ARCHIVE: **Archived due to the 2014 rule revision. Revision was necessary to update rule citations within the TGC. Refer to VA30005.14.001 for the updated document.**

TITLE: **Complying With Certified Professional Initial Training Requirements**

DATE EFFECTIVE: July 2012

HISTORY: Update of VA30005.09.002 - Revision was necessary to update the guidance to reflect changes in Voluntary Action Program (VAP) rule requirements that became effective in April 2012. Additional discussion and examples were included.

KEYWORDS: VAP, certified professional, CP, initial training, continuing education, Professional Development Hour Units, PDHUs.

RULE/ AUTHORITY: OAC 3745-300-05(A)(2)(d), (B)(3), and (C)(7).

BACKGROUND: The VAP Certified Professional (CP) rule contains an initial training requirement that pertains to new CP applicants for CP certification, as well as to existing CPs seeking renewal of their certification under certain circumstances. All new applicants must attend the initial training and include their certificate of completion of the training within their application. An application without documentation of the completed training is considered incomplete.

In addition, existing CPs must take the initial training before they can apply to renew their certification if they have not submitted to Ohio EPA a No Further Action (NFA) letter in support of a request of a covenant not to sue (CNS) in the previous four years. See OAC 3745-300-05(C)(7).

QUESTION 1: How often and where will the initial training be offered?

ANSWER: The training is offered based on need, usually every three months, typically in the Ohio EPA Columbus office. Anyone who is interested in attending a training session is encouraged to sign up for the interested party list. (http://ohioepa.custhelp.com/ci/documents/detail/2/subscriptionpage#DERR) Proposed dates are e-mailed to those who have subscribed to the list to select the most convenient

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date, and are notified of the final selection via e-mail. The selected date is posted on the web page with the agenda and registration form.

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QUESTION 2: What is the cost of the training?

ANSWER: The cost of the training is $200.00.

QUESTION 3: I took the training over a year ago. Can I apply for initial certification?

ANSWER: No. The training must be completed less than a year prior to the submittal of the initial application. See OAC 3745-300-05(A)(2)(d)(iv).

QUESTION 4: What if I missed the training requirement for renewal and my certification has expired?

ANSWER: You must complete the training before the director can renew your certification. Your renewal application should include the certificate of completion of the training. If you have already submitted your renewal application, it will not be considered complete until you have submitted the certificate in an addendum (under affidavit) to your application.

QUESTION 5: If I've only been a CP for less than four years, does the initial training requirement apply to me?

ANSWER: No; it's not until your application to renew in the fifth or a later year from your initial certification that the training requirement could apply. The requirement applies if more than four years has passed since you last submitted an NFA letter in support of a CNS request. Each CP who has been certified for less than four years has taken the Initial Training for the initial certification. The requirement does not come into effect again until the CP wants to renew certification for the fifth year and has not submitted an NFA letter in support of a CNS in the previous four years.

For example, if you took the training on May 9, 2006 in support of your initial certification, last submitted an NFA letter on February 1, 2008, and your certification period ends September 1, 2012, you would have to take the initial training again before you could apply to renew your certification (February 1, 2012 is the fourth year since the NFA letter, and your certificate expiration date of September 1, 2012 falls after that date). In other words, you would document completion of the training in your application for renewal of certification for a fifth year.

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QUESTION 6: I submitted an NFA letter requesting a CNS three years ago, but I let my certification lapse for over a year. Do I have to take the initial training prior to submitting an initial application?

ANSWER: Yes. Due to the certification lapse, renewal does not apply. However, you may seek recertification through an initial application. The initial training requirement applies to all initial applicants, even those who have been CPs before.

QUESTION 7: Last year I submitted a notification to Ohio EPA that I issued an NFA letter, but the volunteer did not want me to submit the NFA letter to request a CNS. Do I still have to meet the initial training requirement when I apply to renew my certification?

ANSWER: Yes because the requirement applies to a NFA letter with a request for a CNS. The purpose of the training requirement is to help ensure that CPs have kept current with the VAP rules, and this is determined through review of the submitted NFA letters. Remember to document completion of the training in your renewal application.

QUESTION 8: I submitted an NFA letter for a CNS over four years ago, but the CNS was issued less than four years ago. Do I still have to meet the initial training requirement?

ANSWER: Yes. The four year period is triggered by the initial submittal date, not by the date of any NFA letter addenda submitted, nor the CNS.

QUESTION 9: If I have received technical assistance from VAP staff in the past four years, do I meet the initial training requirements?

ANSWER: No. Technical assistance reviews generally do not cover all aspects of a voluntary action and do not meet the rule requirement.

QUESTION 10: Can I take the initial training for PDHU credit, even if I don't need it to meet the rule requirement?

ANSWER: Yes. If you take the training in your certification period, you would receive eight hours of PDHUs. However, in the event that space is limited, VAP would give attendance priority to

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those who need to take the training to meet the rule requirement.

QUESTION 11: Can I take the training more than once in my certification period for PDHU credits?

ANSWER: No. You can only earn PDHUs for the first attendance in the certification period.

QUESTION 12: Can I take the training if I'm not a CP nor plan to apply?

ANSWER: Yes. However, in case of limited space, CPs taking it to meet rule requirements and receive PDHUs get first priority.

SUMMARY: The initial training requirement was developed into rule in order to help assure that CPs who conduct voluntary work in Ohio keep their knowledge of VAP rules current. Therefore, new applications for initial CP certifications, and those CPs who have not submitted NFA letters to Ohio EPA requesting CNSs in the previous four years must take the initial training. CPs should then document completion of the training in their applications for renewal of certification. In these circumstances, applications for certification are not complete without completion of the training.

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

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