

# WPS Train-The-Trainer Programs

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## Approval Process and Criteria

5/25/2016

## EPA's Process and Criteria for Approving WPS Train-The-Trainer Programs

**Background:** EPA's revised Worker Protection Standard (WPS) was published as a final rule on November 2, 2015. The 2015 revision requires persons seeking to become trainers of workers and handlers through completing a Train-the-Trainer program to qualify by completing an *EPA-approved* Train-the-Trainer (TTT) program. This requirement becomes effective on January 2, 2017, meaning that a person must complete an EPA-approved program before that date to qualify as a WPS pesticide safety trainer for workers and/or handlers. EPA has prepared this guidance material to facilitate the development of programs that meet EPA requirements.

### 1. How do I request EPA's approval of my WPS TTT program?

You may request approval for a Train-the-Trainer program by email. The email submission to EPA should include:

- the requester's name, affiliation, contact information (email, telephone number),
- the materials in English,
- whether the program covers trainers of workers, handlers, or both,
- method of delivery (in-person, online, audiovisual, other media),
- non-English language translations planned & how translation will be verified as accurate,
- and if documentation of trainer's successful completion of the course will be provided, list the contents and, if possible, provide an example form.

**Format** - The materials should be in an electronic draft form to allow for editing based on EPA comments. A script and thorough description of content and key points will get a quicker review than a video alone.

**Language** - The materials should be submitted in English.

**Link between TTT materials and WPS requirements** - The materials should indicate how each point or section corresponds with required training elements for workers and handlers. Appendix A contains a numbered list of the training elements for workers. Appendix B contains a numbered list of the training elements for handlers. An example of a script (with annotations) for a training video follows:

Scene X – "How Pesticides Can Get into the Body"

Video script text: "Workers can come into contact with pesticides when they touch a plant that has been treated with a pesticide. Most contact is with the skin, but pesticides can enter the body through the eyes, nose and mouth, as well. Other ways to encounter pesticides would be by touching equipment that was used to apply a pesticide, or using water that has been used for irrigation and that has pesticides in it. If a worker is in an area near a person applying a pesticide, they may come into contact with the pesticide as it drifts, or even through direct contact with a spray."

*Training Components Covered:*

- From APPENDIX A: Worker 4c., 4f., 4e.
- From APPENDIX B: Handler 4c., 4f., 4e., 6 (same as the worker citations)

**Updates to TTT materials complying with 1992 WPS requirements** - An existing program designed to prepare trainers to deliver content from the 1992 rule can be submitted with an updated section that addresses the training administration requirements of the 2015 revisions. The program must meet the requirements under "Requirements for administering worker or handler training" outlined in this document. Certain training elements were changed in the revisions and must be addressed in the update as they are presented in the 2015 rule.

### 2. To whom do I send my TTT program information?

All submissions should be sent electronically by email to:

- Kathy Davis, at [davis.kathy@epa.gov](mailto:davis.kathy@epa.gov) and
- Jeanne Kasai at [kasai.jeanne@epa.gov](mailto:kasai.jeanne@epa.gov) and
- EPA Regional WPS Coordinator, listed in Appendix C.

### **3. What are the minimum requirements for a TTT program?**

The following listed components will satisfy the minimum requirements for a program under the 2015 revised WPS rule.

**Training content** - The materials should provide instruction on providing training that covers the worker training content (170.401(c)(3)(i)-(xxiii)) and/or handler training content (170.501(c)(3)(i) – (xiv)) required by the new rule as published on November 2, 2015. Please refer to Appendices A and B for listings of the training points.

**Requirements for administering worker or handler training** - The materials should inform the trainers to present the training as follows to the worker (40 CFR 170.401(c)(1)) and/or handler (40 CFR 170.501(c)(1)) so that the training will meet the WPS requirements:

- Training must be provided either orally from written materials or audio-visually.
- Training must be provided in a manner the worker or handler can understand.

The following training administration requirements apply starting January 2, 2017:

- The training location must be reasonably free from distractions and be conducive to training.
- Training materials for workers or handlers must be approved by EPA.
- Training for workers may be conducted only by certified applicators, state-, tribal-, or EPA-designated trainers of applicators, handlers or workers, or persons who have completed a TTT program. Training for handlers may be conducted only by certified applicators, state-, tribal-, or EPA-designated trainers of certified applicators or handlers, or persons who have completed a program. State law or tribal ordinance may supersede these requirements and may require trainers to complete a state- or tribal-specific program.
- The TTT program used to qualify as a trainer of worker or handlers must be EPA approved.
- Training must be provided annually. Handlers or workers who have not been trained within the last 12 months must receive pesticide safety training.
- Workers must be trained before they enter an area that has been treated with a pesticide or where an REI has been in effect within the last 30 days. Handlers must be trained before they perform any handling task.
- A qualified trainer must be present during the training session to respond to any questions.
- Employers are responsible for maintaining records of worker and handler training. The record must include:
  - The trained handler's or worker's printed name and signature.
  - Date of the training.
  - Information identifying which EPA-approved training materials were used.
  - Trainer's name and qualification to train (e.g., certified applicator license number, TTT course information).
  - Worker or handler employer's name.
- Employers must provide a copy of the training record to each worker or handler upon his or her request.

### **4. Are there other elements that should be included in a TTT program?**

Additional elements recommended but not required include:

- TTT courses updated with new information and refreshing trainers' skills are important to maintain trainers' skills and knowledge and improve the quality of the trainings.

- Issue documentation to qualified trainers. EPA recommends that the Train-the-Trainer provider also keep records of trainers qualified through their training programs.
- Provide an emphasis on training techniques for adult audiences.
- Provide an emphasis on providing information to low-literacy audiences.
- Include information about how to recognize and respond to cultural differences or sensitivities
- Incorporate state and local requirements and information into the training.
- Describe how to schedule trainings for farmworkers and handlers.
- Include pre- and post-training evaluation of the training to assess knowledge gained and for course improvement.

**5. *Can I continue to train using my existing state-approved or state-developed TTT materials until they are updated to satisfy the 2015 WPS rule content?***

Yes. Until January 2, 2018, the TTT program is not required to cover the updated training content in the 2015 rule. An existing state- or tribal-approved TTT program can be used to train trainers, but those trainers can provide training on the old content only until the new training content is required on January 2, 2018.

The existing training program must cover all the worker and/or handler training points from the 1992 rule, which can be found in the revised rule under 40 CFR 170.401(c)(2) for workers and 40 CFR 170.501(c)(2) for handlers. However, the manner and administration of the training must be updated to meet the 2015 requirements outlined above in section #3, “minimum requirements for a TTT program” and “requirements for administering worker or handler training”.

**6. *What is the process for obtaining approval to use existing state- or tribal-developed or state- or tribal-approved TTT programs until the new requirements must be in place?***

An existing program designed to prepare trainers to deliver content from the 1992 rule can be submitted with an updated section that addresses the training administration requirements of the 2015 revisions. The program must meet the requirements outlined in this document under “**Requirements for administering worker or handler training.**” Certain training elements were changed in the revisions and must be addressed in the update as they are presented in the 2015 rule

The email submission to EPA seeking approval of an existing state- or tribal-developed TTT program should include:

- submitter’s name, state affiliation, email and physical address, telephone number;
- whether the program covers workers and/or handlers;
- updated section that addresses the 2015 requirements for administering worker or handler training; and
- materials that will be used in the program.

The expiration date for the approval for these programs is January 1, 2018.

The EPA staff will promptly notify the submitter by email of EPA’s receipt and decision on its approval. Upon approval, an EPA approval number, as described above, will be provided, authorizing the train-the-trainer program to add the following statement to the approved training materials: “EPA has approved this interim Train-the-Trainer program as meeting the requirements of the WPS (40 CFR 170) for training (worker and/or handler) trainers. The approval number is EPA Interim Train-the-Trainer XX.”

**7. *How will EPA determine if the TTT program is acceptable?***

The EPA HQ staff and the relevant Regional staff will jointly review the program. If deficiencies are identified, EPA will communicate with the submitter to address deficiencies. A program will be determined to be acceptable if it meets the minimum criteria identified above. EPA will promptly notify the requester, by email, of EPA’s final decision on the material.

EPA approval of a program does not address any state or tribal specific requirements for a program. The provider is responsible for ensuring that programs also meet the requirements of states or tribes with laws, regulations and/or ordinances that address pesticide safety. Some states and tribes may require state or tribal approval of the program prior to its use in the jurisdiction.

**8. *How will EPA keep track of approved TTT programs? Will EPA require a statement on the materials to show that it is approved?***

EPA will assign a unique tracking number to each program and will record the submitter name and contact information. Upon EPA's approval of the program, EPA will email the approval, including the unique tracking number, to the requester. The assigned tracking number should be included on the final program materials with the following language: "EPA has approved this Train-the-Trainer program. It meets the requirements of the WPS (40 CFR 170) for training (worker and/or handler) trainers. The approval number is EPA Train-the-Trainer XX."

## APPENDIX A: Worker Pesticide Safety Training Topics

Please use the reference numbers (and where appropriate, sub-letters) in the text of the TTT materials to indicate where each point is covered. EPA will use the last two columns to review the TTT material.

Citation to reference	Worker Training topic	Check if in text	Cross reference to location of information in document (e.g., line number, page number, topic heading)
1.a.	The responsibility of agricultural employers to provide workers and handlers with information and protections designed to reduce work-related pesticide exposures and illnesses. This includes ensuring workers and handlers have been trained on pesticide safety,		
1.b.	That the employer must provide pesticide safety and application and hazard information,		
1.c.	decontamination supplies and		
1.d.	emergency medical assistance,		
1.e.	notification to workers of restrictions during applications,		
1.f.	notification to workers of restrictions to treated areas,		
1.g.	and that a worker may designate a representative to request, on their behalf, pesticide application and hazard information		
2.	How to recognize and understand the meaning of the posted warning signs used for notifying workers of restrictions on entering pesticide treated areas on the establishment.		
3.	How to follow directions and/or signs about keeping out of pesticide treated areas subject to a restricted-entry interval and application exclusion zones.		
4.a.	Where and in what forms pesticides may be encountered during work activities, and potential sources of pesticide exposure on the agricultural establishment. This includes exposure to pesticide residues that may be on or in plants,		
4.b.	on or in soil,		
4.c.	tractors, application and chemigation equipment,		
4.d.	used Personal Protective Equipment (PPE),		
4.e.	and that pesticides may drift through the air from nearby applications, or		
4.f.	Be in irrigation water.		
5.a.	Potential hazards from toxicity and exposure that pesticides present to workers and their families, including acute effects,		
5.b.	chronic effects,		
5.c.	delayed effects, and		
5.d.	Sensitization.		
6.	Routes through which pesticides can enter the body (e.g., dermal, eye, nose, oral)		

7.	Signs and symptoms of common types of pesticide poisoning		
8.	Emergency first aid for pesticide injuries or poisonings		
9.a.	Routine and emergency decontamination procedures, including emergency eye flushing techniques, and		
9.b.	if pesticides are spilled or sprayed on the body to use decontamination supplies to wash immediately or rinse off in the nearest clean water including streams, springs, lakes, or other sources if they are more readily available than decontamination supplies,		
9.c.	and as soon as possible, follow up with wash or shower with soap and water, shampoo hair, and change into clean clothes		
10.	How and when to get emergency medical care		
11.a.	When working in pesticide treated areas, wear work clothing that protects the body from pesticide residues and		
11.b.	Wash hands before eating, drinking, using the toilet, or using chewing gum or tobacco.		
12.a.	As soon as possible after working in pesticide-treated areas, wash or shower with soap and water, shampoo hair,		
12.b.	and change into clean clothes		
13.	There are potential hazards from pesticide residues on clothing		
14.a.	Wash work clothes before wearing them again and		
14.b.	wash them separately from other laundry		
15.	Do not take pesticides or pesticide containers used at work home with you		
16.	Safety Data Sheets (SDS) provide information about hazards, emergency medical treatment and other information about pesticides that are used on the establishment		
17.a.	The employer must display SDS for all pesticides used on the establishment that you may come in contact with,		
17.b.	he must tell workers and handlers where the SDS are located, and		
17.c.	Allow workers and handlers access to the SDS during normal working hours.		
18.	Agricultural employers are prohibited by the rule from allowing or directing a worker to mix/load/or apply pesticides or assist in their application unless trained as a handler		
19a.	Agricultural employers must provide specific information to early-entry workers before directing		

	them to perform early-entry activities		
19.b.	Early-entry workers must be 18 years of age or older.		
20.	There are hazards to children and pregnant women from pesticide exposure.		
21.	Keep children and nonworking family away from pesticide-treated areas.		
22.a.	After working in pesticide-treated areas, remove boots or shoes before entering your home and		
22.b.	remove work clothes and wash or shower before physical contact with children or family members		
23.	How to report suspected use violations to the State or Tribal agency responsible for pesticide enforcement		
24.	Agricultural employers are prohibited from intimidating, threatening, coercing or discriminating against any worker or handler for complying with or attempting to comply with the requirements of this rule, or because the worker or handler provided, caused to be provided, or is about to provide information to the employer or the EPA or its agents regarding conduct that the employee reasonably believes violates this part, and/or made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing concerning compliance with this rule.		



## APPENDIX B: Handler Pesticide Safety Training Topics

Please use the reference numbers below to reference in the text of the submitted TTT materials indicate where each point is covered. See Appendix a (Worker Pesticide Safety Training Topics) for citations to numbers 1-24. To the specific handler training points. EPA will use the last two columns to review the TTT material.

Citation to reference	Handler Training topic	Check if in text	Cross reference to location of information in document (e.g., line number, page number, topic heading)
1-24.	Refer to citations 1. To 24. from worker training topics		
25.	Information on proper application and use of pesticides.		
26.	Handlers must follow the portions of the labeling applicable to the safe use of the pesticide.		
27.	Format and meaning of information contained on pesticide labels and in labeling applicable to the safe use of the pesticide.		
28.	Need for and appropriate use and removal of all personal protective equipment.		
29.	How to recognize, prevent, and provide first aid treatment for heat-related illness.		
30.	Safety requirements for handling, transporting, storing, and disposing of pesticides, including general procedures for spill cleanup		
31.	Environmental concerns, such as drift, runoff, and wildlife hazards.		
32.	Handlers must not apply pesticides in a manner that results in contact with workers or other persons.		
33.a.	The responsibility of handler employers to provide handlers with information and protections designed to reduce work-related pesticide exposures and illnesses. This includes providing, cleaning, maintaining, storing, and ensuring proper use of all required personal protective equipment,		
33.b.	providing decontamination supplies; and		
33.c.	Providing specific information about pesticide use and labeling information.		
34.	Handlers must suspend a pesticide application if workers or other persons are in the application exclusion zone.		
35.	Handlers must be at least 18 years old.		
36.a.	The responsibility of handler employers to ensure handlers have received respirator fit-testing,		
36.b.	medical evaluation, and		
36.c.	Respirator training, if a respirator is required by the product labeling.		
37.	The responsibility of agricultural employers to post treated areas as required by this rule.		

## **APPENDIX C: Regional WPS Coordinators**

### **Region 1:**

Andrea Szylvian email: [Szylvian.Andrea@epa.gov](mailto:Szylvian.Andrea@epa.gov)

Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont

**Region 2:** Tara Glynn email: [Glynn.Tara@epa.gov](mailto:Glynn.Tara@epa.gov)

New Jersey, New York, Puerto Rico, US Virgin Islands

**Region 3:** Magda Rodriguez-Hunt email: [Rodriguez-Hunt.Magda@epa.gov](mailto:Rodriguez-Hunt.Magda@epa.gov)

Delaware, Maryland, Pennsylvania, Virginia, Washington DC, West Virginia

**Region 4:** Randy Dominy email: [Dominy.Randy@epa.gov](mailto:Dominy.Randy@epa.gov)

Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee

**Region 5:** Donald Baumgartner email: [Baumgartner.Donald@epa.gov](mailto:Baumgartner.Donald@epa.gov)

Illinois, Indiana, Ohio, Michigan, Minnesota, Wisconsin

**Region 6:** Gregory Weiler email: [Weiler.Gregory@epa.gov](mailto:Weiler.Gregory@epa.gov)

Arkansas, Louisiana, New Mexico, Oklahoma, Texas

**Region 7:** Shawn Hackett email: [Hackett.Shawn@epa.gov](mailto:Hackett.Shawn@epa.gov)

Iowa, Kansas, Missouri, Nebraska

**Region 8:** Suzanne Stevenson email: [Stevenson.Suzanne@epa.gov](mailto:Stevenson.Suzanne@epa.gov)

Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming

**Region 9:** Katy Wilcoxon email: [Wilcoxon.Katy@epa.gov](mailto:Wilcoxon.Katy@epa.gov)

Arizona, California, Hawaii, Nevada

**Region 10:** Derrick Terada email: [Terada.Derrick@epa.gov](mailto:Terada.Derrick@epa.gov)

Alaska, Idaho, Oregon, Washington