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**Letter from Montana Department of Agriculture**

**Director Ron de Yong**

**RE: Private Applicator Training and Certification**

The US Environmental Protection Agency (EPA) has proposed increasing the requirements for private applicator training and certification. The result of these proposed changes is that our private applicator training and certification program will have to do more with less funding. To continue a strong program we need to discuss how to make the program, with the new proposed requirements, as efficient as possible and also discuss future funding mechanisms for meeting these new proposed requirements. This letter is a brief overview of the process we are just beginning.

EPA has proposed significant changes in the Certification of Pesticide Applicator Rule (40 CFR Part 171) that will affect all permitted and licensed pesticide applicators and state certification programs. EPA's proposed changes will increase necessary competencies for private applicators in the Pesticide Safety Education Program (PSEP), currently managed by Montana State University Extension Service (MSUES), so that they will mirror competencies for commercial applicators in the program managed by the Montana Department of Agriculture (MDA). The increase in requirements for the private applicator program will significantly reduce the differences between private applicator and commercial/government applicator programs.

Current pesticide training and certification programs are already struggling with adequate funding prior to these additional requirements. The MDA believes a discussion needs to occur on blending the private applicator program into the commercial applicator program to achieve greater efficiency, when EPA's proposals take effect in approximately two years. This option would have little to no effect on county extension agents. It would also allow state extension staff to focus on educational and outreach efforts related to the core private training and certification program that would be added to the commercial/government applicator programs run by the department. Any changes that are agreed to by stakeholders to prepare for EPA's changes in this area would impact Montana statute and would be subject to approval by the 2017 Legislature.

MDA has and will continue to reach out to MSUES and other stakeholders to work together developing a future strategy for the private applicator program. MDA will work with MSUES and other stakeholders on how to effectively communicate EPA changes and state statute and administrative rule changes to the pesticide applicator community and all perspective parties of interest. During this discussion period, all business processes will continue as usual for both programs, including the Memorandum of Agreement (MOA) between MDA and MSUES that currently affects the PSEP coordinator and the PAT Extension agents. The essential role of county extension agents will not change, regardless of the option being discussed. EPA's proposal, however, does include increased requirements in training and certification of private applicators.

For discussion purposes, MDA has included future roles for both MDA and MSUES (below) when the private applicator program is blended into the commercial programs at MDA to make it more cost effective.

### **Proposed Future Roles for MDA:**

MDA will offer Private Applicator Initial trainings for the Core/ Agricultural Plant Pest component to meet private applicator needs. MDA already conducts 2-3 Initial trainings each year for commercial/government applicators. This number will increase when the two programs are blended into one. Initial training will also be offered as an online course by 2017.

Because MDA already offers specific category training (if applicable) to private applicators, no foreseeable change is expected for this training other than an increase in the number of specific category trainings due to EPA's proposal.

MDA will proctor private applicator exams in designated areas around the state. MDA already has 7 proctored sites established around the state for exam taking. MDA would like to offer additional examination proctoring sites for applicators and will work with MUSES to see if agents can continue their role in proctoring exams.

MDA will approve recertification credits for training courses offered for private applicators. MDA already approves training courses for commercial/government applicators.

Private applicators will be able to access the MDA database for information on CEUs and licensing. Assistance from staff will be available to all pesticide applicators.

The focus of the pesticide applicator (commercial, government and private) training program will be initial and recertification training, certification, manual and examination development, training course approval, proctoring examinations and other related functions.

### **Proposed Future Roles for MSUES**

Proctoring pesticide applicator examinations at local Extension offices would provide additional locations for examinations and expand opportunities for all pesticide applicators wishing to certify or recertify by examination.

MSUES may continue to offer continuing education for pesticide applicator credit. Courses may be submitted to the department for approval and assignment of Continuing Education Credits (CEU).

There have been a number of activities related to pesticides that MSUES conducts that, while not falling within pesticide applicator training and certification responsibilities, fit well within the core functions of the university, e.g., news releases, outreach, publications, training tools, and recommendations, and certainly have value to agriculture and the public.

We look forward to working with MSUES and Extension Agents in continuing to provide this service and improving agriculture in Montana. If you have any questions or concerns, please contact Linda Johns at MDA at (406) 444-3676 or [ljohns@mt.gov](mailto:ljohns@mt.gov)

Sincerely,



Ron de Yong

Director, Montana Department of Agriculture