

**Summary of Proposed California-Specific Certification & Training Requirements
Navigation of Text of Proposed Regulations and Initial Statement of Reasons**

This document may be used when navigating the text of proposed regulations in Title 3, California Code of Regulations (3 CCR) and the Initial Statement of Reasons for the proposed action concerning certification and training (C&T) requirements. This document is for informational purposes, and only identifies and summarizes proposed regulations that are specific to California. Please note that this document does not cover every provision in the proposed action and is only intended to provide a high-level summary of certain proposed regulations and their associated justifications. **For the complete proposed text, see the Text of Proposed Regulations. For the complete purpose and necessity of each proposed adoption, amendment, or repeal, see the Initial Statement of Reasons (ISOR). Please carefully review the entire rulemaking file, including the proposed regulatory text and ISOR, when commenting on this proposed action.**

3 CCR Section	Summary of Proposed California-Specific Changes and Justification	ISOR Page	Text Page
6000. Definitions	<p>“certified commercial applicator” definition is being amended for clarity to specify individuals this definition applies to in California.</p> <p>Definitions for the following terms are being added to explain the meaning of these terms as used in California regulations:</p> <ul style="list-style-type: none"> • “commercial park” • “incidental” • “industrial use” • “institutional use” 	Pages 3-6	Pages 1-3
40 CFR 171.101 – COMMERCIAL APPLICATOR CERTIFICATION CATEGORIES			
6530. Categories	<p><u><i>Addition of CA-specific details to category descriptions.</i></u></p> <p>Section 6530 currently lists categories that a commercial certified applicator may work in. Under 40 CFR, DPR is required to add a description of the pest control activities performed or supervised by a commercial applicator for each category they may be certified in. As a result, DPR has added a description for each category; however, for clarity, most category descriptions include examples of settings applicable to California, use settings currently maintained by DPR, and use settings/situations that would not be appropriate under a category. These CA-specific additions clarify when an applicator would require each category. While these descriptions</p>	Pages 7-12	Pages 22-24

	<p>include the above CA-specific details, the categories are consistent with those detailed in 40 CFR Part 171.</p> <p><u>Removal of CA-specific subcategories.</u> Removes existing commercial applicator subcategories (Sewer Line Root Control, Wood Preservation, Field Fumigation Pest Control, Microbial Pest Control, Anti-Fouling Tributyltin) as these categories are not available under 40 CFR Part 171. This will require some commercial applicators currently holding one or more of these subcategories to obtain the appropriate category(ies) consistent with proposed section 6530.</p>		
6531. Maintenance Gardener Pest Control Qualified Applicator Certificate – Subcategory Q	Adds description of pest control activities performed by a Maintenance Gardener to clarify when this subcategory would be required. This is an existing subcategory specific to California (FAC section 11704). Description added for consistency with the category descriptions added to section 6530.	Pages 12-13	Page 24
40 CFR 171.103 – STANDARDS FOR CERTIFICATION OF COMMERCIAL APPLICATORS			
6504. Examinations	<p>Subsection (b) – Adds requirement for license/certificate applicants to be able to read pesticide labeling. Visually impaired individuals would be unable to properly inspect equipment and assess potential hazards; this ensures public, personal, and environmental safety.</p> <ul style="list-style-type: none"> • (b)(3) – Adds existing requirement for apprentice pilots to pass a written examination that includes specific information concerning their aerial activities in addition to the currently required laws and regulations examination. This is consistent with FAC requirements (commencing with section 11905). • (b)(5) – Adds existing requirement for Maintenance Gardeners (CA-specific subcategory Q) to pass a written examination demonstrating knowledge of applicable pest management practices (FAC section 11704). This is also consistent with other license/certificate examination standards. <p>Subsection (c) – Adds a reference to FAC Division 7 to clarify that the regulations refer to licenses and certificates pursuant to both FAC Divisions 6 and 7, which is consistent with California law.</p> <p>Subsection (d) – Amended this section to only allow an applicant to request four examinations per application (vs. “at each time and place”). This is consistent with current practice and instructions specified on revised licensing application forms and is necessary for consistency.</p>	Pages 13-15	Pages 10-11

<p>6580.1. Examinations</p>	<p>Subsection (b) – Fumigant use by private applicators is being limited in California to a new certificate option: burrowing vertebrate pest control. Private applicators who want to continue using or supervising the use of a pesticide listed in section 6400 labeled as a fumigant to control burrowing vertebrates must pass an exam to obtain this new certificate option. In this subsection, competency standards are being established for this new private applicator certificate option. The listed competency standards align with 40 CFR 171.105(e), but only include those that are applicable to the proposed burrowing vertebrate pest fumigation certificate option.</p> <p>In general, fumigation activities are high risk applications that require specialized training and equipment to comply with pesticide labeling requirements. As a result, the proposed regulations limit private applicator fumigant use to situations that are most common to their pest control activities to ensure that these applicators possess the required knowledge, skills, and information to safely conduct the limited fumigation activity.</p>	<p>Page 17</p>	<p>Pages 28-29</p>
<p>6580.2. Certificate Issuance (subsections (a) and (c))</p>	<p>Subsection (a) – Adds existing requirement for private applicators to obtain a passing score of 70 percent or above on their examinations (FAC 14092(c)).</p> <p>Subsection (c) – This section specifies that an applicant who passes the exam to use or supervise the use of pesticides listed in section 6400 that are labeled as a fumigant and labeled for control of burrowing vertebrate pests will be issued an additional certification.</p>	<p>Page 18</p>	<p>Page 29</p>
<p>6582. Certificate Renewal (subsection (c))</p>	<p>Subsection (c) – Establishes a CA-specific approach to implementation of private applicator certificate (PAC) renewal to ensure that currently certified individuals and those seeking certification in the new burrowing vertebrate pest certificate option meet the federal competency standards. All existing PAC holders will be required to pass a revised core examination that includes improved federal competencies at their time of renewal. Subsection (c)(1) establishes that individuals who seek to continue conducting pest control activities as a private applicator must take and pass the revised PAC core examination to remain in compliance. Subsection (c)(2) clarifies that the requirements of 6582(c) do not apply to individuals who take and pass the PAC core exam on or after October 1, 2022 as the improved federal competencies will be included in the exam version(s) administered after that date.</p>	<p>Page 19</p>	<p>Page 30</p>
<p>6584. Continuing Education Requirements</p>	<p>Subsection (a) – Corrects a cross-reference to 6512, due to the reorganization of section 6512.</p> <p>Subsection (a)(2-3) – Minor rewording specifies that all CE hours must be on pest management and pesticides and that a minimum number of hours must pertain to pesticide law and regulations. This is intended to align with the requirements of section 6511 and types of approvable CE listed in section 6512.</p> <p>Subsection (c) – Establishes that CE records must be maintained in accordance with subsections 6513(b) and (c), aligning recordkeeping requirements for PACs with those for commercial applicators. This is also current DPR practice for PAC recordkeeping.</p>	<p>Page 19</p>	<p>Pages 30-31</p>

40 CFR 171.107 – STANDARDS FOR RECERTIFICATION OF CERTIFIED APPLICATORS			
6510. Renewals and New Applications	<p>Subsection (a) – Establishes the overall renewal requirements for individuals with a license or certificate (excluding Dealer Designated Agents and those specified in (b)). It requires CE hours for renewal to be obtained while the license/certificate is valid from DPR approved courses (currently required) and specifies that renewal application and fee submissions must be in accordance with existing Table 2 of section 6502. These are current DPR practices that have been added for clarity.</p> <p>Subsection (b) – Grammatical and editorial changes, and cross-references to applicable code sections are being made to clarify existing requirements.</p> <p>Subsection (c) – Adds existing requirement that individuals supervising operations of pest control businesses and pest control dealers must have their license/certificate renewed prior to the issuance of a business license renewal. This is a current requirement specified on business and dealer license renewal forms, incorporated by reference in section 6502, and is consistent with FAC sections 11701.5, 11702, and 12101.5.</p>	Page 20	Page 12
6511. Continuing Education Requirements	<p>Introduction – Clarifies that license/certificate holders are responsible for taking CE courses applicable to their license/certificate type, and that they will not receive credit for taking the same course more than once within the same calendar year. This ensures license/certificate holders receive CE hours on multiple topics by taking different courses that sufficiently cover pest management and pesticides, laws and regulations, and, if applicable, aerial pest control equipment and application techniques. This is also current DPR practice.</p> <p>Subsection (a) – Overall requirements reorganized and remains consistent with current DPR requirements. Reference to CE requirements for subcategories removed for consistency with removal of subcategories from section 6530.</p>	Pages 20-21	Pages 12-13
6512. Approval of Continuing Education Courses	<p>Subsections (a)-(c) & (e) – Incorporates existing requirements previously located in subsections 6512(i), 6512(a)(1)(E), 6512(e), 6512(e)(3), and 6512(h). Some specific clarifications or editorial edits have been made to improve clarity:</p> <ul style="list-style-type: none"> • Subsection (b) – Includes additional examples of CE topics that would be appropriate for CE credit in California. These are current practices (CE topics considered appropriate for approval) and further help to improve clarity for sponsors. • Subsection (c) – Specifies an overall standard for CE instructors or course developers (i.e., competent and knowledgeable) to ensure they can discuss in detail the topics that are presented during a CE course. This also ensures attendees receive the best knowledge and current information on the presented topics. This further helps to improve clarity for sponsors and ensures the quality of CE courses. 	Pages 21-23	Pages 13-16

	<p>Subsection (d) – Specifies that DPR will only approve up to 8 hours of CE per day for a course. This ensures that DPR can audit a CE course within a reasonable time frame (i.e., a single work day) as required by U.S. EPA and ensures that an individual can successfully complete a course within a reasonable timeframe.</p> <p>This subsection also specifies unacceptable formats for courses that will not be approved by DPR for CE hours. These formats are difficult to track and do not support the learning of new material and do not meet the course requirements in proposed sections 6512.1 and 6512.2.</p> <p>Note: Correspondence style courses will no longer be able to be submitted for CE. These courses are difficult to track attendance and participation. There are a limited number of these courses currently.</p>		
<p>6512.1. In-Person Continuing Education Courses</p>	<p>Overall, this section incorporates existing requirements from section 6512 regarding in-person course approval requests and only adds the following requirements:</p> <ul style="list-style-type: none"> • Subsection (a) – Adds requirement for approval requests to include total length of the course, which is needed by DPR to verify CE hours requested by sponsor and ensure course presentations that are not applicable for CE credit are not included in the total course time approved by DPR. • Subsection (c) – Describes what is considered a “concurrent presentation” and adds requirements for those types of submissions. The description ensures sponsors understand when requirements may apply to their course. The submission requirements are for consistency with those for regular in-person courses, and requires the attendance tracking description to ensure attendees only receive CE credit for the presentations they were present for. The requirement to submit the above items for each concurrent presentation will enable DPR to more easily evaluate and keep record of each unique course presentation. Acceptance of CE courses with concurrent presentations is current DPR practice; subsection (c) is included in regulation to clarify CE submission requirements for sponsors of courses with concurrent presentations. 	<p>Pages 23-24</p>	<p>Pages 16-17</p>
<p>6512.2. Interactive Online and Webinar Continuing Education Courses</p>	<p>Overall, this section incorporates existing requirements from section 6512 regarding in-person course approval requests as many also apply to interactive online/webinar courses. The following are new requirements:</p> <p>Subsection (a)</p> <ul style="list-style-type: none"> • <i>60-day submission</i> – Requires interactive online/webinar CE approval requests to be submitted at least 60 days before the course date to ensure DPR has sufficient time to review online and webinar courses, which have additional submission requirements/features, and work with sponsors to ensure all requirements are met. 	<p>Pages 24-29</p>	<p>Pages 17-19</p>

- *8-hour CE Credit* – Limits CE credit to 8 hours per application to ensure DPR can audit a CE course within a reasonable time frame, a single work day, as required by U.S. EPA and ensures an individual can successfully complete a course within a reasonable timeframe. Additionally, eight hours is consistent with the average amount of hours a full-time employee works on a weekday as reported by the U.S. Bureau of Labor Statistics.
- *Identity Verification* – Requires interactive online and webinar courses to provide an explanation of how the identity of an attendee will be verified. This ensures the correct individual is receiving CE credit (consistent with 6512.3(c)).

Subsection (b) – Adds list of features that interactive online/webinar CE courses must include, such as attendance and participation monitoring, tracking of time spent in the course, quizzes and examinations, etc. These features will better ensure attendees are actively participating, spending the required amount of time learning within the course and that they are receiving all course information. These features are also intended to mirror those that are successfully, and currently, used by Washington State Department of Agriculture and Oregon Department of Agriculture in their pesticide applicator recertification programs and are the consistent with features discussed in guidance published by the Certification and Training Assessment Group.

Subsection (c) – Adds requirements for interactive online/webinar quizzes and exams. Requires questions to be multiple choice and different versions of the quiz/exam to be available for retest. Multiple choice question formatting ensures attendees receive questions in a format consistent with DPR examinations and better prepares individuals for this examination format. Different versions of quizzes/exams ensure attendees have passed based on their knowledge of the content and not based on memorization of a failed quiz they took several times. All other items consistent with current DPR practices and existing requirements.

Subsection (d) – Specifies that courses approved in the preceding year must be updated to reflect current information and that the quiz/exam questions must be different from the previously approved course. This ensures course information is current, updated, and accurate, and that attendees are not memorizing a previous year’s course.

Subsection (e) – Incorporates current DPR requirements, and further clarifies that previously denied interactive online/webinar courses must be revised before being resubmitted as the need to make revisions prior to resubmission is a common misunderstanding for CE course sponsors.

<p>6512.3. Continuing Education Course Sponsor Requirements</p>	<p>Subsection (a) – Requires CE sponsors to ensure that advertisement of CE courses is true and not misleading. Ensures licensees take the appropriate advertised courses; this is current DPR practice.</p> <p>Subsection (b) – Requires sponsors to ensure course instructors, speakers, and content developers are competent and knowledgeable in the subject matter. This is added to clarify an overall standard for CE instructors/speakers. This is overall consistent with current DPR practice, and further helps to improve clarity for sponsors and ensures the quality of CE courses.</p> <p>Subsection (c) – Sponsors will be required to check a form of government-issued identification at in-person courses to ensure the correct individual is receiving CE credit. Also, adds a cross-reference to the interactive online and webinar course sponsor requirement detailed in 6512.2(a) for those types of courses.</p> <p>Subsection (d) – Requires sponsors to ensure a course follows the approved agenda, which ensures attendees receive the same amount of CE hours and information that the course has been approved for. Also requires sponsors to submit any course agenda or syllabus changes in writing to DPR and obtain approval for those changes. This clarifies how changes may be made after a course is approved and helps them avoid noncompliance with section 6512.4(a)(1). This is current DPR practice and also consistent with the process proposed in section 6512.1(e).</p> <p>Subsection (e) – Requires sponsors to have sufficient resources available for verifying and monitoring attendance and participation, and provides examples of these types of situations. This ensures there is a process to verify an attendee’s successful completion of a course and ensures the individual only receives credit for the time they spend present in a course.</p> <p>Subsection (f) – Specifies that CE credit is given on a one-to-one basis in the appropriate category; this clarifies that for each minute an attendee is present for a CE course, they would receive one minute of CE applicable for their renewal. This is current DPR practice, and the current structure used for CE courses, and is necessary to clarify how sponsors shall give credit and to provide transparency to attendees on how they will receive credit.</p> <p>Subsection (g) – Requires CE sponsors to only give records of course completion to attendees upon the conclusion of the attendee’s participation in the course that reflect the actual hours earned. This ensures a license/certificate holder only receives this record after the course has</p>	<p>Pages 29-30</p>	<p>Pages 19-20</p>
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	been completed and only receives CE hours for the portion of the course attended (if less than the full hours approved by DPR). This is current DPR practice.		
6512.4. Rejection or Revocation of Continuing Education Hours	Establishes that CE courses may be audited or monitored, and that approval of CE hours for a course may be revoked when it does not follow the approved agenda or syllabus or covers false information. This ensures attendees receive information that qualifies for CE and ensures sponsors cover the approved number of hours and content. Current DPR practices, included for regulatory clarity.	Page 31	Page 20
6513. Records of Continuing Education Courses	<p>Subsections (a)-(c) and (e) – Current DPR requirements; grammatical and editorial changes made to improve clarity.</p> <ul style="list-style-type: none"> • Subsection (e) – Adds requirement for records to also be submitted to CACs upon request <p>Subsection (d) – Requires CE instructors or sponsors to submit records to DPR within 14 days after completion of the course via DPR’s website or an electronic data file transfer process. DPR needs official CE records to confirm attendance during license and certificate renewal. This will make DPR’s renewal and CE verification process more streamlined as DPR will use the submitted information to verify that a license/certificate holder’s CE records summary sheet is consistent with DPR’s records. This information will also be used by DPR to resolve any attendance issues that may be in question for a license or certificate holder during renewal.</p>	Pages 31-32	Pages 20-21
40 CFR 171.201 – REQUIREMENTS FOR DIRECT SUPERVISION OF NONCERTIFIED APPLICATORS BY CERTIFIED APPLICATORS			
6404. Use Limitations (subsections (c) and (d))	Establishes limitation of fumigant use by certified private applicators. Also see summary of proposed change and justification for 6580.1.	Pages 33-34	Page 3-4
6406. Supervision Standards	<p>Subsection (a) – Specifies examples of individuals in California who are considered noncertified applications within the context of using restricted materials and RUP products. These examples are consistent with the definition of “noncertified applicator” in 40 CFR.</p> <p>Subsection (c) – Adds requirement for the certified applicator supervising the use of a restricted material to be physically present when required by pesticide product labeling to align with 40 CFR. California regulations and restricted material permit conditions are included to cover potential CA-specific situations that may require a certified applicator to be physically present.</p>	Pages 35-36	Pages 4-5
6540. Apprentice Pilot Supervision	Subsection (a) – Adds a cross-reference to section 6406, ensuring that the journeyman pilot is physically present if required by labeling, regulation, or permit conditions. For clarity and consistency between code sections and to ensure existing CA-specific situations are included.	Page 36	Page 25

	<p>Subsection (b) – As required by 40 CFR, requires the journeyman pilot to ensure a means for the apprentice to immediately communicate with them. For clarity, DPR is adding examples of types of communication that would be acceptable. Indirect communication, such as e-mail, text messaging, or voicemail, does not meet the requirement due to the delay time in communication associated with using these methods. These examples are necessary to distinguish what is considered immediate communication.</p>		
6612. Age	<p>Adds handling of restricted materials to existing prohibitions for minors under 18 and clarifies types of closed systems currently in regulation. Ensures age requirement applies to all appropriate situations in California. Note: 40 CFR provides an exemption, allowing immediate family members of private applicators to be 16 and older if certain conditions are met. This exemption would apply to very few individuals in California and the minimum age of 18 is consistent with other proposed requirements pertaining to admission to examinations and handling activities.</p>	Page 37	Page 31
6724. Handler Training	<p>Overall, subsection amendments are to meet the revised federal standards with clarifications added specific to California’s handler training, recordkeeping, and enforcement activities.</p> <p>Subsection (b)(17) – Amended to specify that training must cover the requirement that handlers using restricted materials must be at least the California-specific age of 18. This is for consistency with the proposed age requirement change in section 6612. Other amendments to subsection (b) are consistent with 40 CFR Part 171.</p> <p>Subsection (c) –Removes current specification that this requirement only applies to employees handling pesticides used for the commercial or research production of an agricultural commodity to ensure the requirement applies to all employees handling pesticides. This ensures any and <u>all</u> employees using pesticides are trained/taught in a setting where they are able to focus on the material with a trainer accessible to them during the presentation.</p> <p>Subsection (d) – Clarification added to specify the individuals in California who are considered trained (apprentice pilots). This clarification is important as apprentice pilots are defined as noncertified applicators per 6406(a), but through DPR’s examination process, possess the knowledge and skills consistent with handler training. Recordkeeping requirements for handlers clarified to include the required information to be included in record and the individuals in California this would apply to. Recordkeeping information/requirement overall consistent with 40 CFR Part 171.</p>	Pages 37-40	Pages 34-37

	<p>Subsection (e) – (Intro) Amends introduction to apply certain training recordkeeping requirements to <i>all</i> employees handling pesticides, ensuring a consistent statewide standard. Also, specifies that the record shall include information like the title of materials and name of the employer and trainer. This is for consistency with other California regulatory requirements and standards and to improve California enforcement activities as the provided information will help enforcement verify compliance.</p> <ul style="list-style-type: none"> • (e)(1) – Clarification added to specify who in California shall have access to training records. Amendments to this subsection are to meet the federal standard without creating duplicative information in California regulations. Tailored to California specific employer-employee system. • (e)(2) – Added clarification that records must include qualifications of the trainer of an employee handling California restricted materials. This info helps DPR ensure the employee was trained by a trainer who meets the criteria in 40 CFR and allows enforcement personnel to verify compliance. <p>Subsection (f) – Added clarification that the listed trainers can conduct training for employees handling California restricted materials for consistency with other proposed amendments and 40 CFR.</p>		
6731. Employee Communication	<p>Section overall consistent with federal standards regarding communication between the employee and supervising certified applicator, but includes California specific clarifications:</p> <ul style="list-style-type: none"> • Adds exception for apprentice pilots who already have requirements established in section 6540 • Adds examples of direct and indirect communication to provide clarity and ensure employers know what means of immediate communication are acceptable 	Pages 40-41	Page 37
6742. Safe Equipment (subsection (a))	<p>Incorporates 40 CFR requirement to instruct employees in the safe operation of any equipment related to pesticide use prior use of the equipment and annually thereafter; clarification added to ensure safe equipment applies to <i>all</i> employees in California. This better protects all employees handling pesticides and the environment.</p>	Page 41	Pages 37-38
40 CFR 171.303 – REQUIREMENTS FOR STATE CERTIFICATION PLANS			
6414. Permit Exemptions (subsection (g))	<p>Adds permit exemption for restricted material use only on Tribal land. This enables California pesticide dealers to sell restricted materials to these individuals without being provided a restricted materials permit as is typically required.</p>	Page 42	Page 5
6428. Agricultural Permit Applications and	<p>Adds requirement for the individual’s certification categories to be listed on the permit application. Added for consistency with other California regulation sections and to ensure complete information is captured for permits, dealers, and enforcement activities. This will</p>	Page 43	Pages 5-6

6430. Nonagricultural Permit Applications	further ensure pest control activities are performed by competent individuals licensed in the correct category(ies).		
6564. Appropriate Products (subsection (c))	Amendment to prohibit a pest control dealer from selling/delivering a restricted material to a certified applicator whose category(ies) or scope of certification do not allow for the intended pesticide use. Added for consistency with other California requirements and to ensure dealers, who play a critical role, ensure these pesticides are possessed by competent individuals.	Page 44	Page 26
6568. Dealer Responsibilities (subsection (b))	Clarifies that an individual certified by a Tribe or U.S. EPA as a certified applicator, under a U.S. EPA-approved certification plan, is considered a certified applicator for the purpose of this subsection. Amendments added to be consistent with other California regulation sections pertaining to information dealers must obtain and persons a dealer may provide a pesticide to.	Page 44	Pages 26-27
6622. Operator Identification Numbers	Minor clarifications made to ensure appropriate types of pesticide products are referenced and certified individuals are noted. Added “intended” to clarify that an operator of a property is required to obtain an operator identification number when any pesticide is intended for agricultural use, whether or not the pesticide is labeled for agricultural use.	Page 45	Pages 31-32
6624. Pesticide Use Records (subsection (c))	Amendments require time of application, start and end date and time, and method of application to be reported, which ensures the most accurate information about pesticide applications occurring in California is captured and provides all necessary information DPR may need pertaining to enforcement activities.	Pages 45-46	Page 32-33
6624.5. Commercial Applicator Restricted Material Use Records	Overall, additions to comply with federal standards, but reworded and tailored to California’s employer-employee relationship, operator I.D. uses, and the use of restricted materials.	Pages 46-47	Page 33
3 CCR AMENDED OR REPEALED SECTIONS			
6500. License Duration (subsection (c))	Specifies that certain individuals with a valid QAL or QAC will be issued an updated license or certificate reflecting updated categories beginning January 1, 2024. Ensures commercial applicators in mid-renewal cycle at the time of implementation have an accurate license and/or certificate that reflects the categories listed in 6530. Part of California’s specific implementation approach.	Page 47	Page 7
6522. Categories	Reworded and updated to reflect revisions to categories listed in 6530. Supervision standards for Maintenance Gardeners (subcategory Q) are being clarified and added for consistency with FAC 11704. This subcategory Q is not detailed in 40 CFR Part 171 and is specific to California.	Page 48	Page 21

6508. Notification of Change	Adds requirement to include a copy of government-issued proof for name changes. This is to be consistent with other identification requirements throughout California proposed regulations and confirm identity of name change. Also requires notification of changes to be in writing, ensuring DPR has documentation of these required changes.	Page 48	Page 11
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