

December 22, 2006

(651) 201-6615

Dean Herzfeld
Coordinator Pesticide Safety & Environmental Education
University of Minnesota
Department of Plant Pathology
495 Borlaug Hall
1991 Upper Buford Circle
St. Paul, MN 55108

Dear Mr. Herzfeld:

SUBJECT: Administration of MDA Private Pesticide Applicator Recertification Policies by UME Staff

The Minnesota Department of Agriculture (MDA) supports the Private Pesticide Applicator (PPA) recertification change, whereby recertification credit is awarded to Certified PPAs, who attend a training workshop. Implementation of this change requires delegation of some regulatory responsibility to University of Minnesota Extension (UME) staff as the presence of MDA staff at PPA training workshops is unlikely.

MDA requests that you ensure UME Field Faculty administer these workshops in a manner consistent with MDA practices and policies. We want to ensure that UME staff is adequately training and prepared to carry out the laws and regulations of the state and those workshop participants are properly recertified.

As with any change of this magnitude, I do not expect to anticipate every situation and we will learn as we go. This change is as new for MDA and UME, as it is for PPA. I expect and fully support the fact that UME staff on-site will be required to make some decisions affecting PPA recertification credit for persons attending a workshop based on their judgment. It will be crucial to use lessons learned in an ongoing manner as a tool to assist UME staff in their role at these workshops.

MDA/UME CONTACT. You will be point of contact for MDA, and I will be your MDA contact. MDA communications will be routed through you; we will rely on you to communicate with UME Field Faculty administering these workshops. Similarly, questions from UME staff for MDA should in general be routed through you. For questions arise during the workshops that require deviation from these stated policies, or are not covered, UME Field Faculty should first make an effort to contact you. If they cannot contact you, UME staff will contact MDA directly by phone at 651-201-6633.

WORKSHOP LENGTH. Recertification training for private applicators must be a minimum of three hours in length. UME staff must be fully prepared and have access to adequate training materials to fill the require time of 180 minutes of instruction. Additional time will be added to the workshop length to accommodate late starts, breaks or other planned stoppages in the program.

TRAINING STANDARDS AND AGENDA. Training standards used to develop the workshop agenda are derived from those found in 40 CFR Part 171, as well as from other applicable federal laws, the Minnesota Pesticide Control Law and other state laws and rules. UME will develop the training agenda in advance of each training cycle. UME will provide the agenda to MDA for approval in advance. Minor workshop-to-workshop variation is expected to accommodate regional interest or presentation style; however adherence by workshop presenters to approved workshop standards and the overall agenda is required.

REGISTRATION FOR CREDIT. Each workshop participant must list the Private Applicator Identification Number and workshop code on their workshop registration form to properly obtain recertification credit. Each certified PPA is provided with an identification number on ID card provided by MDA. The number can also be found on the MDA web page at www.mda.state.mn.us, or by contacting MDA by phone at 651-201-6633.

Additionally, UME staff will provide participants with instructions regarding a unique workshop code which will be recorded on the application form. The code will identify year and location of the workshop.

IDENTITY VERIFICATION. Each workshop participant must be prepared to show identification. Anyone choosing not to show ID will not be given recertification credit. Persons who cannot verify their identity will not be given recertification credit.

The approved forms of identification are an official picture ID such as a Drivers License, and the Private Applicator ID Card provided by MDA to the applicator. Persons who do not have their Private Applicator ID Card may substitute some other form of identification (i.e. credit card, library card, etc).

Persons who do not have a photo ID by choice must show alternate forms of identification form with their name. These persons should be identified for MDA.

ABSENCE FROM SESSION. Persons must attend the entire workshop session to be awarded recertification credit, although MDA recognizes that occasionally circumstances arise which causes a person to miss a portion of the training. Persons who are absent from the training session for more than 15 minutes of workshop session time will be denied recertification credit. This includes arriving late or leaving early as well as leaving training in progress. Applicators that are denied recertification credit because of absence must attend another workshop in its entirety or test for recertification credit.

DISRUPTIVE PERSONS. Persons who disrupt the training sessions will be asked to leave by staff present. Excused persons will be denied recertification credit.

WORKSHOP CANCELLATION/POSTPONEMENT. UME staff on-site must be watchful to make certain workshop attendance does not create unreasonable travel risks for workshop participants. After consultation with the MDA Licensing and Certification Supervisor or a designee, UME staff may cancel, postpone, and/or suspend a recertification workshop because of bad weather, bad driving conditions, and/or other unforeseen circumstances when necessary to ensure workshop participant safety.

RECERTIFICATION CREDIT AWARD. UME will provide successful participants a temporary receipt indicating they have met their recertification requirements. The receipt is needed by person wishing to purchase restricted use pesticide prior to receiving the ID card for MDA. UME will also notify MDA of persons who successfully complete training. Recertification credit awarded by MDA will coincide with the date of recertification approval by UME.

Thank you for your help and collaboration on the new policy and these procedures. Please contact me or my staff with questions. If questions arise during the workshops You will deliver these orders when you visit the site.by phone at 651-201-6633.

Sincerely,

Joseph Spitzmueller
Supervisor, Licensing and Certification Unit
Pesticide and Fertilizer Management Division