

ARCHIVE: Archived due to the 2014 rule revision. Revision was necessary to update rule citations within the TGC. Refer to VA 30005.14.002 for the updated document.

TITLE: Complying with Continuing Education Requirements for Certified Professionals

DATE EFFECTIVE: July 2012

HISTORY: Update of VA30005.09.003 - Revision was necessary to reflect changes in Voluntary Action Program (VAP) rule citations and language that became effective in April 2012. Also, additional discussion and examples were added.

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

RULES: OAC 3745-300-01, OAC 3745-300-05(C)(4) through (C)(12).

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 to fulfill continuing education requirements, and OAC 3745-300-05(C)(6) requires the CP to complete a minimum of twelve hours of professional development hour units (PDHUs) of relevant continuing education during the previous year of certification. The CP then documents the twelve or more PDHUs as part of the CP's complete application to Ohio EPA for timely renewal of certification. Please note: PDHUs received in excess of the required hours will no longer be carried over to the next certification period.

In order to qualify for this continuing education requirement in support of renewal applications, the PDHU activity must be any educational activity which will maintain, improve, or expand the skills and knowledge relevant to the investigation, assessment or remediation of hazardous substances or petroleum in Ohio.

Pursuant to OAC 3745-300-05(C)(8), these PDHU activities can include:

- college courses from recognized educational institutions as defined in OAC 3745-300-01,
 - continuing education courses,
 - seminars,
 - in-house courses,
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- workshops,
 - technical or professional meetings, and
 - conventions or conferences.

The above activities may also be taken in the form of on-line presentations (live or archived) or videotaped. Archived or videotaped courses cannot be older than two years to qualify, however.

All courses for CPs or consultants offered by the VAP or Site Assistance & Brownfield Revitalization (SABR) section will qualify for PDHUs. CPs are notified by e-mail when courses that qualify for PDHUs are scheduled. CPs can earn all the necessary credits for renewal by attending these courses, which include CP Coffees and Annual CP Training events.

QUESTION 2: How do I determine whether a course in addition to those offered by VAP or SABR qualifies for PDHUs?

ANSWER:

Submit the course information to the SABR staff for preapproval prior to attending and submitting your renewal application. If the course has been preapproved, SABR staff will inform you and post the course on the web page. Courses that are relevant to activities authorized under the VAP rules 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 that are relevant to Ohio sites.
- Compliance with the state and federal environmental regulatory programs listed in OAC 3745-300-02(B) 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 that qualify a CP to work in Ohio, such as those for asbestos building inspectors, asbestos management planners, lead hazard abatement risk assessors, and hazardous waste generators.

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QUESTION 3: Do all certification courses automatically qualify for PDHUs?

ANSWER: Pre-approval is recommended for all certification courses you are planning to attend. Some courses that are offered by national organizations and are not exempt from qualification (see Question 4) qualify for PDHUs, such as the asbestos courses offered by the U.S. Department of Health and Human Services, that cover federal requirements relevant to Ohio automatically qualify for PDHUs. Certification courses that are offered by another state and cover that state's rules (e.g., Pennsylvania's UST operator certification training) do not qualify.

Certification courses offered by other states for their equivalent to the VAP CP program (e.g., Massachusetts' Licensed Site Professional) may qualify for PDHUs on a case-by-case basis. Preapproval by the licensing boards of these other state programs do not automatically confer PDHU approval for Ohio's CP program. In order to determine whether another state's course qualifies for PDHUs, submit a detailed agenda of the course for preapproval to SABR staff.

QUESTION 4: What courses may not qualify for PDHUs?

ANSWER: As noted in OAC 3745-300-05(C)(11), PDHUs are not earned for worker health and safety training, such as that required under title 29 of the Code of Federal Regulations section 1910.120. In addition, courses/activities or parts thereof considered non-applicable toward meeting the VAP continuing education requirement for CPs include but are not limited to:

- courses involving site characterization or modeling that are not relevant to Ohio's geology/hydrogeology;
- participation in public meetings that are held as part of the duties of the certified professional;
- courses on subjects not pertaining to the investigation, assessment or remediation of hazardous substances or petroleum, such as funding, legal liability, cost recovery, data management, contract management, budget control, project organization and scheduling; or

- regulatory programs of other states.

Often environmental issues arise as a result of newly-developed industrial or commercial processes which have the potential for contamination. (A current example is the potential for environmental harm from induced hydraulic fracking to release natural gas for extraction.) Courses relevant to these issues qualify for PDHUs if they address the actual assessment of the contamination and associated remediation.

The Certified Professional Renewal Application Form instructions and OAC 3745-300-05(C)(12) contain the requirements for documentation needed to support the PDHUs claimed. Documentation in the application is to demonstrate that the PDHU course/activity taken by the CP fulfills the CP continuing education requirements under the VAP rules (see OAC 3745-300-05(C)(4)).

SUMMARY:

CPs must earn twelve PDHUs during their certification year and document the hours in the renewal application as part of the continuing education requirement for renewal of certification. CP courses offered by VAP and SABR are designed to assist CPs in meeting this requirement. Other types of technical courses can be submitted for preapproval for PDHUs for the VAP CP program. Courses that maintain, improve, or expand the CP's skills and knowledge relevant to the investigation, assessment or remediation of hazardous substances or petroleum in Ohio likely qualify.

**OHIO EPA
CONTACT:**

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