



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

February 21, 2017

Luther Smith, Certified Association Executive
Director of Professional Development and Business Relations
American Society of Agronomy (ASA)
Soil Science Society of America (SSSA)
Crop Science Society of America (CSSA)
5585 Guilford Road
Madison, WI 53711

Dear Mr. Smith:

In November 2015, EPA published a final rule revising the Worker Protection Standard (WPS) that changed the conditions for the WPS exemption for certified crop advisers that was contained in the 1992 WPS. This change requires us to revisit EPA's written recognition of the International Certified Crop Adviser's (ICCA) certified crop adviser (CCA) certification program, as administered through the American Society of Agronomy (ASA), as one that meets all of the requirements established in the WPS for exempting certified crop advisers from specific listed requirements of the rule as specified in the exemption at § 170.601(b) of the revised rule.

Specifically, EPA wishes to note that the revised exemption only applies to certified crop advisers themselves, and no longer applies to any persons doing crop advising tasks under their supervision. Additionally, EPA's recognition of the ICCA's program including its affiliated programs is based on the ICCA's commitment to ensure that after January 2, 2018, all individuals completing the ICCA's program or its affiliated certification programs, and those continuing their certification under the ICCA's program or its affiliated programs, will complete training that includes all the information in § 170.501(c)(3) of the revised rule (i.e., all of the revised training content required for WPS handler training).

The ICCA's program and its affiliated programs may accomplish this by either incorporating the required training content into the ICCA's training and recertification/continuing education program or by requiring all individuals completing (or maintaining) the certification program to watch any EPA-approved handler training video (approved for meeting 2018 WPS handler training requirements). As noted during our prior discussions, there is no requirement for

persons certified as crop advisers in accordance with the WPS exemption requirements to complete WPS handler training annually; the training content only needs to be covered in their initial training and certification, or in their 2018 continuing education as applicable. As long as the person maintains their ICCA or affiliated CCA certification, they will not need to go through the WPS handler training content annually to meet the WPS requirements and qualify for the certified crop adviser exemption.

Please note that EPA's approval of the ICCA's program and its affiliated programs continues to be based on the rigorous training and certification program requirements of the program which includes the following elements:

- (1) Pass two comprehensive exams (international and local board), covering four competency areas: nutrient management; soil and water management; integrated pest management; and crop management;
- (2) Meet ICCA's experience and education requirements:
 - a. Have at least two years of experience with at least a Bachelor of Science degree in an agronomy related field; or
 - b. Have at least three years of experience with an Associate Degree in an agronomy related field; or
 - c. Have at least four years of experience with no degree;
- (3) Sign and agree to uphold the "CCA Code of Ethics"; and
- (4) Earn 40 Continuing Education Units (CEUs) every two years with at least five CEUs in each of the four competency areas.

Any changes to the above elements must be submitted to EPA. EPA will then reexamine the program to determine if it still meets the requirements set forth in the WPS.

EPA's recognition of the ICCA's and its affiliated CCA programs precludes you from having to seek recognition of the program(s) through the State and Tribal pesticide enforcement programs, and this letter will document that EPA has recognized your program in writing in accordance with § 170.601(b)(1) of the revised rule and confirms that persons certified under the ICCA's program or its affiliated programs qualify for the WPS certified crop adviser exemption in § 170.601(b). Thanks for your continued efforts to support implementation of the revised WPS.

Sincerely,



Kevin Keaney, Chief
Certification and Worker Protection Branch