

# **Model Renovation, Repair and Painting (RRP) Rule E-learning Course Component Implementation Requirements**

## **How do I use this document?**

This document describes the necessary requirements for the implementation of the EPA electronic learning (E-learning) modules for the renovator and the lead dust sampling technician trainings for certification. The electronic training materials replace the in-class lecture portion of the courses. They do not replace the in-person training activities (minimum 2 hours for initial courses) where required, or the final tests. Although the E-learning course modules do contain a test this test does not provide certification. In order to become certified, students who take the E-learning course that includes hands-on learning must still attend the required in-person training activities (minimum 2 hours for initial courses) and demonstrate the required skills during the hands-on skills assessment as well as pass the final exam in person. Students have the option to take the entire renovator refresher course online with no hands-on requirement or in-person test. Students may take the renovator refresher without hands-on learning every other time they get recertified. Renovators who take the online refresher training without hands-on will be certified for three years. Renovators who take the refresher with hands-on training will be certified for five years. If a training provider chooses to create an alternative E-learning curriculum and not use the EPA's model course curriculum, they will need to ensure that they cover all the material contained in the model E-learning modules as well as the model course implementation requirements in this document.

## **Area 1: Registration**

Providers of Renovation, Repair and Painting (RRP) Rule E-learning course components will need to obtain identifying information from each student upon enrollment including name, address, telephone number and email address. For refresher courses, providers must obtain a copy of each trainee's course completion certificate showing that each trainee was eligible to take the refresher course. Uses of this information include (1) verifying with reasonable certainty the identity of the student completing the E-learning course as the person who enrolled with the provider, (2) generating and printing an E-learning course completion certificate to be given to the provider to authorize participation in the required in person training activities (minimum 2 hours for initial courses) and the in-person hands-on skills assessment and (3) maintaining a database of those who have successfully completed the E-learning portion of the course.

The provider should assign a unique identifier to the student that they will use to launch and relaunch the course. Using this identifier, the provider should track each of the student's log-ins, launches, progress, and completion by this identifier. (Most learning management systems commonly refer to this as launching, tracking or bookmarking, and completion status. See Areas 3, 6, and 7 for more detail.)

## **Area 2: E-learning Content**

As with the in-person training courses, the course manuals that EPA has developed and made available on its website (<http://www.epa.gov/lead/pubs/renovation.htm>) must serve as the basis for the training courses required to support the RRP Rule. Training providers may customize the course to include information on relevant state and local regulations; however, when reviewing draft courses submitted for review EPA will consider the posted model E-learning course component which includes these implementation requirements as the baseline, required material.

At a minimum, the E-learning component of the course must be sufficient to meet the 43 objectives specified in Appendix A for the initial Renovator course, the 35 objectives specified in Appendix B for the renovator refresher course and the 22 objectives specified in Appendix C for the LDST course.

### **Area 3: Tracking Progress**

The E-learning component of the course must allow students to stop and restart the course at the last page they viewed, so that they do not have to complete the entire course in a single session. Thus, the application must track (or “bookmark”) progress and have the ability to restart at the place in the course where a student left off. The course must require students to answer the knowledge check questions before they can complete each chapter or section of the training. For instance, in the model course the student must make a selection and click “submit” for each of the knowledge checks in order to complete the chapter. The course must also require students to complete every section of the course before being allowed to take the final assessment. Specifically, the student must view every screen and answer every knowledge check question for every chapter before being allowed to access the final assessment.

### **Area 4: Assessments**

E-learning components of the courses must include interim knowledge checks within each module. Interim knowledge checks will consist of at least two to three questions to review course content and provide feedback if the student does not respond correctly.

Following a student’s completion of all modules of the E-learning course component, the courseware should present an assessment of at least 20 questions that evaluates a student’s understanding of the full range of course material. The E-learning course final assessment questions must be different from the final exam questions presented to students following the in person hands-on skills assessment.

In order to successfully complete the E-learning component of the certification course, students must answer at least 80% of the final E-learning assessment questions correctly. If a student answers 80% or more questions correctly, the application should take the student to the set of course completion screens.

If a student answers less than 80% of the questions correctly, the student should be told how many questions were answered correctly and the student must be required to review the material again. The course should follow the procedures below:

- Before retaking the assessment, direct the student back to the Table of Contents and instruct them to review the course material.
- The course modules will be marked INCOMPLETE, and the student must fully complete these modules again before retaking the final assessment.
- The application should present a different set of questions when a student is retaking an assessment. The student should only be required to re-take questions from sections for which they did not answer correctly, students do not need to be tested on the entire set of material but only the material for questions they did not answer correctly. The student must retake the exam until they have achieved a combined score of 80%. For instance, if they get 9 questions wrong out of 20 on the first attempt, they only need to answer 5 of the 9 questions correctly on the second attempt in order to demonstrate mastery of the material. The student should be allowed as many attempts as necessary to achieve a score of 80%.

The E-learning application should contain at least three different versions of a final assessment, or be able to randomly assemble the final assessment by drawing from a bank of at least 60 relevant questions. If a training provider chooses to create an alternative E-learning curriculum, the final exam should include questions on the following topics. For Chapters 1, 3, 4, and 7, two questions per Chapter. For Chapters 2, 5, 6, 8, three questions per Chapter. Each question is worth 1 point for a total of no less than 20 points.

#### **Area 5: Student Questions Regarding E-learning Materials**

The training provider must provide a means for students to pose and receive answers to questions through at least one of two options. The first option is a Frequently Asked Questions page within the provider's website. The second option is the ability to submit questions to an e-mail address monitored by the training provider. For the second option, students must receive a timely response within less than 24 hours during the work week and by close of business on Monday for questions received over a weekend. The provider should anticipate questions pertaining to both the course content and the functionality of the courseware and provide answers to frequently asked questions to users via email or on their website.

#### **Area 6: E-learning Completion Activities**

If a student answers 80% or more of the questions correctly, the application must generate a certificate containing the following information, at a minimum:

- Student's unique identifier
- E-learning course completion certificate date,
- Student's name, and
- E-learning course provider.

Students must have the option to both print and save an un-editable copy of the certificate of completion.

For the E-learning refresher course that does not include hands-on learning, the training provider must incorporate a 25 question final course test after the student completes the above final E-learning assessment questions. Training providers may use questions from EPA's model exam which EPA will provide upon request. A course completion certification must be issued after the student passes the final course test. The course completion certificate must include a student photograph. For more information on the requirements for final course completion certificates, see the [instructions](#) for accredited training providers. For this type of course, pre-training notifications are not required and post-training notifications must be submitted via the Central Data Exchange no later than the 10<sup>th</sup> day of the month and include all students trained in the previous month.

### **Area 7: Student Tracking and Verification**

Students who choose to complete the E-learning modules will need to successfully pass the E-learning module final assessment, attend the required in-person training activities (except for the renovator refresher taught without hands-on learning) (minimum 2 hours for initial courses), complete the in-person hands-on skills assessment and the in-person final course exam (identical to the exam for those who took an in-class lecture) in order to receive certification. The training organization will be required to comply with the pre and post notification requirements using the location of the facility used for the in-person portion of the training. Successfully passing the final assessment for the E-learning course component will constitute completion of the E-learning modules but not the entire course for courses that include hands-on learning. In order to attend the required in-person training activities (minimum 2 hours for initial courses) and to take the in-person hands-on skills assessment and final exam, a student will need to provide proof of this completion in the form of the certificate. Additionally, an accredited training provider must verify a student's E-learning course completion through their systems or internal processes before allowing the student to attend the required in-person training activities (minimum 2 hours for initial courses) and complete the in-person hands-on skills assessment and final exam.

**Appendix A**  
**Initial Renovator Training Course Objectives**

## **Course Objectives – Renovator Initial**

### Module 1 – Lead Based Paint Information

1. Define “lead-based paint” in accordance with Federal standards.
2. Describe the health risks to children and adults associated with lead.
3. List the reasons lead-contaminated dust poses health risks to children and adults.

### Module 2 – Regulations

1. Identify the differences between lead abatement activities and lead renovation, repair and painting.
2. Define “Target Housing” as specified by the RRP Rule.
3. Define “Child Occupied Facility” as specified by the RRP Rule.
4. Identify activities covered/excluded under the RRP Rule.
5. Indicate when an owner can opt out of RRP Rule.
6. List a firm’s responsibilities as a “Certified Renovator” including recordkeeping requirements.
7. List the responsibilities of an individual “Certified Renovator”.
8. State the civil penalties for violation of the RRP Rule.
9. Recognize when the HUD Lead Safe Housing Rule is in effect.
10. Explain differences between the RRP Rule and the HUD LSH rule.

### Module 3 – Before Beginning Work

1. Define the requirements for distribution of the Renovate Right pamphlet under the Pre-Renovation Education (PRE) rule.
2. Indicate the recordkeeping requirements of the PRE rule.
3. Explain that many pre-1978 homes contain lead, especially those built before 1960.
4. Identify the choices available for pre-work lead testing by Certified Renovators.
5. State the requirement to report lead test kits result to clients within 30 days of use.

### Module 4 – Containing Dust

1. List the benefits of “Containment”.
2. Explain containment requirements for interior renovations including covering of floors and furniture, closing and sealing doors and vents, and posting signs.
3. Explain containment requirements for exterior renovations including covering the ground, closing doors and windows, and preventing migration of dust.

### Module 5 – During the Work

1. List work practices that are prohibited under the RRP Rule because they create dangerous amounts of dust and paint chips.
2. Describe good practices to use to control dust, debris or paint chips during work.
3. Indicate that power tools used when lead paint is present must have HEPA-filtered attachments.
4. Relate how workers should protect themselves when working with lead paint.
5. Cite how to prevent the spread of lead dust from a work site.

### Module 6 – Cleaning

1. Discuss aspects of effective cleanup on the job.

2. Restate interior cleaning requirements including use of HEPA vacuums and two-bucket mopping method and misting of plastic sheeting before removal.
3. Restate exterior cleaning requirements including misting of plastic sheeting and collecting visible paint chips and debris.
4. Describe the Cleaning Verification Procedure.
5. Define clearance testing and when it is required.
6. Identify methods for waste cleanup and disposal.

Module 7 – Recordkeeping

1. Cite the requirement for renovation firms to retain renovation records for 3 years following completion of work.
2. List which records have to be maintained onsite (firm and renovator certifications, pre-renovation education confirmation, opt-out certification, etc.).
3. Describe use of confirmations for pre-renovation education information.
4. List the types of records that must be maintained by the renovation firm to document the renovation.
5. Explain the requirements for Post-Renovation Reporting.

Module 8 – Training Non-certified Workers

1. Describe the roles and responsibilities of the Certified Renovator with regard to training Non-Certified Renovation Workers and ensuring compliance with RRP program requirements.
2. Describe the roles and responsibilities of the Trained Non-Certified Renovation Worker.
3. Cite the “Steps” guide as a resource for training non-certified renovation workers.
4. Explain the “steps” to Lead Safe Renovation, Repair and Painting that should be covered in training Non-Certified Renovation Workers.
5. Cite the documentation requirements regarding training of Non-Certified Renovation Workers.

<b>Total Objectives:</b>	
<b>Module</b>	<b># of Objectives</b>
Module 1	3
Module 2	10
Module 3	5
Module 4	3
Module 5	5
Module 6	6
Module 7	5
Module 8	5
Total	42

**Appendix B**  
**Refresher Renovator Training Course**  
**Objectives**

## **Course Objectives – Renovator Refresher**

### Module 1 – Regulations

1. Identify the differences between lead abatement activities and lead renovation, repair and painting.
2. Define “Target Housing” as specified by the RRP Rule.
3. Define “Child Occupied Facility” as specified by the RRP Rule.
4. Identify activities covered/excluded under the RRP Rule.
5. Indicate when an owner can opt out of RRP Rule.
6. List a firm’s responsibilities as a “Certified Renovator” including recordkeeping requirements.
7. List the responsibilities of an individual “Certified Renovator”.
8. State the civil penalties for violation of the RRP Rule.
9. Recognize when the HUD Lead Safe Housing Rule is in effect.
10. Explain differences between the RRP Rule and the HUD LSH rule.

### Module 2: Testing for Lead-based Paint 35 minutes

1. Describe requirements for testing for Lead-based paint with EPA-Recognized Test Kits and paint chip samples.

### Module 3: Review of Setup Practices 20 minutes

1. List the benefits of “Containment”.
2. Explain containment requirements for interior renovations including covering of floors and furniture, closing and sealing doors and vents, and posting signs.
3. Explain containment requirements for exterior renovations including covering the ground, closing doors and windows, and preventing migration of dust.

### Module 4: Review of Prohibited Practices, Personal Protective Equipment and Dust Control

1. List work practices that are prohibited under the RRP Rule because they create dangerous amounts of dust and paint chips.
2. Describe good practices to use to control dust, debris or paint chips during work.
3. Indicate that power tools used when lead paint is present must have HEPA-filtered attachments.
4. Relate how workers should protect themselves when working with lead paint.
5. Cite how to prevent the spread of lead dust from a work site.

### Module 5: Cleaning Activities and Checking Your Work

1. Discuss aspects of effective cleanup on the job.
2. Restate interior cleaning requirements including use of HEPA vacuums and two-bucket mopping method and misting of plastic sheeting before removal.

3. Restate exterior cleaning requirements including misting of plastic sheeting and collecting visible paint chips and debris.
4. Describe the Cleaning Verification Procedure.
5. Define clearance testing and when it is required.
6. Identify methods for waste cleanup and disposal.

Module 6: Recordkeeping

1. Cite the requirement for renovation firms to retain renovation records for 3 years following completion of work.
2. List which records have to be maintained onsite (firm and renovator certifications, pre-renovation education confirmation, opt-out certification, etc.).
3. Describe use of confirmations for pre-renovation education information.
4. List the types of records that must be maintained by the renovation firm to document the renovation.
5. Explain the requirements for Post-Renovation Reporting.

Module 7: Training Non-Certified Renovators

1. Describe the roles and responsibilities of the Certified Renovator with regard to training Non-Certified Renovation Workers and ensuring compliance with RRP program requirements.
2. Describe the roles and responsibilities of the Trained Non-Certified Renovation Worker.
3. Cite the “Steps” guide as a resource for training non-certified renovation workers.
4. Explain the “steps” to Lead Safe Renovation, Repair and Painting that should be covered in training Non-Certified Renovation Workers.
5. Cite the documentation requirements regarding training of Non-Certified Renovation Workers.

<b>Total Objectives:</b>	
<b>Module</b>	<b># of Objectives</b>
Module 1	10
Module 2	1
Module 3	3
Module 4	5
Module 5	6
Module 6	5
Module 7	5
Total	35

**Appendix C**  
**Lead Dust Sampling Technician Training**  
**Course Objectives**

# Course Objectives – Lead Dust Sampling Technician

## Chapter 1 – Introduction

1. Define the role of a LDST and the scope of the profession.
2. Recognize the difference between an LDST and Paint Inspector and Risk Assessor
3. Describe the EPA RRP rule and its application to LDST
4. List the health risks of lead.
5. Define the HUD Lead Safe Housing Rule.

## Chapter 2 – Visual Inspection

1. Describe a visual inspection.
2. List the steps for performing a visual inspection under both EPA's and HUD's regulations.
3. Identify when to look for deteriorated paint, visible dust or debris, and paint chips.
4. Describe how to record results on a visual inspection form.
5. Recognize when there is a need, if any, to do an exterior inspection.
6. Recognize how to identify deteriorated paint, visible dust or debris, and paint chips.

## Chapter 3 – Lead Dust Wipe Sampling

1. Indicate why collecting a sample is necessary and what it measures.
2. Describe when and where to take a dust wipe sample.
3. Describe how to take a dust wipe sample.
4. List the supplies needed to take a dust wipe sample.
5. Indicate how to sample three surfaces where dust is collected.
6. Recognize the common mistakes that can give incorrect results.
7. Relate the difference between single-surface and composite sampling.

## Chapter 4 – Selecting a Laboratory and Interpreting Results

1. Define how to select an EPA-recognized lab and explain why proper selection is important.
2. List the steps to ensure samples are not tampered with or lost while maintaining a chain of custody.
3. Describe how to review and interpret lab results.

## Chapter 5 – Writing and Delivering the Report

1. List the six elements that make up a complete lead dust clearance test report.

## Chapter 6 – Putting the Skills Together

Consists of practice exercises that re-enforce the objectives already presented. Objectives in this chapter are performance based, not knowledge based.

<b>Total Objectives</b>	
<b>Module</b>	<b># of Objectives</b>
Module 1	5
Module 2	6
Module 3	7
Module 4	3
Module 5	1
Module 6	0
Total	22