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IPMA is the premier voice for Idaho's pest management industries with the primary goal of protecting the health, property, and general welfare of our clients.

June 14, 2023

To: Lloyd Knight and Ryan Ward

From: IPMA

Re: IDAPA Rulemaking - Continuing Educational Credits

We were discussing the Option 4 points and had some questions we would like answered before the June 29, 2023, negotiated rulemaking meeting, so we can discuss more. They are listed below.

Option 4

To recertify a license an applicator must accumulate 16 credits earned by attending accredited (1 CEU = 50-minutes of instruction) seminars. The credits must be comprised of a minimum of:

1. 8 Core credits
2. 2 credits per category held.
3. Once a license holder has earned the 2 credits per category, the remaining credits may be earned in any category.

1. Example #1 – License 12345 – CO, OP
 1. 8 Core credits
 2. 2 Ornamental Pest credits
 3. 6 credits from any ISDA approved seminar with any designation
 4. TOTAL = 16 credits

2. Example #2 – License 12346 – CO, AC, RW
 1. 8 Core
 2. 2 Agricultural Crop credits
 3. 2 Right Away credits
 4. 4 credits from any ISDA approved seminar with any designation.
 5. TOTAL = 16 credits

3. Example #3 – License 12347 – CO, IP, OP, NS, AP
 1. 8 Core credits
 2. 2 Industrial Pest credits
 3. 2 Ornamental Pest credits
 4. 2 Non-Soil Fumigation credits
 5. 2 Aquatic Pest credits
 6. TOTAL = 16 credits

4. Example #4 – License 12348 – CO, AC, AF, AP, CH, FP, LP, NS, RP, SF
 1. 8 Core credits
 2. 2 Agricultural Pest credits
 3. 2 Anti-Fouling Coating credits
 4. 2 Aquatic Pest credits
 5. 2 Chemigation credits
 6. 2 Forest Pest credits
 7. 2 Livestock Pest credits
 8. 2 Non-Soil Fumigation credits
 9. 2 Regulatory Pest credits
 10. 2 Soil Fumigation credits
 11. TOTAL = 26 credits

*If a license holder earns the 8 Core credits, and earns the 16 credits, but fails to earn credits specific to one or more categories held, the license will be issued, but the categories where credits were not earned will not be on the newly issued license, and the license holder will have to retest to become certified in those deficient categories.

Questions from IPMA

1. What will happen with Private Applicators and the two-year 6 credits requirements they need for recertification? If they are attending the same 50-minute seminars, shouldn't they need 7 points now (6 x 10 minutes = 60 extra minutes needed)? And if they have categories on their license, shouldn't they attend at least one (1) category specific course credit for each category like SF or CH? This should be consistent with Professional Applicators for recertification requirements.
2. How will individuals with both Professional and Private licenses be handled with recertification requirements? Category specific needs?
3. How will Licensed Applicators with the CR (Consultant and Research) category get points to suffice this category's requirements? If they go to an AP training, doesn't it suffice both AP and CR?

4. Some categories have few training opportunities in the state and/or those listed on the ISDA website (examples like AP, FE, or AFC). Will ISDA offer more opportunities for recertification for these types of category specific training? Maybe other state's approvals accepted for training requirements (not just reciprocal states)?
5. How will ISDA monitor and list category specific recertification points for applicators, so they are aware of their current points and those future recertification needs?
6. We request an addition to the rule that the recertification credits-earned search page must be updated monthly by ISDA, including category specific training attended for applicators. At this time the last time this page was updated was 2/24/2023. This database should be updated each month for use, transparency, and functionality. Other states actually have databases that say a certain two-year category-specific recertification requirement has been met.
7. If an individual adds categories to his/her license, will they need category-specific recertification during that current license period for those added categories?
8. Some categories overlap like FE or AP/AC or RW and AC? How will the overlapping be handled with recertification credits?
9. How will reciprocal state licenses be handled since other states may not have the same requirements now?
10. How would this option affect Dealer Licenses?

Submitted by:
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