



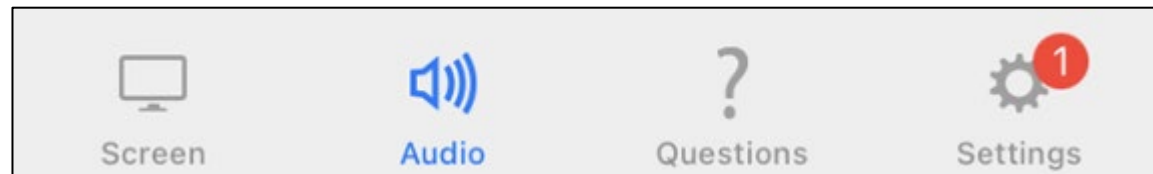
INFORMATION SESSION

Proposed Radon Credentialing Criteria

April 12, 2023
1:00-2:30 ET

Thank You for Being Here Today

- Participants using their computers to join the webcast must use the VoIP audio through their devices using the link provided in the registration confirmation email.
- Participants using their smartphones to join the webcast can use the VoIP audio or call in. To call in, select the “Audio” option at the bottom of your screen (see image below), and you will be given a call-in number to switch your audio to a phone call.



- All participants will be muted whether using VoIP or phone audio.

How to Ask Clarifying Questions

- Use the GoToWebinar “Questions” function on the right side (computer; top image) or bottom (smartphone; bottom image) of your screen to submit written questions. Staff will be monitoring incoming questions.
- Clarifying questions will be answered following the presentations as time allows.
- **Comments must be submitted through the docket:** www.regulations.gov/document/EPA-HQ-OAR-2017-0430-0030. This link may be found in the chat pane.



Information Session Objectives

- Review EPA's role in overseeing quality of radon service providers.
- Improve understanding of conformity assessment and application of voluntary consensus standards and other private sector standards within federal programs.
- Review the Proposed Radon Credentialing Criteria, including how to provide comments.
- Answer clarifying questions.

Flow for Today's Information Session

Introduction

David Rowson, Director, Indoor Environments Division, EPA



Conformity Assessment and Private Sector Standards in the U.S.

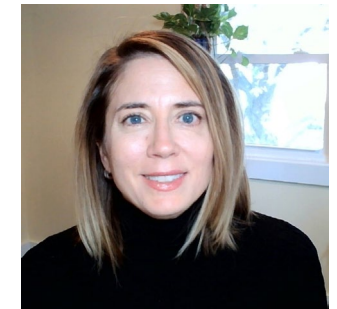
Elise Owen, Standards Executive, EPA

Dr. Roy Swift, Executive Director, Workcred



Overview of Proposed Radon Credentialing Criteria

Katrin Kral, Policy Analyst, Center for Radon and Air Toxics, EPA





INTRODUCTION

David Rowson

Director, EPA's Indoor Environments Division

EPA's Role in Establishing and Promoting Standards of Practice

- An estimated 21,000 lives are lost to lung cancer from radon every year.
- Credentialing programs help ensure that professionals have necessary knowledge, skills and abilities to test and mitigate for radon.
- EPA has statutory authority to oversee the quality of radon service providers.
 - No authority to issue regulation.
 - Reinforced by Congressional recommendations in the past 5 years.
- Current radon credentialing programs do not meet consistent standards.



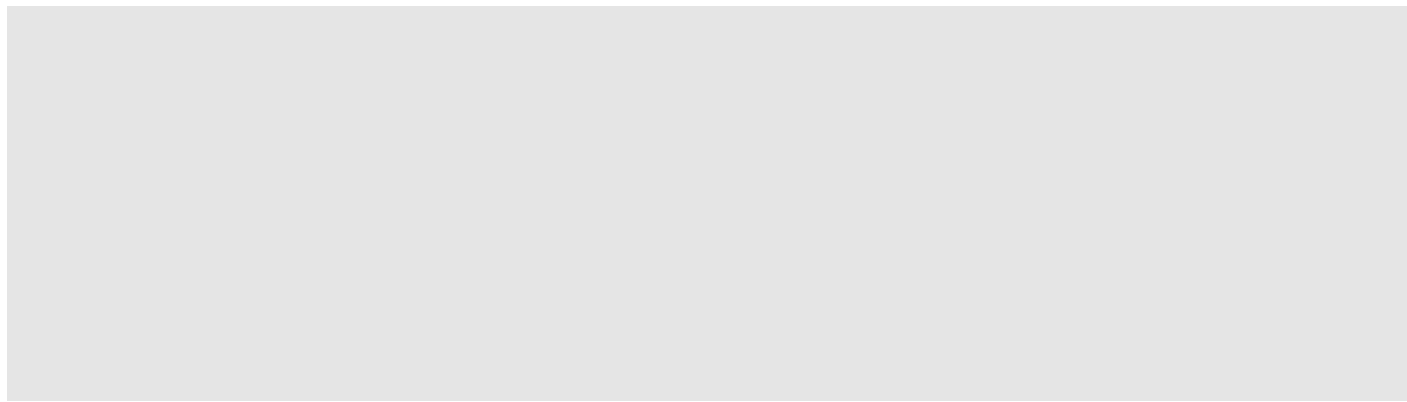


CONFORMITY ASSESSMENT AND PRIVATE SECTOR STANDARDS IN THE UNITED STATES

Elise Owen, EPA Standards Executive
Dr. Roy Swift, Executive Director, Workcred

Standards and Conformity Assessment

Elise Owen
EPA Standards Executive
owen.elise@epa.gov



Federal Law

The National Technology Transfer and Advancement Act (NTTAA) states that federal agencies and departments shall:

- Use Voluntary Consensus Standards (VCS) as a means to carry out policy objectives, except where “inconsistent with applicable law or otherwise impractical.”
- Consult with VCS bodies (within EPA we use the term “engage” to avoid confusion with other, more formal types of consultation).
- Participate in the development of VCS whenever such participation is in the public interest and is compatible with agency or departmental missions, authorities, priorities, and budgetary resources.

Also encourages coordination with private sector on conformity assessment (e.g., testing, inspection, certification)



Related policies



- **OMB Circular A-119:** Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities
- **15 CFR Part 287:** Guidance on Federal Conformity Assessment
- *Numerous other Federal laws and policies may also come into play as EPA implements the NTTAA*

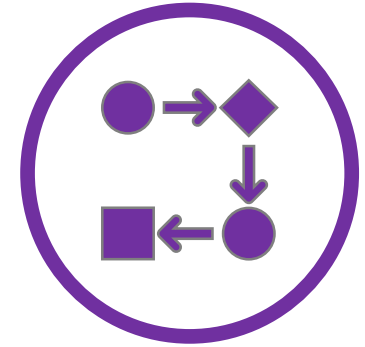
VCS development considers:



**Openness /
Transparency**



Balance



Due process



Appeals process



Consensus

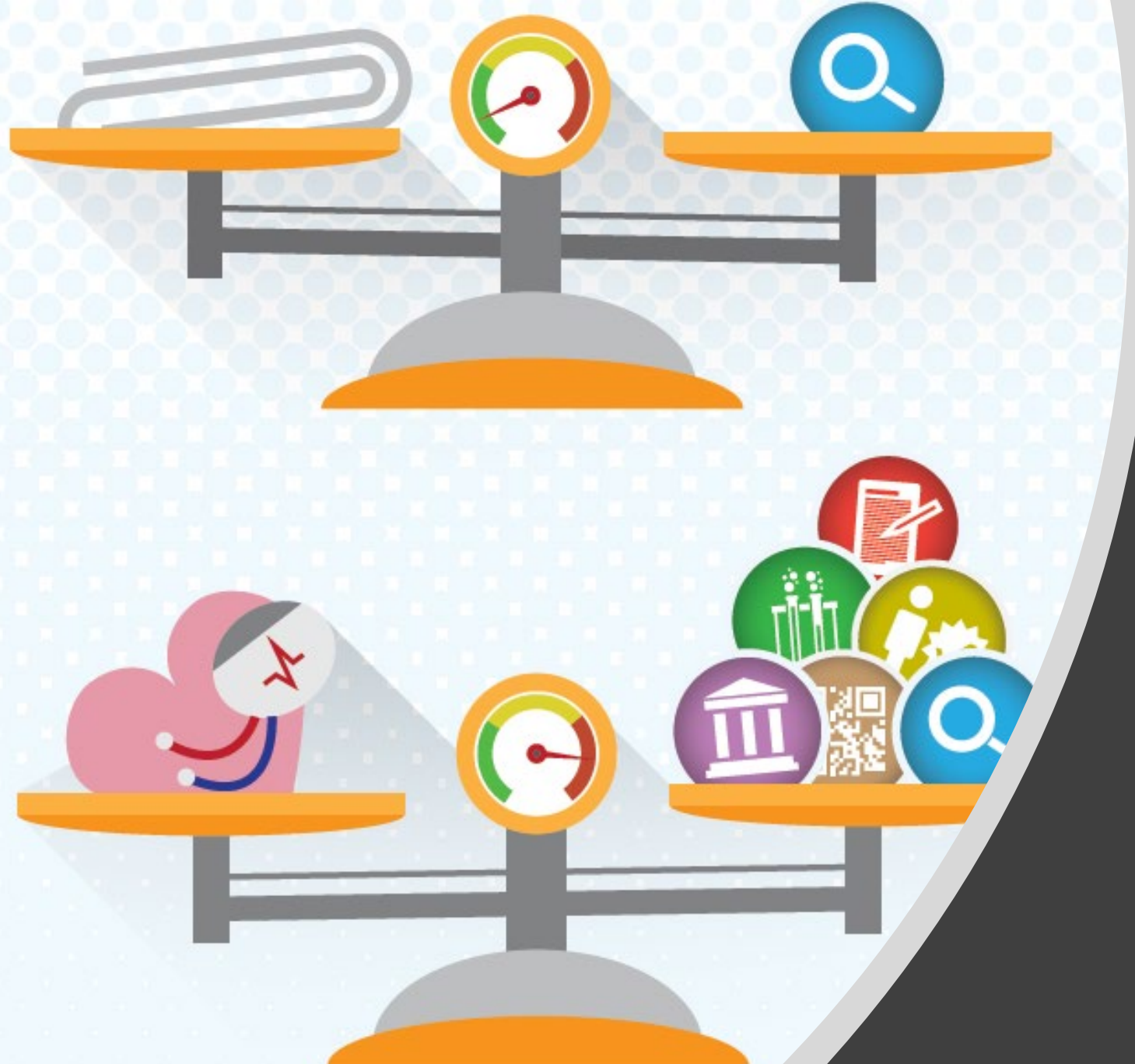
Federal Policies on Conformity Assessment

Agencies may develop conformity assessment procedures that:

- are effective and appropriate in carrying out agency missions;
- minimize the regulatory and/or conformity assessment burden on regulated entities;
- are in accordance with statutory and international obligations;
- conserve and leverage agency resources; and
- increase acceptance of U.S. products in domestic and foreign markets.

Coordination with Private Sector:

Agencies should also design conformity assessment programs with the objectives of furthering outcomes that are closely aligned with market dynamics and otherwise maximize net benefits to society. In this context, **agencies should recognize the possible contribution of private sector conformity assessment activities.** When properly conducted, conformity assessments conducted by private sector conformity assessment bodies can increase productivity and efficiency in government and industry, expand opportunities for international trade, conserve resources, improve health and safety, and protect the environment.



Balancing risk
and rigor

The Federal government uses standards and conformity assessment in many ways, including:

- Reference in regulation or voluntary programs
- Deference
- Procurement and Purchasing
- Grants
- Research and Innovation

Benefits

Robust engagement and partnership with diverse stakeholders

Durable policies, broad consensus and buy-in

Efficient and effective use of public resources



Benefits

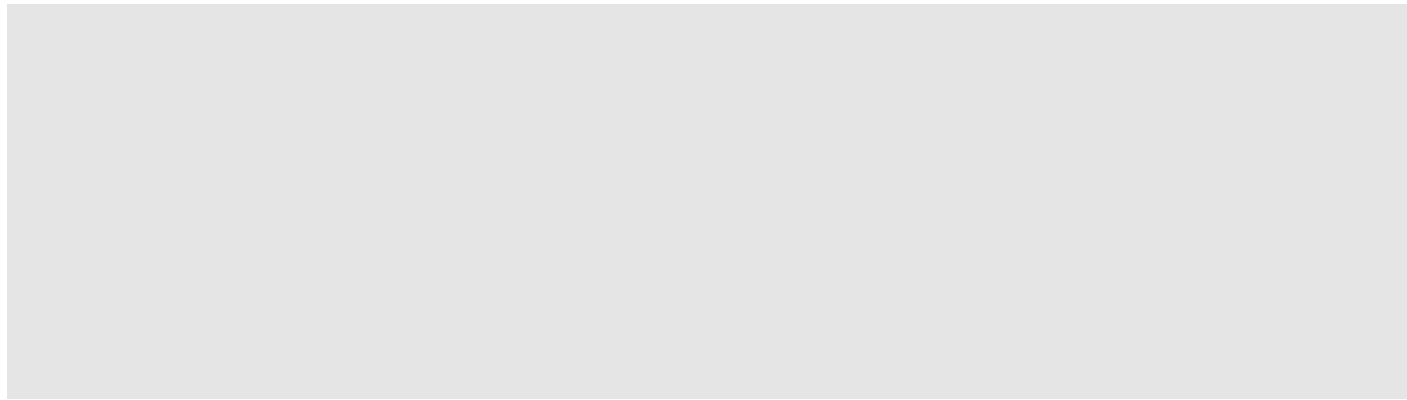
Compliance with international trade laws and obligations

Scientific exchange to spur innovation to advance EPA's mission

Development of EPA staff technical and leadership skills



For more information:
www.epa.gov/vcs





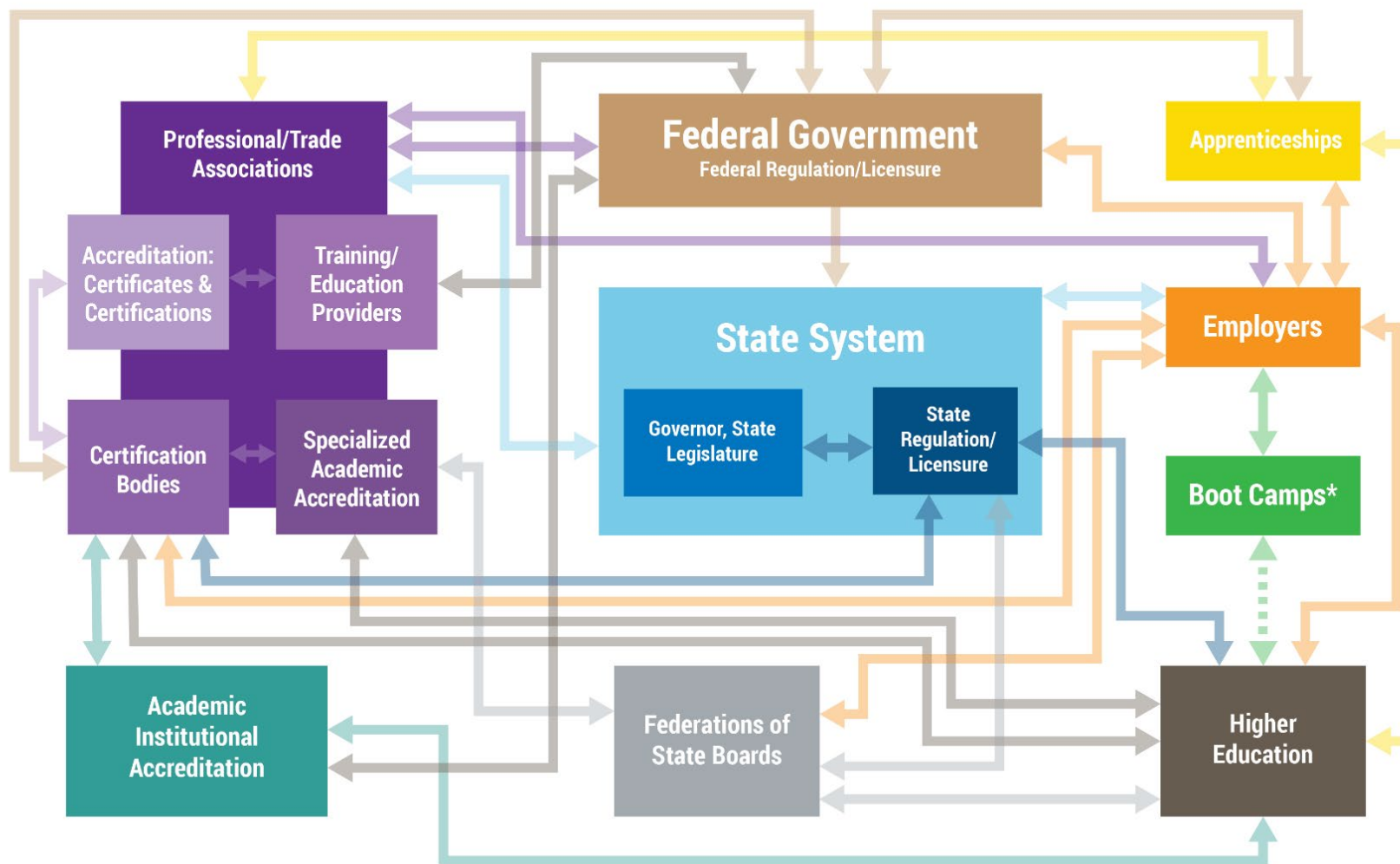
**Presentation for
Environmental Protection Agency
Information Session**

Roy Swift, Ph.D., Executive Director

April 2023

The U.S. post-secondary credentialing system is a confusing maze.

Understanding how to navigate it can be difficult.



* Although boot camps initially existed outside of the higher education system, there is increasing interest of universities to develop partnerships with boot camps.

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Credential is an “umbrella term” to denote many types of credentials such as degrees, licenses, and certifications.

A credential is not the same as a certification or a certificate. They cannot be used interchangeably.

Certifications and certificates are **types** of credentials.

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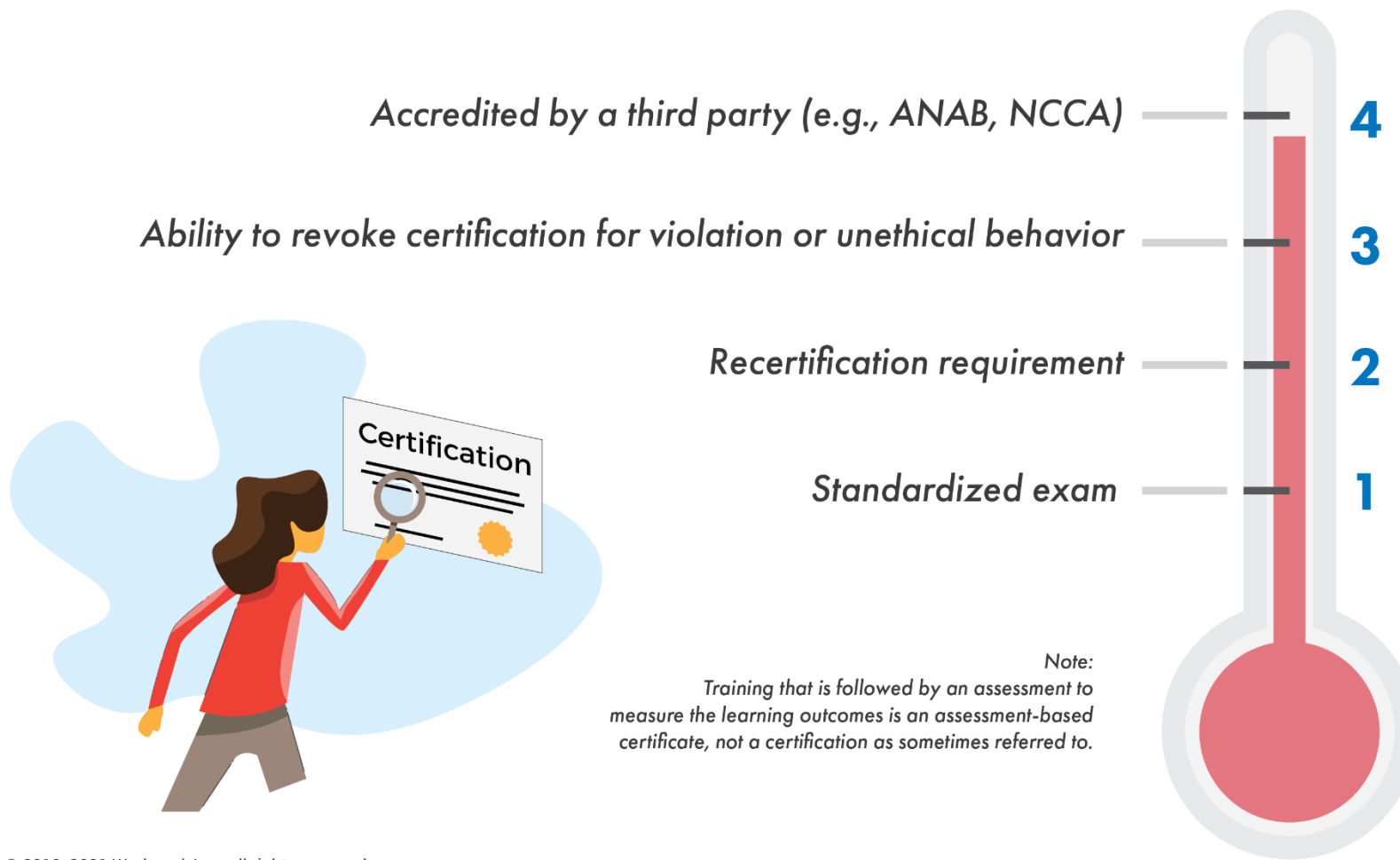
How Do Credentials Differ?

	CERTIFICATE*	CERTIFICATION	DEGREE	LICENSE
Awarded by	Education and training providers, employers, labor unions, and industry associations	Industry certification bodies	Education institutions	Government agencies
Awarded for	An exam at the end of a training or education course or a one-time assessment	Third-party, independent competency assessment	Course of study	Meeting requirements of an occupation
Indicates	Education/ knowledge/skills	Skill mastery/ competencies	Education, successfully passed courses	Legal permission
Time to complete	Variable, generally less than 2 years	Variable	Variable, generally 2 years or more	Variable
Time and renewal requirements	Often no time limit, no renewal requirement	Time-limited, includes recertification	No time limit, no renewal requirement	Time-limited, renewal generally required
Revocation process	Cannot be revoked	Can be revoked for incompetence or unethical behavior	Cannot be revoked	Can be revoked for incompetence or unethical behavior
Examples	CNC Machinist, Zurich Insurance Apprenticeship	CompTIA Cybersecurity Analyst, Certified Energy Auditor, Medical Laboratory Scientist, MLS(ASCP) ^{CM}	Bachelor of Science in Engineering, Associate of Arts in Business Administration	Electrician, Professional Engineer, Registered Nurse
Standard for accreditation	ANSI/ASTM E2659-18, a globally recognized American National Standard	ANSI/ISO/IEC 17024:2012, an international and national standard	National, regional, or programmatic	State law defines scope of practice

* There are many types of certificates. Some examples include: certificates of participation, certificates of achievement, certificates of completion for apprenticeship, and assessment-based certificates.

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DEGREES OF RIGOR FOR THE MANY FACES OF CERTIFICATION



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The Federal Government Supports Private Sector Certifications



Occupational Safety and Health Administration
– Crane Operators



Food and Drug Administration – Food Safety



Department of Defense – Cybersecurity



Department of Energy – Building Performance

ISO/IEC 17011:2017, *Conformity assessment – Requirements for accreditation bodies accrediting conformity assessment bodies*

- ISO/IEC 17011:2017 is a standard by which accreditation bodies are peer reviewed within the International Accreditation Forum (IAF) system, and that ensures quality through:
 - Legal entity, financing and liability, and establishment of accreditation schemes
 - Structural requirement to ensure impartiality
 - Competence of personnel, personnel records, and outsourcing
 - Process requirements to ensure a fair, valid, and consistent process to include complaints, appeals, and maintaining of records
 - ✓ Document review
 - ✓ On-site visit
 - ✓ Team recommendations to sub-committee of accreditation committee
 - ✓ Validation of team recommendations by sub-committee
 - ✓ Decision of accreditation committee
 - Information requirements – balance between confidentiality and publicly available information
 - Management system requirements
- Recognition by IAF allows the accreditation body to be a worldwide signatory member called Multilateral Recognition Arrangement (MRA)

ISO/IEC 17024:2012, *Conformity assessment — General requirements for bodies operating certification of persons*

- ISO/IEC 17024:2012 is a national and international standard that has been developed with the objective of achieving and promoting a globally accepted benchmark for organizations operating certification of persons.
- It sets the bar for quality through ensuring:
 - the validity, reliability, and quality of a personnel certification program
 - the individuals pass who SHOULD PASS, and individuals fail who SHOULD FAIL
 - that applicants and candidates are treated fairly
 - a process that facilitates continued competence
 - that due process procedures are in place to take away the certification for unethical or incompetent behavior
 - a continuous quality improvement approach

ISO/IEC 17024:2012 Continued

- Certification of persons is one means of providing assurance that the certified person meets the requirements of the certification scheme (body of knowledge and processes).
- Confidence in the respective certification schemes of persons is achieved by means of a globally accepted process of assessment and periodic re-assessments of the competence of certified persons.

What is a Certification Scheme as Defined by ISO/IEC 17024:2012?

- Must have a certification scheme for each category of certification
- Schemes have the following elements as required under ISO/IEC 17024
 - Scope of certification
 - Job and task description
 - Required competencies
 - Abilities (when applicable)
 - Prerequisites (when applicable)
 - Code of conduct (when applicable)
- Certification process requirements for a scheme
 - Criteria for initial certification and recertification
 - Assessment methods
 - Surveillance methods (if applicable)
 - Criteria for suspending and withdrawing certification
 - Criteria for changing the scope or level of certification (if applicable)
- Documentation to demonstrate that the following was included
 - Experts in the field and diversity of expertise
 - Assessments in alignment with competence requirements
 - Scheme reviewed and validated on an on-going and systematic basis

For More Information

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Executive Director

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workcred

Connecting credentials,
competencies, careers, customers

an affiliate of ANSI

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PROPOSED RADON CREDENTIALING CRITERIA

Katrin Kral

Policy Analyst, EPA's Center for Radon and
Air Toxics

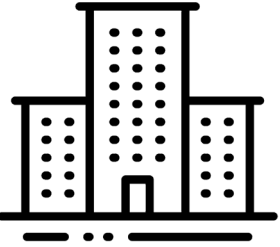
Presentation Overview

1. Role of Conformity Assessment and Standards in EPA's Approach
2. Radon Credentialing Criteria: Evaluation Framework and Implementation Approach
3. Next Steps

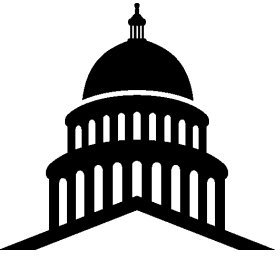
Section 1. Role of Conformity Assessment and Standards in EPA's Approach

Key Terminology

- **Credentialing Organizations and Credentials**



- **Certification Bodies:** Non-governmental, private and/or voluntary sector organization.
 - Administer **examinations** and issue **certifications**, a written assurance that an individual meets specific requirements.



- **State-Run Programs:** Credentialing programs operated by states that exercise a statutory authority at the state level to oversee radon service providers.
 - Issue **licenses**, which are official documents granting individual permission to practice an occupation.



- **Accreditation Body**

- Performs **accreditation**, a third-party validation that credentialing organization meets requirements of a designated standard (e.g., ISO/IEC 17024/2012).

Credentialing Approaches That Exist Today

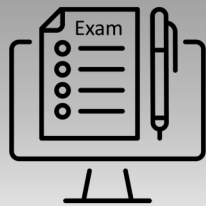


Operate **certification programs** for radon service providers.
Administer **examinations and certifications.**

*Acknowledged by EPA:
NRPP and NRSB*



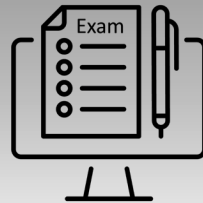
CB Certification



CB Examination



Operate **credentialing program** requiring service providers to pass a **certification examination** administered by **NRPP or NRSB.**



CB Examination



Operate **credentialing program** requiring **certification** of radon service providers by **NRPP or NRSB.**

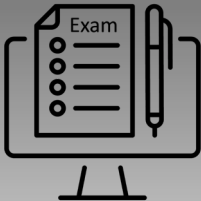


CB Certification

Credentialing Approaches That Exist Today



Operate a credentialing program and administer an independent examination.



**State-Developed
Examination**



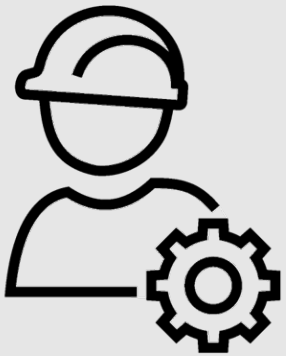
No State-Run Program: Up to radon service provider's discretion to obtain a certification.

2017 Federal Register Notice Proposal

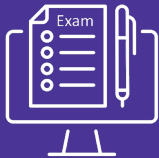
- Non-regulatory proposal outlining plan to establish criteria for organizations that credential radon service providers.
- Certification bodies would demonstrate they meet conformity assessment standard for certification of personnel (ISO/IEC 17024:2012) through third-party accreditation by an accreditation body.
- EPA would support development of certification scheme.
- Criteria would apply within the State and Tribal Indoor Radon Grants program.

Radon Credentialing Criteria and Conformity Assessment Certification Bodies

Radon Service
Provider



Examination
Administered by Third-
Party Accredited CB



Demonstrate

Certification
Body (CB)



Demonstrate

Accreditation
Body (AB)



Verify

Certification
Administered by Third-
Party Accredited CB



Verify



Indoor Air Quality (IAQ)

Stakeholder Feedback on 2017 Federal Register Notice

- Value in EPA establishing a minimum standard for credentialing of service providers.
- Third-party accreditation could result in fewer credentialing organizations, smaller workforce and additional burden on small businesses, states and consumers.
- Extensive state-run program concerns about cost, unfunded mandates, legislative barriers and insufficient SIRG funding.

Section 2. Radon Credentialing Criteria

Evaluation Framework

Specifications promoting consistency across credentialing programs

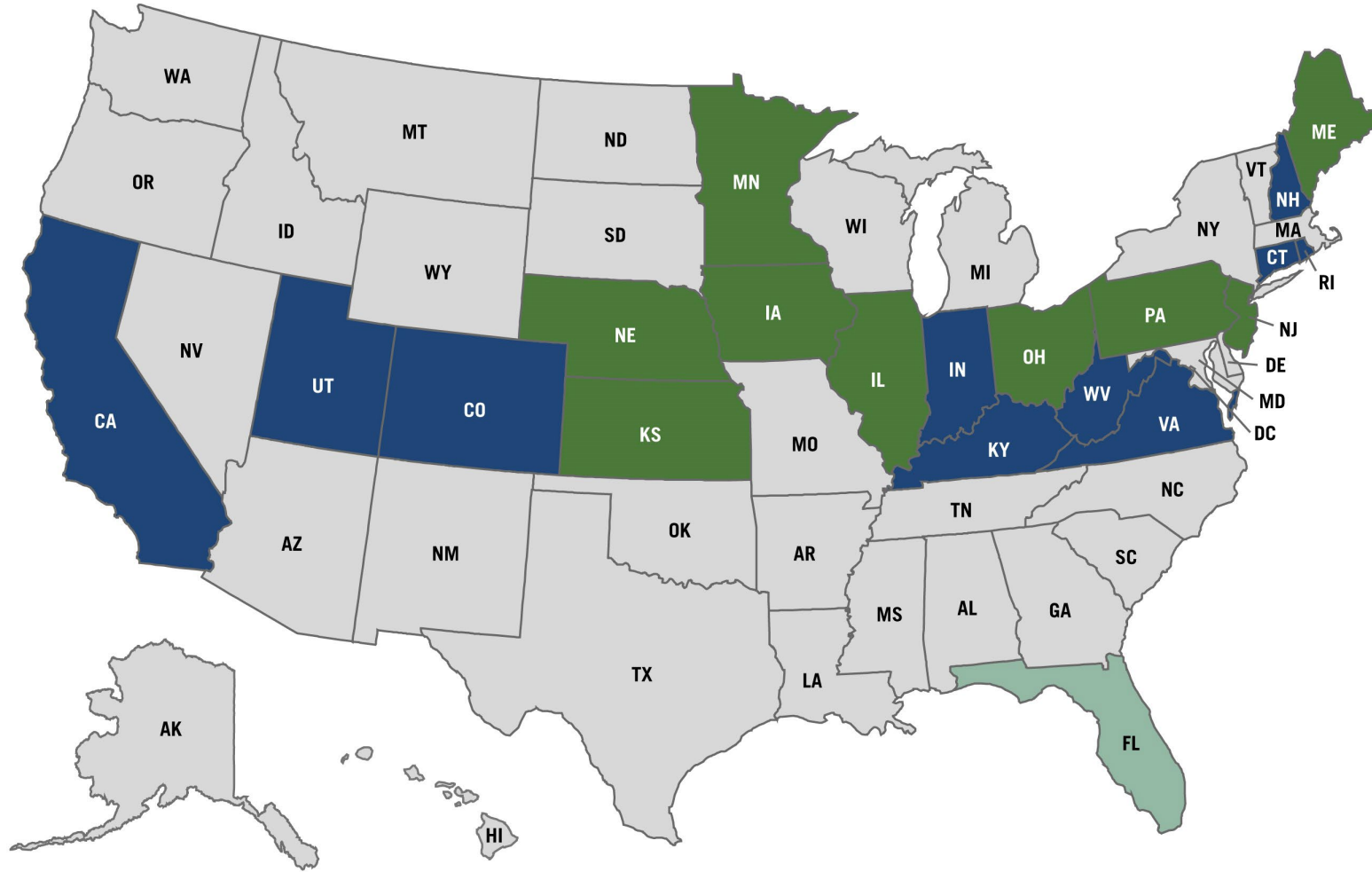
Implementation Approach

Activities to facilitate adoption of the Evaluation Framework



Feedback Requested
Federal Register Notice

State-Run Program Approaches



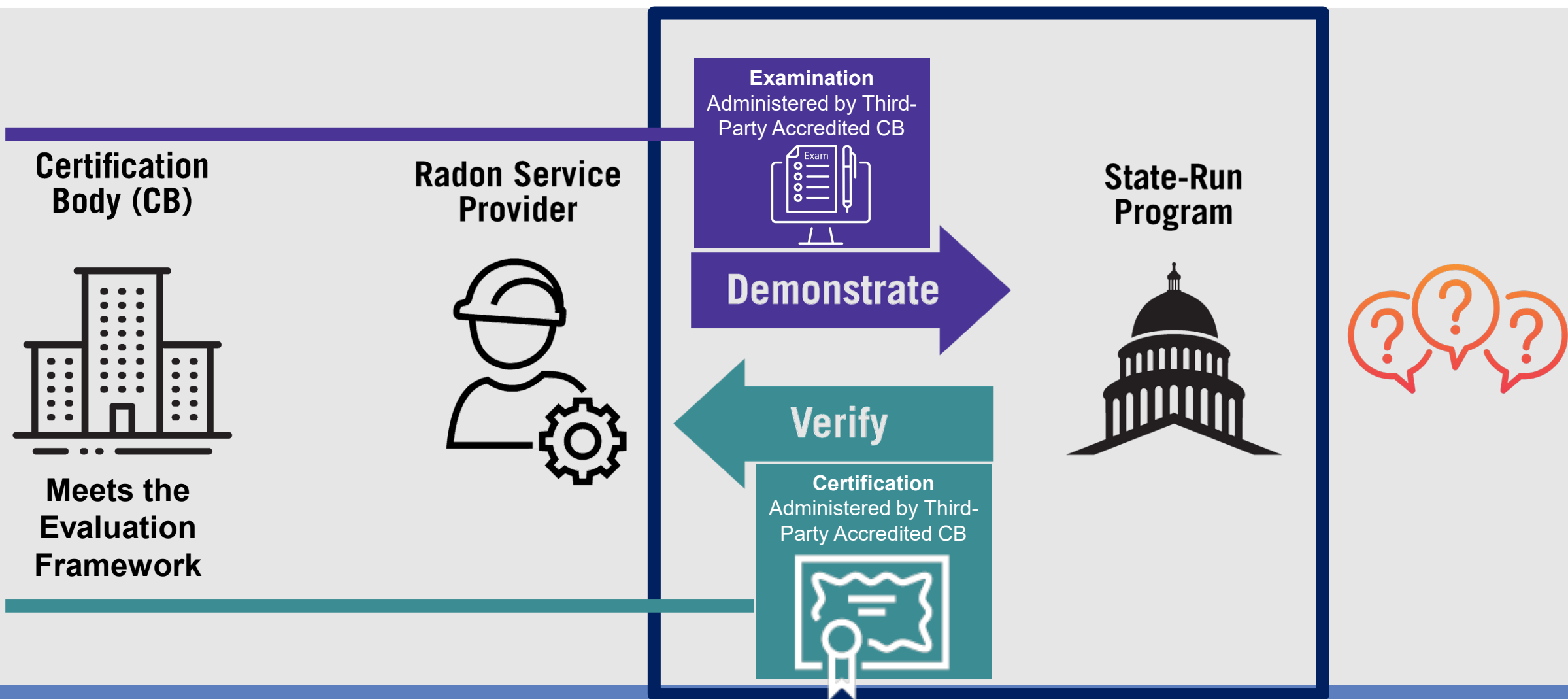
9 states requiring NRPP/NRSB examination for licensure

10 states require NRPP/NRSB certification for recognition

1 state requires state-specific examination as licensure requirement

**Draft estimates are based on publicly available data collected from online sources in 2019–2020*

Radon Credentialing Criteria & Conformity Assessment: State-Run Programs



Indoor Air Quality (IAQ)

Evaluation Framework Components



Accreditation

Verification of organizational adherence to relevant international standards for participating accreditation bodies and credentialing organizations.



Examination

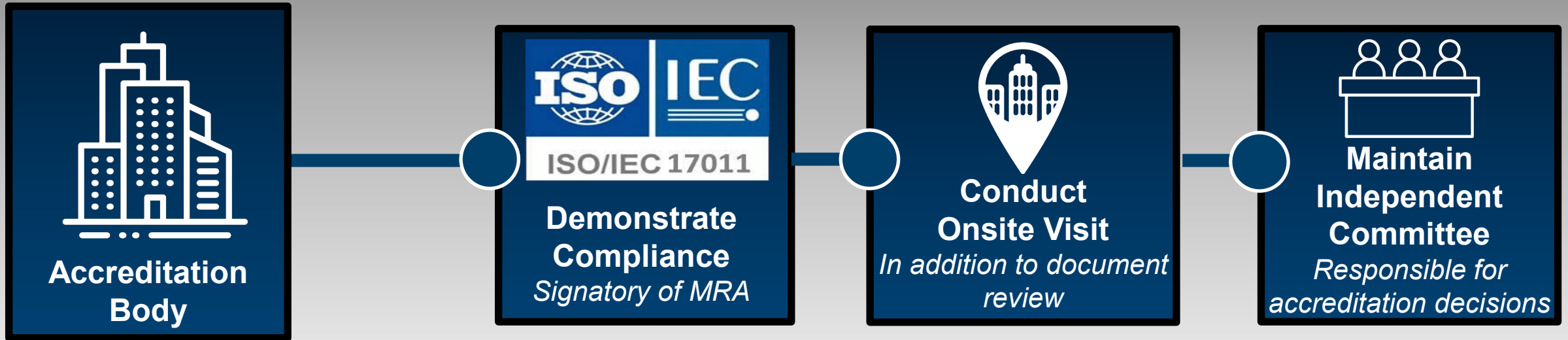
Identification and assessment of service provider knowledge, skills and competencies for specific job types (including pre-requisite training requirements).



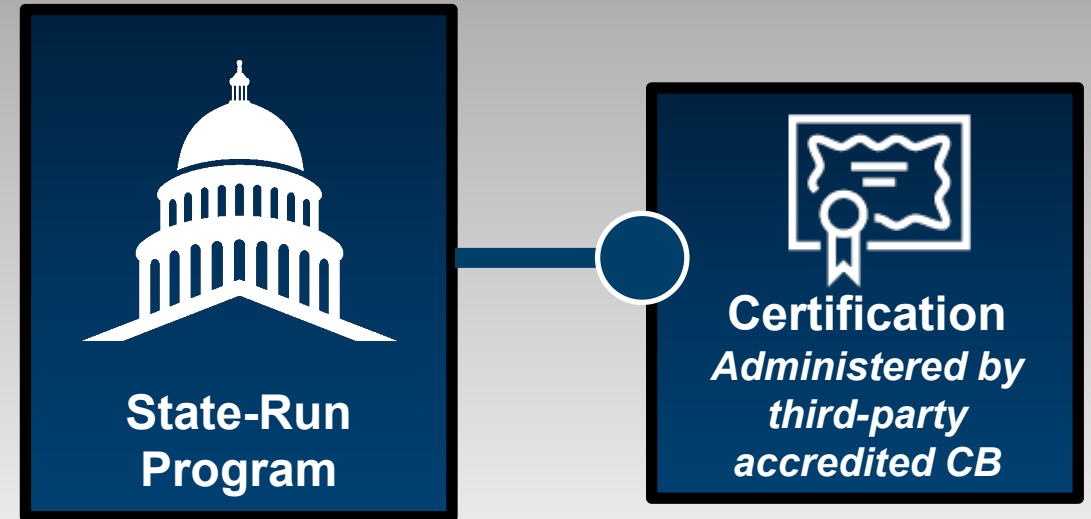
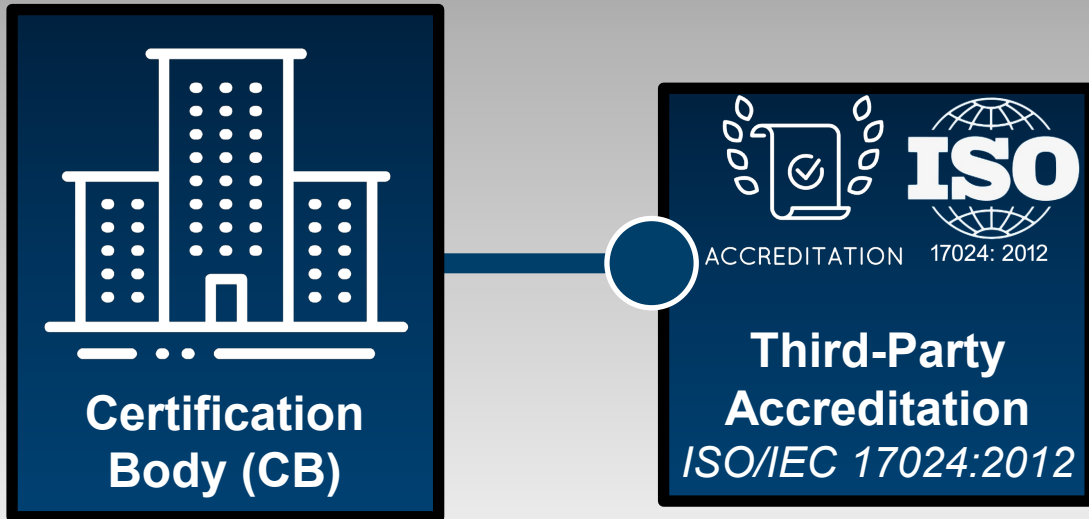
Maintenance

Maintenance of third-party accreditation (CBs) and service provider credentials (CBs and state-run programs). Verification of approved devices and maintenance of a Quality Assurance Plan (when applicable).

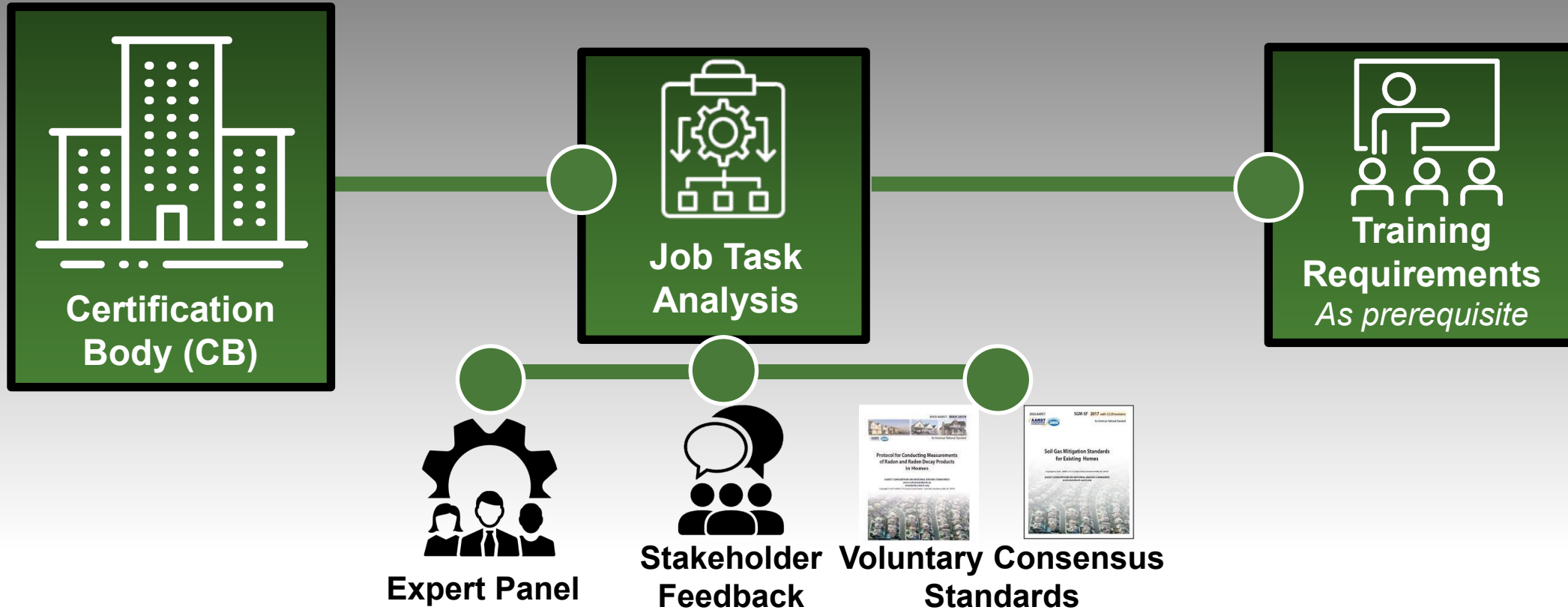
Accreditation Specifications



Accreditation Specifications



Examination Specifications



Job Task Analysis Specifications



- State-run programs
 - Require certifications
 - Require examinations
 - No credentialing program
- Tribes
- Radon testing and mitigation service providers
- Testing device and fan manufacturers
- Scientists

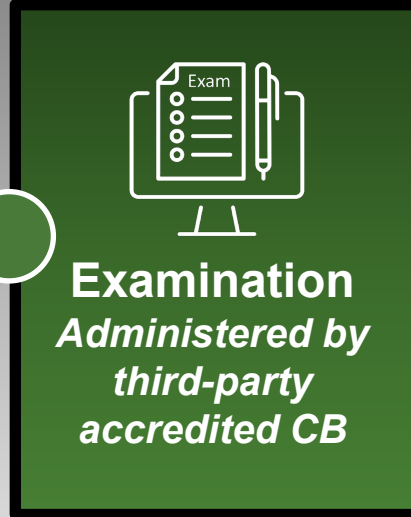


- Most current standards for radon measurement, mitigation and quality assurance:
 - MAH: Protocol for Conducting Measurements of Radon/Decay Products in Homes
 - SGM-SF: Soil Gas Mitigation Standards for Existing Homes
 - MS-QA: Radon Measurement Systems Quality Assurance

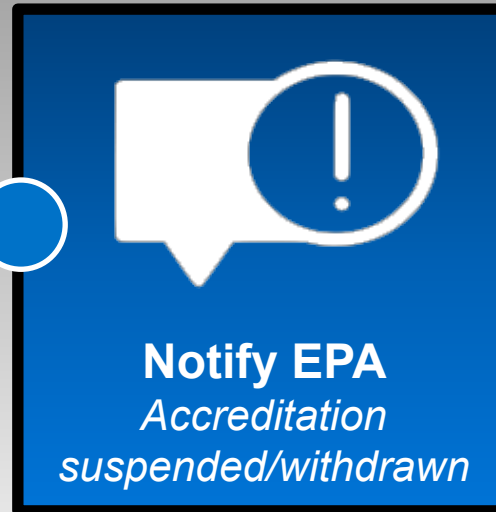
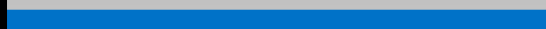


- Includes validation survey, which ensures responses received are representative of all impacted party perspectives

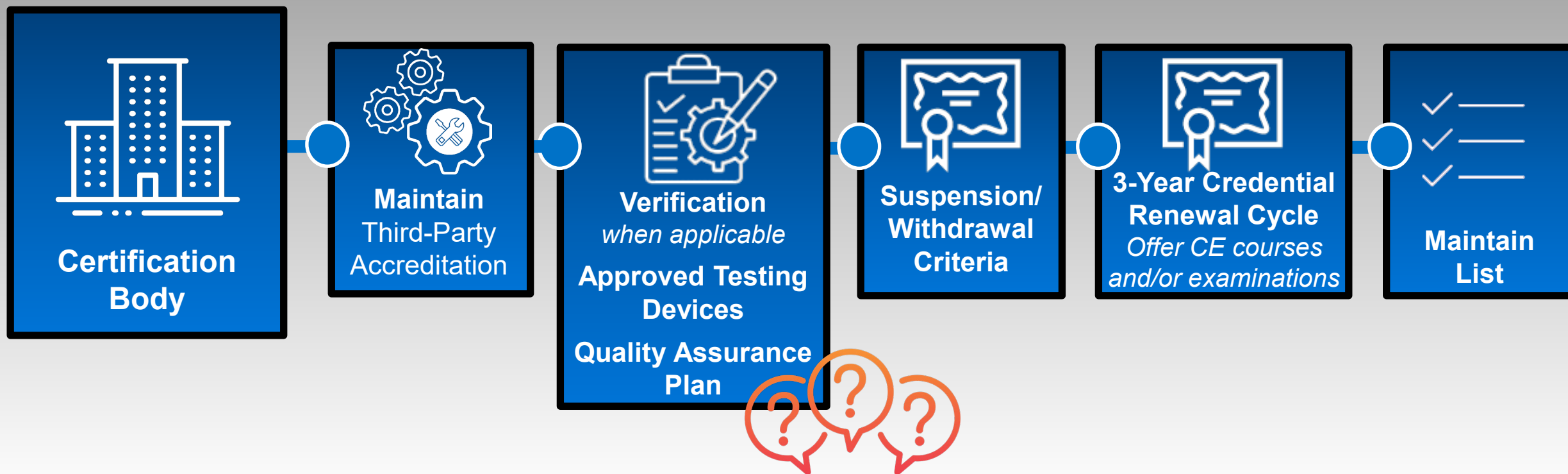
Examination Specifications



Maintenance Specifications



Maintenance Specifications



Implementation Approach



Three Year Phase-In Period:

Provide credentialing organizations time to meet framework

EPA-Maintained Public List:

Promote access to a qualified workforce

Annual Attestation:

Ensure framework requirements met

Conditions for State Indoor Radon Grants:

Promote quality standard for credentialing

Ensure access to providers with these credentials

Implementation Approach: Time Periods



***Radon
Credentialing
Criteria
Being Finalized***



**3-Year
Phase-In Period**
Criteria Finalized



**Post 3-Year
Phase-In Period:**
Criteria Finalized



Indoor Air Quality (IAQ)

EPA-Maintained Public List



NRPP/NRSB

Met EPA's previously established criteria



NRPP/NRSB

Credentialing Organizations / Accreditation Bodies

Meeting Framework



Credentialing Organizations / Accreditation Bodies

Meeting Framework

Annual Attestation: Certification Bodies



Declare Intent

Annual Updates

Accreditation Body → EPA



Annual Attestation

Accreditation Body → EPA

Annual Attestation: State-Run Programs

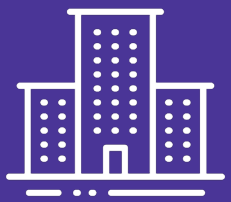


Declare Intent

Annual Updates
EPA



Annual Attestation
EPA



REVIEW: Conformity Assessment *Certification Bodies*

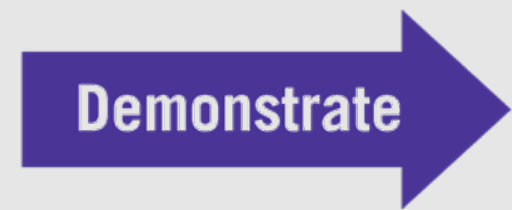
Radon Service
Provider



Certification
Body (CB)



Accreditation
Body (AB)





REVIEW: Conformity Assessment *State-Run Programs*

Radon Service
Provider



Demonstrate

Verify

State-Run
Program



Demonstrate

Verify

EPA



Indoor Air Quality (IAQ)

State Indoor Radon Grants (SIRG)

Maintaining Service Provider Lists



NRPP/NRSB
Certifications



NRPP/NRSB
Certifications
And/or
Credentials
Administered by
Organizations
Recognized by EPA



ONLY
Credentials
Administered by
Organizations
Recognized by EPA

SIRG Examples – Maintaining Lists

States with NO Credentialing Program



Providers with
NRPP/NRSB
Certifications



Providers with
NRPP/NRSB
Certifications

And/or

Providers credentialed
by EPA-Recognized
Certification Bodies



ONLY
Providers credentialed
by EPA-Recognized
Certification Bodies

SIRG Examples – Maintaining Lists

States with Credentialing Programs



Providers credentialed
by state
+
Identify providers
certified by
NRPP/NRSB



*Once state-run
program recognized by
EPA,
ONLY
providers credentialed
by the state*



ONLY
providers credentialed
by the state, provided
the state-run program is
recognized by EPA

3. Next Steps

How to Submit Comments (Deadline: May 22, 2023)



1. Access the [Federal Register Notice](#) and [Proposed Radon Credentialing Criteria](#) document.
2. Follow the instructions in the Notice for submitting comments.

Explain your reasoning for any requested changes.

Describe any assumptions.

Provide any technical information and/or data that you used to inform your feedback.

Next Steps

- May 22, 2023** ● Comment period closes.
- Spring-Fall 2023** ● Analyze comments and finalize approach.
- Winter 2023-24** ● Publish Final Radon Credentialing Criteria.
Initiate implementation.

