2. Base funding needs to be increased (funding needs to support focal CES person)
3. Base level and collaborative projects with surrounding states to go to Congress to get more \$
4. Base formula on number of applicators (private and commercial) - base needs to go up
5. There's not enough \$ - why try to slice the pie differently when there's not enough?
6. No changes would be significant since Federal part is such a small portion of state program - need funding to support one full position

#### **C) Comments on Recertification**

1. More work done on recertification - needs to be taken into consideration
2. Recertification cycle needs to be taken into account
3. Years for recertifying differ from state to state that will impact the numbers used in applying the

formula

4. CES formula needs to address both certification and recertification
5. Recertification cycle affects level of work/#s reported in any given year

#### **D) Comments on Workload**

1. Number of specialty categories adds workload (training for initiatives)
2. Need to factor in cost of training for different categories (workload)
3. Federal program/formula doesn't cover funding for general use pesticides
4. Formula doesn't reflect initiative (i.e. WPS) training, also doesn't address other levels of state mandated training (certified vs. licensees /technicians)
5. Audience for training could change to include users of general use
6. Formula doesn't include other efforts - (disposal, collection programs, stewardship)
7. Changes in program (i.e. # of farms decreasing) needs to be reflected - training done by industry
8. Time requirement/contact hours
9. Number of applicators and hours need to be factored in
10. Consider the number of programs - (# of applicators may go down but may still need to conduct training)
11. Private applicator numbers are going down as farms go out of production - so may need to look at that part of formula

#### **E) Other Comments**

1. "Since inception" may not reflect what we are actually doing today
2. Change percentage used in formula
3. Numbers that CES reports give contact hours and numbers trained - recommend that contact hours be used for training/extension formula
4. 50/50 match unfair - the state match seen as a "maintenance of program" and there are unfunded mandates (WPS, ES, GW training)
5. Urban/structural doesn't get addressed
6. Need no. of applicators, volume of pesticides used and urban use
7. Applicator (may not be certified) performing under supervisor (certified) - maybe eliminate the "under supervision of"
8. Add pest burden to formula (likelihood of pest, seasonality of pests, etc.)
9. Formula doesn't include urban/structural
10. Add some of program \$ (GW, ES, WPS) to the C&T pot
11. Need to be able to "anticipate" level of funding to be maintained for training
12. When an SLA does certification & training, how does formula address?
13. 50/50 match could be a problem

#### **4.3 Assess a pesticide registration fee to help cover program costs**

1. Yes - registrant should help pay for the program
2. Federal fee - yes - some states couldn't do this, or if they did \$ wouldn't get to program
3. State registration fees, sales tax on pesticides - if state would put \$ in program, it'd likely to go to the general fund
4. YES on federal registration fee - and pass \$ down to states to support program and specify for use — industry may support if \$ goes toward safety training
5. Federal tolerance fees, maintenance fee already discussed/occurring
6. Discrepancy between RUPs/General use and fee charged
7. Can't always control where registration fee goes (general fund vs. program)
8. Federal Register with \$ going to C&T (SLA and CES) - manufacturer benefits from what we do
9. Fee for service - currently being looked at by Headquarters - AAPSE get active now
10. Registration fees for non-agricultural issues may not currently be supported - as benefits (training) not currently there
11. If we require a registration fee, need to get buy-in and how we charge that fee for urban vs. ag - RUP vs. general - may impact our ability to get buy-in

12. FQPA may create declining revenue source so may look @ other avenue for funding from registration fee

#### **4.4 Explore and share information on supplemental funding**

1. Willing to share information - probably unless it's a competitive source
2. Sources: charge for training, sales tax (retailer), user fee, fines, USDA matching funds needed
3. Use new strategic plan with "sales pitch" (breast cancer or other high visible issue) to seek new funds; reduced risk/use, reduce environmental impacts (off-set enforcement cost of training)
4. Training for all pesticides - not just RUPs; 171 deals with RUPs- would need a statutory/regulation change; professionalism/pesticide safety - not just RUPs
5. Some federal terminology change (i.e. handlers vs. applicators)
6. What if FQPA takes away RUPs?
7. Report definitions (certified/licensees)
8. Sources: 1) cost of training - per hour; 2) surcharges on study material (cost = printing + time); 3) Associations - arrange logistics for training and charge a registration fee - after paying cost remainder of \$ given to CES (donation to program); 4) penalty/fee on non-compliance given as donation for training program; 5) EPA discretionary funds
9. AAPSE website a way to share
10. May not always be able to share information (competitive \$)
11. Partner with other state agencies (Department of Health, Dept. of Environmental Quality)
12. Partner with other environmental groups
13. State fee fund (Tennessee)
14. Grant \$ not a good long-term source
15. Private foundation
16. How can we impact getting more money? - partner with USDA IPM program; can't lobby, but work with those we serve; \$ should come from federal source
17. State registration fees to C&T
18. Charge for training; cost = quality
19. Train-the-trainer - privatizing training
20. USDA seek funding to at least match EPA \$ - EPA minimum funding maintained even if USDA gets \$ to match
21. Training fee per applicator (fee for service)
22. Sales tax on pesticide sales
23. State registration fee - some earmarked for training
24. Yes to USDA match

#### **Comments on Reporting:**

1. State (CES) are training folks that may only be licensees, however most eventually end up certified
2. Applicators may get certified in multiple categories and funding should support each time training/exam occurs
3. Need definitions: certified (federal), technician, licensees, does certification (include) only RUPs or are states including certification of general use applicators
4. FQPA is requiring more training, include homeowners - formula doesn't come close to covering this
5. Federal definition - certified Restricted Use Applicators
6. Need to clarify definition of training (i.e. people who attended - # of hits once website, etc.)
7. Clarify what "certified applicator" is by definition and what you are reporting
8. Also - need to define "training program"
9. More uniformity with Regions - clarification from Headquarters - Regions all follow that lead

#### **Goal 5: Improve the efficiency of program organizations and operations**

## **5.1 Improve capabilities for assessing program effectiveness**

### **A) Comments on Using Surveys**

1. Applicator surveys are one of the primary tools for measuring program accomplishments - combined with feedback on compliance information
2. Compile current state survey documents to find the current “standard” evaluation tools
3. Surveys as a measurement tool are useful - but some states have few people involved in program - so there would need to be a coordinated national survey process every few (five) years to have the survey process work (also - need to use a carrot to get completed survey)
4. Surveys should be done on local level - but funded/coordinated nationally
5. Survey tool may need to be regionalized and developed through national process to assure “valid” by statistical processes, etc.
6. Reemphasize that survey should not be from “DC”
7. Is there potential to use NASS survey with “add-on” pertaining to C&T/PAT issues; NASS is survey experts and offers great potential
8. National survey tool needs to be developed ONCE so resources aren’t wasted
9. Use pre-post test training data combined with surveys to document program accomplishments
10. Survey tools still offer best measurement tool - should be developed with validity process at national level - with clear purpose/intent and desired results in mind
11. Funds must be put into survey to assure it is really meeting needs - make sure it is going to achieve desired end-point

### **B) Comments on Data**

1. States have data regarding how certain practices have resulted in benefits
2. Compliance data is one piece of the data feedback loop in terms of contributing to measures of program success
3. Need to start gathering data for baseline on pesticide incidents, poisonings, etc. in order to look at trends/change for program measurement
4. Use insurance claim information as a source of data for program measures
5. Sharing information on incident data tracked would be useful
6. USDA GPRA data requirement is a good start for measures for CES

### **C) Other Comments**

1. Accomplishing some of the other CTAG goals may facilitate the development of common performance measures for use by all programs
2. Basic national measures have to reflect “FIFRA” minimum standards for accomplishments - and then there are additional measures to look at differences/variability in state programs
3. Land Grants have “plans of work” that could be a good starting point; documenting accomplishments is part of the plan
4. Limited # of states currently using strategic plans & standard performance measurement tools
5. In order to have national measures, there needs to be a greater level of national consistency - need to accomplish other CTAG goals to move in this direction
6. Using additional training requirements for violators has to be geared differently than standard C&T/PAT training
7. Getting registrants involved in training process (req state RUP or other vehicle to pressure registrant) to induce behavioral change
8. Use bad actors “scared straight” philosophy to get to applicators
9. Use commodity groups to help target issues through their leadership/constituency
10. Make sure that programs are only having to document one set of accomplishments that answer to both USDA and EPA for national program measurement requirements
11. Encourage use of PREP to facilitate CES/SLA cooperation and development of joint strategic plans and program measures
12. Problem in measuring program is separating education vs. certification accomplishments
13. How do training outputs translate to environmental outcomes?
14. Equate competency thru examination to an environment gain/benefit

15. Real problem with trying to equate training with environmental outcomes (driver license program analogy)
16. Output measurements may be only tools - how do we develop best output measures?
17. Centralize evaluation mechanisms at regional level - using national funding source with STATE input - essential to process
18. Clear strategic plan with desired outcomes is essential to success of measurement effort
19. Need to demonstrate relationship between training and impact
20. Need to partner with other agencies to try and correlate training outcomes with environmental impact - need to get environmental data to help make case - but must be wary of false correlations
21. Need some national training program for states on how to evaluate programs and how to develop program measures and assess impacts/outcomes - then we may be better equipped for developing strategic plans/measures
22. Periodically assess the program measures to make sure we have proper measures
23. Need to collect current information from states on how they are measuring success/doing strategic planning
24. Keep ad-hoc steering committee (CTAG?) to keep C&T program issues continually addressed and maintain a strategic plan for the program that is current and maintains valid program measures
25. USDA does not have GPRA goals for PAT program - so the CES does not have clear direction for developing measures
26. Strategic planning process needs to be tied to parallel process similar to exam validation process
27. Encourage more frequent SLA/CES meetings to facilitate planning/and discussion/resolution of administrative issues
28. Demonstrating the benefits of the PAT/C&T program should be a #1 priority for the program - and find a way to publicize success (move 5.7 up as part of goal)
29. National program office at EPA/USDA needs to take the state CES accomplishment reports & compile information into a good national report — should be a condensed abstract style report that can be tailored to different groups/audiences
30. Under USDA competitive grants for food safety/water quality/ES/etc. there should be RFPs that call for assessment of changes in pesticide behavior as part of requirement for proposal

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