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Sent: Thursday, August 6, 2020 2:46 PM

To: Sherman Takatori <Sherman.Takatori@ISDA.IDAHO.GOV>; Brian Oakey
<Brian.Oakey@ISDA.IDAHO.GOV>

Subject: {External}questions

Hello Sherm and Brian,

The IPMA board has put together some questions regarding the latest rules draft.

If you could please answer these for us directly, I can pass it along to our board members and better prepare them for the August 11th deadline on comments.

Thank you,

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IPMA Questions for ISDA

A. Commercial Apprentice-There is still confusion with the Commercial Apprentice (CA) Category on the Professional License.

1. Since it appears there is a proposed fee for the Commercial Apprentice License under the Professional License, and this will be a new added fee in rule as a result, shouldn't this be considered a legislative fee rule? It is a new fee for applicators that did not exist before (\$120 for two years). This fee is somewhat hidden now in all the conversations and discussions.

2. It also appears that this proposed CA category is a category on the Professional License and not a stand-alone license, and fees will be administered just like any other Professional License, (\$120 for a two-year license, \$60 for a one year (less than 13 months due to last name). What happens if you start out with a two-year CA category, but 3 months in, you pass and pay for exams as required, e.g. CO, OH. Now you are not working off your CA category, but your CO and OH categories. Do you need 15 recertification points now at this point. Will there be a cut-off period on these situations? This will come up frequently.

3. Can you have a CA License for one category like OH, and a separate Professional License designation for another category like OI? As soon as you pass and pay for one category exam, are you obligated not to have a CA license anymore? If an applicator cannot do both services on a property, that would be a problem just like we have now. It may cause managers to hold off on paying for a passed exam until the CA employee passes all the exams he is taking. This could be confusing for your inspectors and need clarification in rule.

4. Since the Commercial Apprentice category as written, is considered a professional license category, you could oddly possibly possess this type of licensing for up to 36 months. If you start the license in the 2nd year of your two-year timing (2nd year of A-L or M-Z last name license) license for less than 13 months, you would be allowed to renew once for an additional 24 months (12 +24 +36 months) with only the CO and Commercial Apprentice (CA) categories. You also would not need any recertification points during that period. It seems this is not the intent of this license. Shouldn't these training professional applicators need recertification just like other applicators to increase their knowledge? Rule says Professional Applicators must recertify by recertification points or retesting. Not arguing with the Commercial Apprentice License need, but the possibility of three years seemed extensive for a training license that originally was limited to one year in rulemaking. Again, not sure this is the intent of the CA License.

B. Yellow vs Blue – It appears many category application definitions are being changed with the proposed rules, and on some, these changes are welcomed. For example, RC vs GP on types of rodent control applications, OI vs GP on spider barriers, PH vs GP on mosquito treatments, AH vs RW for right of ways. To company managers, these changes would be considered substantial, and should not be considered or deemed redundant or confusing changes in the blue category. If people are grandfathered in, how will ISDA and Industry Managers keep track on these category changes with existing and/or new applicators not grandfathered in? This seems more confusing than before for industry and inspectors. Will someone have a designation of old "GP"

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vs new "GP", or will they need to know the cut-off dates for one definition vs the other? Seems complicated and confusing.

C. During the Negotiated Rulemaking meeting on August 4, 2020 Sherm Takatori explained that the General Pest (GP) category will be the appropriate category for urban mosquito control applications unless applications to foliage are made, and then OI would be needed. Just a note that most current industry national studies recommend that underneath plant foliage (leaves) should be treated for mosquito harborage. This is done for mosquitos' harborage only and not to control plant or foliar damaging pests. These types of foliar applications should be allowed under the GP category also since it is part of the control recommendations on product labels and methods. Similarly, there are recommendations to treat small home ponds or wetlands with larvicide, as abatement districts may do. Will the GP cover these situations? This could get complicated if you need GP, OI, AP or PH to treat for mosquitos now. How will inspectors handle this for use inspections?