

ADDENDUM TO THE FINAL STATEMENT OF REASONS

Update of the Initial Statement of Reasons

DPR revised the following application forms: Continuing Education Approval DPR-PML-131 (Rev. 8/11) and Continuing Education Additional Presentation Request DPR-PML-132 (Rev. 8/11). These application forms, incorporated by reference, were revised to add clarifying language as well as other editorial changes. Some examples, such as “demonstrations or presentations of current applied research” in the first paragraph, and repetitive language, such as in section G, were deleted from page 2 of DPR-PML-131 in order to keep the length of the form within two pages. The examples are still accepted for course approval, if all other course criteria are met. In section D, the language about 15-minute breaks was removed because it was confusing CE sponsors when they completed this section of the form. This information is also not a requirement of filling out the form.

Overall, the revisions of this form were intended to simplify the process of filling out and submitting this form to DPR, and also intended to remove unnecessary components in order to limit the form to two pages.

Response to 45-Day Comments

Bill Gillespie

Comment: Final examination and review questions should be required for classroom courses.

Response: A final examination and review questions are required for online and correspondence courses as a way to ensure that licensees have read through and understand the course material. In contrast, classroom courses are conducted face-to-face, offering an in-person delivery of course material. Classroom courses also offer opportunities for attendees to interact with speakers and peers, leading to better understanding of the course material.

Comment: Performance standards should be used instead of prescriptive standards.

Response: The U.S. Environmental Protection Agency gives authority to DPR to ensure and maintain standards of competency in the use of pesticides equal to those outlined in Title 40, Code of Federal Regulations. DPR maintains that competency through the use of appropriate CE courses, approving and auditing CE courses as needed to maintain quality. The proposed regulations use prescriptive standards to better assess courses for length (hours) and content, allowing CE sponsors consistency in approval and uniform expectations of course quality, while still fulfilling DPR’s role in increasing the competency of licensees.

Alternatives Determination

The Director has determined that no alternative considered by DPR would be more effective in carrying out the purpose for which this regulation is proposed, would be as effective and less burdensome to affected private persons or businesses than the adopted regulations, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of the law.