



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D. C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

March 9, 2017

Ms. Allison Jones  
Executive Vice President  
National Alliance of Independent Crop Consultants (NAICC)  
P.O. Box 209  
Vonore, TN 37885

Dear Ms. Jones:

In November 2015, EPA published a final rule revising the Worker Protection Standard (WPS) that changed the conditions for the WPS exemption for certified or licensed crop advisors that was contained in the 1992 WPS. This change requires us to update the previous April 1, 1996, letter to you recognizing the National Alliance of Independent Crop Consultants' (NAICC) certification program as one that meets all of the requirements established in the WPS for exempting certified or licensed crop advisors from specific listed requirements of the rule.

Specifically, EPA wishes to note that the revised exemption only applies to certified or licensed crop advisors themselves, and no longer applies to any persons doing crop advising tasks under their supervision. Additionally, EPA's continued recognition of the NAICC program is based on NAICC's commitment to ensure that after January 2, 2018, all individuals completing the NAICC certification program, and those continuing their certification under the NAICC program, will complete training that includes all the information in § 170.501(c)(3) of the revised rule (i.e., all of the revised training content for WPS handler training).

NAICC may accomplish this by either incorporating the required training content into NAICC's training and recertification/continuing education program or by requiring all individuals completing (or maintaining) the certification program to watch any EPA~ approved handler training video (approved for meeting 2018 WPS handler training requirements). As noted during our discussions, there is no requirement for persons certified or licensed as crop advisors/consultants in accordance with the WPS exemption requirements to complete WPS handler training annually; the training content only needs to be covered in their initial training and certification, or 2018 continuing education as applicable. As long as the person maintains their NAICC certification, they will not need to go through the WPS handler training content annually to meet the WPS requirements and qualify for the certified or licensed crop advisor exemption.

Please note that EPA's approval of the NAICC program continues to be based on the rigorous NAICC training and certification program requirements which includes the following elements:

- (1) Possess a B.S. or B.A. in Agriculture, Pest Management, or Biology (An individual with a four-year degree in a discipline other than Agriculture, Pest Management, or Biology with 10 years of crop consulting experience may petition the Certification Board);
- (2) Have six years of experience as a crop consultant providing crop management recommendations and/or technical data for a fee (five years of experience with a Master's Degree in Agriculture, Pest Management or Biology or four years with a doctorate degree in Agriculture, Pest Management or Biology);
- (3) Pass a state licensing exam or a state/regional CCA exam; and
- (4) Earn 36 Continuing Education Units per year to be reported at renewal time.

Any changes to the above elements must be submitted to EPA. EPA will then reexamine the program to determine if it still meets the requirements set forth in the WPS. EPA's recognition of the NAICC program precludes you from having to seek recognition of the program through the State and Tribal pesticide enforcement programs, and this letter will document that EPA has recognized your program in writing in accordance with § 170.601(b)(1) of the revised rule and confirms that persons certified under the NAICC program qualify for the WPS certified crop advisor exemption in § 170.601(b). Thanks for your continued efforts to support implementation of the revised WPS.

Sincerely,

A handwritten signature in black ink that reads "Kevin Keaney". The signature is written in a cursive, flowing style.

Kevin Keaney, Chief  
Certification and Worker Protection Branch