



Response to Issues Raised
During Public Comment
on
April 2006 Draft Specifications
for WaterSense Labeling of
Certification Programs for
Irrigation Professionals

October 20, 2006

Background

This document provides EPA's response to public comments received on the draft specifications issued April 6, 2006, for the WaterSense Labeling of Certification Programs for Irrigation Professionals. These comments can also be viewed online at http://www.epa.gov/watersense/docs/certification_comments508.pdf.

Table of Contents

| Issue | Page |
|---------------------------------------|------|
| General Program | 4 |
| Independent Oversight Committee | 6 |
| Experiential Requirements..... | 6 |
| Exam Requirements | 7 |
| Renewal Requirements..... | 11 |

I. Comments on the General Program

- a. Multiple commenters recommended that WaterSense specify attributes for certifying organizations pertaining to their financial stability, years of incorporation, and mission of their organization. Opposing commenters raised concern about creating unnecessary barriers to entry.

Response: WaterSense agrees that organizations should have a reputation of good business practices and have a demonstrated ability to operate a certification program that promotes water efficiency. To address this issue, WaterSense has requested two letters of reference as part of the application for use of the label (see Section 3.7 on all specifications). Beyond requiring the letters of reference, WaterSense believes additional requirements related to financial position or years of incorporation would create unnecessary barriers to entry, particularly to small or emerging organizations that promote water-efficient irrigation practices. In response to limiting the type of organizations that can offer certifications, WaterSense concluded that if a certification program, regardless of the organization's overall mission, meets the criteria in the specification, then the program will help promote water efficiency and should be eligible to be WaterSense labeled.

- b. Multiple commenters requested that a surveillance and removal mechanism be in place through which certifications are revoked from professionals with poor irrigation practices.

Response: Under these specifications, WaterSense is labeling programs that certify the knowledge of irrigation professionals. If these certified professionals want to partner with WaterSense and use the WaterSense partner logo, they will be required to sign a WaterSense Partnership Agreement and abide by WaterSense Program Guidelines. The Program Guidelines provide a dispute resolution process and mechanism for terminating the Partnership Agreement if the partner is not meeting their requirements under the program.

- c. Commenters recommended that WaterSense or the certifying organization house an online database of certified professionals.

Response: The certifying organization will be responsible for housing an online database of its certified professionals. The WaterSense program will list those certified professionals who sign up as WaterSense Partners.

- d. Commenters recommended that WaterSense review labeled certification programs every five years to ensure that programs continue to meet WaterSense specifications.

Response: WaterSense added Section 5.0 "WaterSense Renewal Process for the Labeling of Certification Programs" to each specification, requiring certifying organizations to reapply every three years to continue to be WaterSense labeled.

- e. One commenter recommended that the certifying organization submit by-laws as part of the application process.

Response: The certifying organization must submit information consistent with Section 3 of the specification. While an organization may submit by-laws as a portion of the application, they are not required, as this unnecessarily limits the type of organization that may apply for the label. Other forms of documentation are acceptable, as long as the applicant organization demonstrates that the requirements of the specification are met.

- f. Commenters recommended separating the Irrigation System Installation and Maintenance Specification.

Response: WaterSense did not divide this specification. Through an additional discussion with the commenter, we determined that the root of the comment was to recommend the creation of a technician level specification. WaterSense will consider a specification applicable to a certification of this level in the future.

- g. Multiple commenters voiced the need for WaterSense specifications for other types of certifications, namely a lower level irrigation technician and a higher level site water manager.

Response: Current research is underway on other types of certifications pertaining to landscape water use. Additional WaterSense specifications are anticipated in the future to make labeling available for these types of certification programs.

- h. One commenter asked what the certifying organization's responsibility to WaterSense is after receiving the label.

Response: These responsibilities and other requirements are outlined in the WaterSense Partnership Agreement, the Program Guidelines, and the label and partner logo use guidelines documents.

- i. Multiple commenters recommended that WaterSense label the irrigation system itself.

Response: WaterSense agrees that rating or qualifying systems can be an effective approach and will consider how it can be implemented under the WaterSense program. Labeling the certification of irrigation professionals is the first step in a series of initiatives to recognize and promote water-efficient practices, products, and programs.

- j. One commenter noted that a market analysis of the irrigation certification industry was not released with the specifications.

Response: WaterSense researched and evaluated the range of training and certification programs available in the irrigation industry before developing the WaterSense specifications for certification of irrigation professionals. While that research was not published in a formal research report, WaterSense determined that trade associations and other irrigation industry groups have established certification programs that promote water-efficient irrigation practices. These specifications reflect the best of the practices identified. By labeling programs that meet these specifications, we will encourage other programs to adopt best practices, so they also can be recognized. The benefits achieved by WaterSense labeling include increased participation in labeled certification programs; increased consumer awareness of water-efficient irrigation practices; increased market share for certified professionals; improved irrigation system design, installation, and maintenance; and reduced water use and irrigation run-off. WaterSense appreciates the comment and intends to publish research reports in conjunction with other WaterSense specifications, as the program evolves.

II. Comments on the Independent Oversight Committee (IOC)

- a. One commenter suggested that the number of individuals on the IOC be increased to greater than three.

Response: WaterSense did not change this number. Three professionals is considered a sufficient minimum number to generate a variety of views of irrigation practice, while not creating an unnecessary barrier to small or emerging organizations.

- b. One commenter requested that the number of employees of the certifying organization allowed on the IOC be decreased to one third rather than one half.

Response: WaterSense decreased the number of employees of the certifying organization allowed on the IOC to one third to emphasize the independence of the IOC from the paid staff of the certifying organization.

III. Comments on the Experiential Requirements

- a. Several commenters recommended that WaterSense increase the experiential requirements on all three specifications. Suggestions included an apprenticeship requirement or adding a requirement that designs or descriptions of installations be submitted upon sitting for an exam.

Response: The examination requirement is designed as a test of competence and the experiential requirement is designed to confirm that the professional has a sufficient basis of working knowledge. With respect to requiring submissions of designs and other documentation, WaterSense is not aware of any certifying organizations that have the staff resources to review and pass judgment on detailed documentation submissions. Demonstrated practical work experience,

coupled with demonstrated competence through a passing score on well written examinations, provide a high degree of confidence in the capabilities of the certified individual. While certification programs can include an apprenticeship, WaterSense concluded that is not practical to require this as it is not currently being implemented in any existing program. The experiential requirement was established for each certification program at a level that would demonstrate applied skill, at a level proportional to the functions those professionals perform.

- b. One commenter stated that three years of experience for the installation and maintenance specification may deter professionals from being certified.

Response: WaterSense believes that having an experiential requirement is essential to the integrity of the certification program. After additional consideration, we do agree that one year of experience is a more appropriate requirement for this type of professional, as we expect a sufficient degree of practical working knowledge in that field can be gained in one year. The specification for installation and maintenance professionals was modified to reflect this decision.

- c. One commenter recommended that the independent oversight committee establish the experiential requirement for its respective certification program, rather than having the details of the experiential requirement be defined in the specification.

Response: The experiential requirement is an essential part of certification programs that will be labeled under WaterSense. As such, WaterSense has determined it should play an active role in defining the experiential requirements necessary for labeling, and will define such requirements in the program specifications.

IV. Comments on the Exam Requirements

- a. Multiple commenters recommended that specifications allow for a field exam requirement instead of, or in addition to, a written exam requirement.

Response: While a field exam is not a requirement for WaterSense labeling, it can be included as a component of the certification. Exam subject requirements can be fulfilled either through a field exam or a written exam. The Independent Oversight Committee can establish the most appropriate examination technique for the particular certification program.

- b. Commenters suggested the addition of specific exam topics, such as “low head drainage” and “wastewater associated with autodrain.”

Response: The exam subjects listed in Section 2.3.1 of each specification cover general topics related to water efficiency in irrigation. These are not meant to be all inclusive lists of subjects a certified individual should know. Rather, they form

a baseline for the testing of knowledge of water efficiency principles that apply to the respective irrigation discipline.

- c. Commenters expressed concern with the security of exams submitted to WaterSense by the certifying organization as part of the labeling application process.

Response: WaterSense understands this concern, but finds that it is important to have a credible, documented demonstration of material covered on the exam. Exams will be treated as confidential business information by request and returned to the certifying organization once the application is reviewed.

- d. Commenters emphasized that exam questions should be developed and understood by individuals who have experience in test writing.

Response: This concern is addressed through the quality assurance procedures described in Section 2.3.3 of each specification. A professional review of exam questions is required once every 1,000 exams or once every two years, whichever occurs first.

- e. Commenters recommend a professional review of exam material every year.

Response: In establishing the two-year review cycle, WaterSense sought to strike the appropriate balance between the time and cost burden of conducting such a review, and the pace of changes in equipment and practice in the irrigation industry. Considering these factors, WaterSense concluded that a two-year review cycle is appropriate. However, the specification has been modified to require that a review also take place after 1,000 examinations, to increase the review cycle if there is significant exposure to the exam.

- f. One commenter recommended the use of general language for protecting the integrity and security of the exam administration and exam grading processes, instead of specifying who could participate in those processes.

Response: WaterSense has concluded that specifying the types of individuals allowed to conduct exam administration and exam grading will offer the most confidence that the integrity of the exam process is maintained. Therefore, we have retained specific rather than general requirements in this regard. However, further discussions with the commenter brought to WaterSense's attention that there are professional test administrators who are not certified in the field of irrigation, but are competent in test administration and grading. The specifications have been modified to allow trained test administrators to proctor and grade exams.

- g. One commenter recommended that all exams be professionally graded.

Response: An independent academic institute, professional testing organization, a certified irrigation professional not involved in the training or proctoring of the practitioner being examined, or a professional test administrator may grade exams. WaterSense did not change this criterion to reflect the comment because it is considered an unnecessary burden that could act as an impediment to potential WaterSense partner organizations.

- h. One commenter recommended that WaterSense not specify exam subjects required for a certification, but instead leave this responsibility to the certifying organization. The commenter suggested that the exam processes be reviewed by the oversight committee to ensure the exam meets the functional requirements of the job.

Response: The list of subject areas specified in each specification in Section 2.3.1 was developed through careful consideration and consultation with interested stakeholders during the specification development process, including the public review and comment process. Therefore, we believe the subject areas as specified provide the best framework for assuring the goals of the WaterSense program are achieved. As written, the specified subject areas do cover the desired water efficiency aspects related to functional requirements for each job.

- i. Commenters requested the addition of an exam content requirement to the Auditor specification in relation to the professional's recognition of system problems and maintenance requirements.

Response: WaterSense agrees this is important subject matter and added this exam content requirement to the Auditor specification.

- j. Commenters requested the addition of an exam content requirement to the Auditor specifications in relation to the professional's knowledge of new and emerging technologies.

Response: WaterSense agrees this is important subject matter and added this exam content requirement to the Auditor specification.

- k. Commenters requested the addition of an exam content requirement to the Designer specification in relation to the professional's knowledge of available water sources when designing a project.

Response: WaterSense agrees this is important subject matter and added this exam content requirement to the Designer specification.

- I. One commenter suggested the deletion of an exam content requirement to the Designer specification in relation to the professional's knowledge of cost estimating.

Response: WaterSense agrees that cost estimating is not related to a professional's knowledge of water-efficient irrigation practices and deleted this exam content requirement from the Designer specification.

- m. One commenter suggested the deletion of an exam content requirement from the Designer specification in relation to the professional's knowledge of plumbing and electrical code. Other commenters thought it was important for professionals to be aware of these codes, but agreed it was not necessary to examine detailed knowledge of the codes.

Response: We believe these are important subject areas for effective and efficient system design. However, in view of the comments, the intent of including these subject areas has been clarified to indicate that for the purpose of WaterSense labeled certification, we expect the professionals examined to have an awareness of how these codes relate to proper design. We do not expect the certification program to demonstrate comprehensive examination of code requirements in order to be WaterSense labeled.

- n. Commenters requested the addition of an exam content requirement to the Designer and Installation and Maintenance specifications in relation to the professional's knowledge of system pressure.

Response: WaterSense agrees this is important subject matter and added this exam content requirement to the Designer and Installation and Maintenance specifications.

- o. Commenters requested the addition of an exam content requirement to the Installation and Maintenance specification in relation to the professional's knowledge of equipment commissioning.

Response: WaterSense agrees this is important subject matter and added this exam content requirement to the Installation and Maintenance specification.

- p. Commenters requested the addition of an exam content requirement to the Installation and Maintenance specification in relation to the professional's knowledge of system components.

Response: WaterSense agrees this is important subject matter and added this exam content requirement to the Installation and Maintenance specification.

V. Comments on the Renewal Requirements

- a. One commenter recommended that the term “renewal” be changed to “recertification.”

Response: We have retained the term “renewal,” which is intended to cover programs with either renewal or recertification requirements.

- b. One commenter suggested that renewal be required at least once every three years instead of every two years.

Response: The renewal requirement remains at two years due to rapid changes in the irrigation industry in relation to water efficiency. In view of the rapid pace of change, WaterSense concluded a two-year renewal frequency is more appropriate.

- c. Several commenters requested an increase in stringency to the renewal requirements to ensure a professional’s knowledge in the field stayed current.

Response: WaterSense clarified the language in Section 2.4.2 of each specification to indicate that the documentation of maintained proficiency must include evidence of the professionals’ ongoing application of water-efficient concepts in their area of certification.