

ARCHIVE: Archived due to the 2009 rule revision. Refer to VA30005.09.003 for the updated document.

TITLE: Complying with Continuing Education Requirements for Certified Professionals

DATE EFFECTIVE: August 2006

HISTORY: Update of VA30005.03.002 - Revision was necessary to clarify the guidance within the document. However, the technical content of the archived TDC document remains accurate.

KEYWORDS: VAP, certified professional, CP, continuing education, professional development hour units, PDHUs.

RULE/ AUTHORITY: OAC 3745-300-05(A)(4), (A)(10), (D)(6), (D)(7), and (D)(9) through (D)(11).

QUESTION 1: What is considered relevant continuing education for purposes of fulfilling certified professional rule requirements?

ANSWER: To maintain certification, the certified professional (CP) is required by OAC 3745-300-05(D)(6) to complete a minimum of twenty-four hours of professional development hour units (PDHUs) of relevant continuing education during the previous year of certification. As noted in OAC 3745-300-05(D)(6), if the required number of PDHUs is exceeded, the CP can request that a maximum of eight PDHUs be carried forward into the subsequent year.

In order to qualify for this annual requirement, a course or activity must meet the definition of “course”, as provided in OAC 3745-300-05(A)(4). A course is defined as “any educational activity with a clear purpose and objective which will maintain, improve, or expand the skills and knowledge relevant to the investigation, assessment or remediation of hazardous substances or petroleum”. Pursuant to OAC 3745-300-05(D)(7), these courses and activities can include:

- college courses from recognized educational institutions as defined in OAC 3745-300-05(A)(10),
- continuing education courses,
- seminars,
- in-house courses,
- workshops,
- technical or professional meetings, and

- conventions or conferences.

The above courses or activities may be taken in the form of on-line presentations (live and archived) and videotapes.

Ohio EPA does not compile a list of courses/activities which are applicable toward the continuing education recertification requirement. In general, courses that are relevant to activities authorized under the VAP regulations include the following categories:

- The investigation, assessment or remediation of hazardous substance or petroleum releases. Examples of relevant courses include risk assessment and ground water modeling, sampling methodologies, case studies, bioremediation, indoor air, and GIS.
- Compliance with the state and federal environmental regulatory programs listed in OAC 3745-300-02(C) as necessary for eligibility for participation in the VAP (e.g., underground injection control, solid and hazardous waste, underground storage tanks). Relevant courses/activities are those covering site assessment, remediation, removal, corrective action, or closure requirements under these programs.
- Certification courses, such as Asbestos Building Inspector, Asbestos Management Planner, Lead Hazard Abatement Risk Assessor, RCRA Hazardous Waste Generator.

As noted in OAC 3745-300-05(D)(10), PDHUs are not earned for worker health and safety training required under 29 Code of Federal Regulations 1910.120. In addition, courses/activities or parts thereof not applicable toward meeting the recertification requirement include but are not limited to:

- participation in public meetings that are held as part of the duties of the certified professional;
- those covering non-scientific or nontechnical subjects such as contract management, budget control, or similar management activities such as project organization and scheduling;
- regulatory programs of other states;
- voluntary action funding;
- legal liability;
- cost recovery;
- data management.

The Certified Professional Renewal Application Form instructions and OAC 3745-300-05(D)(11) contain the requirements for documentation to support the PDHUs claimed. Documentation must demonstrate

that the course/activity is relevant to activities authorized under the VAP rules.

QUESTION 2: How many PDHUs are earned for teaching or presenting the same course more than once in a certification period?

ANSWER: OAC 3745-300-05(D)(9) states that the initial presentation or instruction of relevant courses/activities earns twice the PDHUs that would be credited for attendance. Any subsequent presentations of the same material earn half the credit for each presentation. Thus, a 2-hour presentation would earn four PDHUs for the first presentation, two PDHUs for the second presentation, and one PDHU for the third presentation.

QUESTION 3: How does a CP document PDHU credit for a course that is offered within a certification period, but after the application is submitted?

ANSWER: If the course is necessary for the 24-hour minimum required to receive certification, indicate the name and number of credit hours of the course in the PDHU table in the renewal application, submit the agenda or registration form as preliminary documentation, then submit the documentation showing the course was taken as an addendum to the application (i.e., under affidavit).

If the course would count as carry-over credit, submit an addendum to the application (i.e., under affidavit), whether or not you have already received your certificate and letter indicating the number of carry-over hours, within 45 days after course attendance. You will receive acknowledgment of any additional carry-over hours from VAP staff, which needs to be included as part of the application documentation for the next year's renewal.

Please note: In order to receive credit for PDHUs, a CP must either list the PDHUs obtained in the original renewal application or submit the PDHU documentation as an addendum within 45 days after course attendance. PDHUs claimed after the fact in the subsequent renewal application cannot be counted for carry-over credit.

SUMMARY: In general, courses and activities that maintain, expand or improve the knowledge base required to investigate, assess or remediate hazardous substances or petroleum are eligible for continuing education credits for renewal of CP certification. A minimum of 24 PDHUs are required in each certification period. A maximum of eight PDHUs can be carried over to the next certification period. CPs

receive double credit for teaching or presenting courses for the initial presentation only. Courses that are taken after the renewal application is submitted can be credited with an addendum submitted 45 days after course attendance. Each time information is submitted as part of the renewal application, it must be accompanied by an original affidavit from the CP applicant.

If you have any questions concerning interpretation of the Certified Professional rule (OAC 3745-300-05) with respect to the relevance of a particular course/activity, submit information describing the subject material covered by the course/activity to the Voluntary Action Program for review prior to completion of the course/activity or submittal of your application.

OHIO EPA
CONTACT:

For any questions concerning this issue, please contact the VAP central office at (614) 644-2924.