



ISDA was asked what about the possibility of an Apprentice type permit for unlicensed pesticide applicators that would allow an unlicensed person to apply GUPs with minimal supervision. ISDA wants to know your opinion on this proposal. There are a few examples out there in some of the states and we have looked at how these states structured these types of permits. What we are considering for an apprentice permit is as follows:

- The permit holder would need to meet the minimum standards for licensing except passing the specific category certification(s),
- The permit holder would need to demonstrate a minimum competency for regulation and pesticide safety, which could be satisfied by passing the applicator Core examination (CO or Law and Safety)
- The permit would be valid for a limited time and non-renewable.

## IPMA comments regarding an Apprentice type permit

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I strongly think the department needs to proceed with this. I'm not sure how much trouble individuals have in passing the Core /Laws and Safety exams versus individual categories so there, most likely, will still be some hang-ups with certain individuals passing that test but it would certainly help the situation and a huge step in the right direction to help these companies out and I do agree that an apprentice should have some kind of understanding as to what he is doing.

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Looking at both sides of this:

### Good

1. It allows a person to train and learn on the job while studying for the exams.
2. It helps the company during difficult times like we are experiencing now.
3. A person can obviously bring in needed revenue/service for the company.

### Bad

1. It hurts credibility for the professional applicator industry.
2. Liability is increased for the company if mistakes happen.
3. Oregon has this already, but ODA managers say it puts off studying for/passing exams until the limited certification is about to expire. It is also a way to have temporary hires and then let them go..
4. ISDA hears the exams are too difficult for new people. Is this partly so they don't get abused on the exam success rates from companies?

My feelings are that in difficult times, like now, it can help get the work done, that may be needed to exist. That said, I think it also lowers standards that we as a professional organization strives to keep at the highest level. I would not like this.

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I think it would be a step forward. It would be vital to define what “minimal supervision” and “adequate communications” means. I think we should STRONGLY insist upon having a seat at the table in the defining process.

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I agree with much of what has been said, lower standards for an industry where certifications are simple to attain is a recipe for disaster. I mean these tests aren't “rocket horticulture”, and as such I believe I too would have to say it wouldn't be for me.

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I agree with the program and general consensus here. I do like that they need at least LS to apply for the program, but with that they should be fine. I personally think our overall “level of professionalism, competency and compliance” on the structural pest side is middle of the road (at best) here in Idaho, yet we have some of the most difficult exams to pass!

I do not think that applicators licensing is the solution to creating a more professional industry. I believe that any lack of professionalism we have in our local industry comes from low barriers to entry in our local industry. Your applicators are only going to be as good as the owners and management that oversee them. In my opinion applicators licensing is good because it tests competency, but I do not believe it educates or gauges knowledge/ability. I think many of these guys gain an extremely basic knowledge and then guess their way to a passing score. That is why everyone takes the tests 5-20 times before passing any given one and then rarely score above a 70.

I support ease of licensing, ultimately because I don't put much weight on licensing when it comes to the quality or ability of the applicator. My belief is that you control the quality of the industry by reasonable barriers to entry that ensure employer competency. You then put more weight on continuing education and training to ensure those employers and their applicators are always becoming more educated and furthering their overall professionalism.

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I do not look at it that we would be lowering standards but rather giving individuals an opportunity to learn on the job which will hopefully give them a better understanding when it comes to taking the tests. I do not foresee the labor problem getting any better anytime soon so it is going to be a major issue for companies to find experienced and skilled technicians for many years to come. All of the points are very valid, but I still feel the positives outweigh the negatives.

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Agreed. Just that they are entertaining this idea feels like a big step in the right direction for the landscape side. We have 4 guys that do nothing but apply pesticides and fertilizers full time and I have no qualms with us needing to have a solid understanding of these concepts before we start doing large scale applications, but we also have 30+ other guys that just need to be able to put on a backpack and spend a couple hours spot spraying weeds in beds when they are already at a property to mow and it takes a different approach to get them through the tests. I would love it if they could pass the laws and safety and then we could start introducing them to the weed ID and OH material as they are actively practicing what they are learning.

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I agree that it is a great way to get our guys licensed while contributing to the company.

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I completely agree with the need for workers out there, and many were hired very late. When I was at ISDA in charge of licensing, we tried to rationalize why turf industry testers taking OH and OI struggled so much with the exams. Other than the Statewide exam and Ag. Herbicide exam, these are probably the toughest exams and most frequently taken. By scores achieved, they were the toughest. People taking the Ag exams very often had an Ag. background. The pest control hires seemed to pass the exams by the second attempt, as frankly, the exams are a bit easier and the testers seem to have better preparation. Part of it for Ornamental exams is test preparation, part of it was calibration/math/chemistry types, labels use, and sadly reading comprehension.

These people are often good, strong workers, but had trouble with written exams which include story type problems, chemical names, mode of action, etc. The problem I saw was that the same people were not passing these exams 3-4 times, with scores in the 50-55% range at best. Many times, 30-40% scores the first time. They were even riding with experienced technicians while trying to pass the exams. Working all day and trying to study for an exam at night was a problem also. I guess another problem we used to see, was asking a trainee who was riding with a licensed technician, during a use inspection questions, and he/she would not even know what was in the tank he/she was spraying out of. That was scary. You would think if they were riding with someone, who was licensed, they would gain knowledge faster. Sometimes it did help a lot but sadly many times, it did not.

It seems like ISDA is giving like 3-4 exams times in the Treasure Valley per week now. Are we not seeing enough people applying for jobs or is it not passing the exams that is the problem? Again, just my take and feelings for an industry that has to defend itself with pesticide use already.

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I do agree that we need to do what we can to keep industry standards high. With that being said I do not necessarily think that an apprentice program if done correctly will be lowering standards in the industry. I actually think if done correctly it could possibly raise the standards. Providing that the apprentice is getting the proper on job training.

Our company faces the same dilemma, in that we have licensed applicators that are doing everyday applications in OH and OI. These applicators have very full schedules and we are all for licensing in these areas. I almost think that we could use another category for those that are mainly needing to put on a backpack sprayer to just spot spray weeds in planter areas. Not a category that would exclude people licensed in OH from spot spraying but would allow for spot spraying of glyphosate in planter beds with backpack type equipment. We have struggled to get foreman of maintenance crews to pass the OH exam. Several have passed the LS but have failed with OH multiple times.

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So I think we have two different things coming up here. The apprentice license in Oregon allows an apprentice to do the same applications as licensed applicators (using GUPs) do, in a training/learning period; it is like 3 or 6 months. A licensed applicator, like the manager can be cited if the trainee does wrong, since he has signed off on that person and is responsible for the person. I can't remember how long, but after that period they need to pass the correct exam and can't have the Apprentice certification again. It rarely would work for Ag. since food related pesticides are usually RUPs.

Now if you want people who just do spot treating, under a licensed company, to not have a need to have a license, that is an interpretation that the attorneys at ISDA made before with the rule for licensed applicators in licensed companies. Industry could ask ISDA to take a look at that again or modify the rule. This is different but a lot easier than the Apprentice certification, even for ISDA, but this would not apply to all kinds of industry obviously, but 80% of this problem relates to turf and ornamental work. For your concerns with spot weed treatments on landscapes this might be better since there are some people of other origins who would never pass the exams due to language barriers with the exams, and you may have the same problem down the line.

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I tend to agree with the other points and perspectives.

That said, the Pesticide Advisory Committee has been working on this for the past year or more and Sherm and others are working hard to find meaningful solutions to not just our "for profit" industry members but the other government entities that struggle with licensing of seasonal workers. I think we can satisfy all stakeholders and remain on the side of improving the professionalism of the industry and at the same time creating a path into the industry that will be beneficial for all.

Let's see where the discovery takes us, we have plenty of time before real concrete options are available for us to fine tune.

We have to advance the ball; I am certain every varying segment of the greater pesticide applicator industry will have a say before it is done.

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