

MEMORANDUM

TO: Interested Parties

FROM: Don McKenzie, Water and Wastewater Section, Program Manager

DATE: July 25, 2006

SUBJECT: **Operator Certification, Policy Manual 20.7.1: “Make-up Hours”**—A Policy to Address the Avoidance of the Continuing Education Licensing Requirement

Background: The Operator Certification Program has become aware of a pattern where operators have failed to meet the continuing education requirements for more than one license renewal period. These operators do not submit documentation that they have taken sufficient continuing education and consequently lose their licenses at the end of the renewal period. They are able to regain their certification by passing the same level of exam during the next exam period. The purpose of the continuing education requirements stated in Water Quality Rules and Regulations, Chapter 5 is to ensure that the operators remain current in their fields and have the knowledge and skill necessary to protect public health and the environment.

The Operator Certification Program has noticed that operators have been failing to submit documentation of continuing education, letting their licenses expire, waiting four months, and retaking the exam in order to recertify. One operator has not submitted any documentation of training since 1968. Based on the number of operators fitting this pattern that were discovered during the 2004 renewal cycle, the Operator Certification Program estimates that six (6) dozen operators are regularly failing to meet the continuing education requirements.

The Operator Certification Committee reviewed the issue and recommended that the Operator Certification Program develop a policy to address the situation. The Committee recommended that, when a license was not renewed due to insufficient training hours, the person would be required to “make-up” these hours in order to qualify for recertification.

Policy 20.7.1 The intent of this policy is to ensure that operators obtain the required number of continuing education, or contact, hours per license each renewal period. After losing their licenses due to insufficient contact hours, operators shall not be able to regain any certification in the same area as the original certification by examination unless they demonstrate that they have obtained the full number of continuing education hours for the previous renewal cycle. They must “make up” the hours that they were short. For example, if an operator is short 13 hours to renew a license, documentation of at least 13 hours of training must accompany the application for any recertification examination in that area.

- 1) The total number of contact hours for each license renewal period is specified in Water Quality Rules and Regulations, Chapter 5.
- 2) Operators must demonstrate that they have obtained the required number of hours during the original renewal period or prior to the exam application deadline. Documentation that the training was

completed must be postmarked no later than the exam application deadline of the exam cycle in question. Exam application deadlines are specified in Water Quality Rules and Regulations, Chapter 5.

3) Make-up hours must be in the specific area of the certification (Water, Distribution, Wastewater, or Collection).

4) Make-up hours may not be used towards the next license renewal.

5) Operators may not avoid the requirement to make up hours by taking either a higher- or lower-level exam.

6) Make-up hours shall be required to qualify for any exam in the same area for a period of six years.

7) DEQ will advise operators of this policy in the renewal notification letter that is sent out in January or February of each year to operators whose licenses renew at the end of the calendar year. DEQ will also give presentations and write newsletters to ensure that operators are aware of this policy.