



Mary-Ann Warmerdam
Director

Edmund G. Brown Jr.
Governor

March 25, 2011

PML 11-01

TO: County Agricultural Commissioners

SUBJECT: INTERIM PRIVATE APPLICATOR EXAM FOR RODENTICIDE USERS

Purpose This memorandum is written to provide County Agricultural Commissioners (CACs) and Deputy CACs with the option to proctor an interim Private Applicator examination for users of certain rodenticides. This special examination was developed in order to facilitate the certification of individuals that have been buying and applying chlorophacinone, and/or diphacinone.

Background The USEPA is in the process of reclassifying first generation anticoagulant vertebrate pest control pesticides (rodenticides) as RUP for certain production and non-production agricultural use settings. The rodenticides are used in settings that include croplands, orchards, rangelands, ditch banks, riverbanks, irrigation ditches, fence lines, and buffer strips. USEPA is taking this action to address adverse impacts on non-target animals, predominantly wildlife, even when used according to label directions. Users will now need to meet minimum application competency standards through examination to possess either a private or commercial applicator certification in order to purchase, use or supervise the use of these rodenticides.

The California Department of Food and Agriculture (CDFA) through a federal Special Local Needs registration (24C) provides CAC's with labeling that allows them to formulate and sell 0.005% and 0.01% chlorophacinone, and diphacinone rodenticides. Individuals who have used these materials in the past but have not been certified as pesticide applicators will need to become certified in order to continue their use.

Continued on next page



Solution

The registrant (CDFA) and the CACs through their Pesticide Regulatory Affairs Committee (PRAC) requested that the Department of Pesticide Regulation (DPR) develop a method to certify individuals that wish to continue to use these materials, without requiring them to take and pass the standard DPR Private Applicator Examination.

To this end, a committee was formed with participation from CDFA, PRAC, University of California Extension and DPR, so that members could discuss options and determine the most reasonable solution. After considering various options, it was determined by consensus that the approach would be to create an interim certification examination (Interim Exam) for new Private Applicators with questions geared toward vertebrate pest identification and control. This alternative was chosen because it was the only alternative that eliminated the need for new regulation and therefore made it possible to expedite the certification of these individuals more readily. Because this is to be an Interim Exam, it is to be administered by the CAC's for 15 months. Individuals that achieve 70% correct answers will receive the Private Applicator Certification, after which they will then be required to meet the same continuing education requirement to renew as a Private Applicator. Failure to do so will mean that they must become re-certified by taking the standard Private Applicator exam.

After 30 June 2012, the use of the exam will expire and individuals that wish to use any restricted materials must pass the standard Private Applicator exam or other appropriate license type, as the interim exam will no longer be given.

**Examination
Development**

Once the solution was determined, a smaller subcommittee was formed to develop the questions and answer key for the Interim Examination. Members of the subcommittee included staff from DPR Pest Management and Licensing, DPR Enforcement, CACs and UC Extension. The subcommittee met in February to identify the study materials and to develop exam questions. An Interim Exam with 63 questions was developed, and is being sent to you. Recommended study material includes the existing Private Applicator study guide as well as UCIPM web sites on topics of vertebrate pest identification and management.

Continued on next page

County Agricultural Commissioner
March 25, 2011
Page 3

**Procedures
for Use**

This examination will be made available to CACs, for their administration using standard Examination Administration and Security procedures (attached). The use of this Interim Exam will expire on 31 May 2012.

**Comments
Requested**

DPR is interested in assessing the effectiveness of this Interim Exam procedure, as it may inform about future uses. To that end, your comments and suggestions, such as data regarding the number of individuals that take the exam, the number that pass, and any other difficulties or suggestions that you may experience in its application. At your convenience, please send this information to Margie Read at mread@cdpr.ca.gov

Sincerely,

Original signed by

David Duncan, Chief
Pest Management and Licensing Branch
(916) 445-3870

Enclosure: Exam Security Measures Agreement

cc: Dr. Nan Gorder, Chief, Enforcement Branch (w/Enclosure)
Mr. Tom Babb, DPR Agricultural Commissioner Liaison (w/Enclosure)
Ms. Margie Read, DPR Program Manager 1 (w/Enclosure)

**PRIVATE APPLICATOR EXAMINATION ADMINISTRATION
AND SECURITY PROCEDURES
MARCH 2011**

Department of Pesticide Regulation will make private applicator examinations available to County Agricultural Commissioners (CAC), for their administration using standard security procedures. Exam administration and security is recognized nationally as a critical feature of effective programs for certification and recertification of pesticide applicators. Additional guidance for these procedures can be found at the Certification and Training Assessment Group (CTAG) web page under the Resources for Manuals & Exams.

At a minimum, exam proctoring for pesticide applicator certificates must include the following:

1. Only authorized persons from the CAC office may administer exams.
2. Secure the questions and/or the answer keys must be keys in a location unavailable to individual test takers and unauthorized staff.
3. Examinations will begin with positive identification with photo-ID of exam candidates.
4. Individuals taking the exam must not have cell phones, personal calculators, notebooks, study material, etc.
5. Examinees must not be allowed to take any notes during the exam, unless these are left in the exam room when they leave.
6. Individuals taking the exam must not be allowed to sit adjacent to each other or in such a position that would allow them to share answers.

If you have any questions regarding these Administration and Security Procedures, please contact Margie Read, DPR Pest Management and Licensing at 916-445-1707, or mread@cdpr.ca.gov.