
From: "abates@idpma.org" <abates@idpma.org>
Date: August 11, 2020 at 1:13:15 PM MDT
To: Brian Oakey <brian.oakey@isda.idaho.gov>
Subject: {External} **RE:** {External} questions

Hi Brian,

For the most part the IPMA doesn't have a problem with much of the proposed legislative rulemaking and the perceived needs. That said, there seems to be a lot of questions about clarity within the content of the rule changes. Sometime back, statues were changed by some industry people and a Legislator to define Incidental Applicators and who needed to be licensed. The law was changed but it has caused much confusion and more problems than necessary for spot treating weeds or pests. Also, when the Governor vetoed the Aerial Applicator Rule last year, it was stated there was a lot of industry confusion and public knowledge. We would like to avoid that especially from our end on giving guidance out to our members.

For example, the board was under the impression that the Commercial Apprentice License would be a stand-alone license that would be allowed for up to one year with a one-year fee attached. This could be used as a training tool. The board debated the good and bad on this but agreed it could be beneficial for industry if managed properly. Industry integrity and diminished professionalism were questioned, but the thought was it could be a good introductory training tool. Looking at the comments, it appears there were many concerns for this license. Without asking for our input, the direction of this suddenly changed, and now a possible 2 or even 3-year category would be available with a Professional license fee(s) without any recertification required, as other licensed people are required to have. There are now questions of why has the intent and direction changed? We are concerned that this makes licenses less honorary and important. The one-year Apprentice License seemed a better fit and pushed for the Apprentice to pass the exams in that one-year time period. There is a concern that if it takes a person longer than a year to get trained and pass the exams, then the person should not be licensed for one reason or another. It seems it is forgotten that licenses are a privilege and not a right. Now it appears this is a just a way to reduce the number of returning testers and failed test scores since this obviously takes a lot of inspector's time and state funding. It also seems like striking out the CO cost section but adding it as a category seems hidden and not transparent to the viewer

or user. With the first draft there was support for the Commercial Apprentice concept.

The changes associated with categories don't really cause much concern, but there is confusion with what happens under certain situations or scenarios that could come up. We would rather these situations be looked at now, so policies won't need to be made after the rules are in place. Sherm made a comment about the GP category in the meeting that didn't seem logical for control means, with needing the OI instead. The Reciprocal Agreements with other states need more research since we have large urban areas next to other states urban areas. If the agreements are lost, that will be an issue for industry. The answer given to me in the meeting seemed like it wasn't a problem, like if it happens, it happens. Since you already said in your "Email to Stakeholders" that there would be no impact on current licensed applicators with the categories, and their categories would still be considered the same and grandfathered in, IPMA thinks those rule changes are acceptable.

Thanks for your time,

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