

## Information Session: Proposed Radon Credentialing Criteria

April 12, 2023

### Questions and Answers Document

On April 12, 2023, EPA's Indoor Environments Division (IED) held a 90-minute information session webinar on its Proposed Radon Credentialing Criteria during the public comment period. The purpose of the session was to support stakeholders preparing to submit comments, provide information about the proposed criteria, and answer only clarifying questions. EPA's goal was to ensure that stakeholders understand EPA's role in overseeing quality of radon service providers, how conformity assessment and voluntary consensus standards and other private sector standards can be applied within federal programs, the Proposed Radon Credentialing Criteria, and how to submit comments.

Although not all of the questions submitted by stakeholders during the session were strictly clarifying questions, EPA recognizes the need to attempt to answer some of the questions to the best of its ability. This document contains the questions asked during the session and EPA's responses.

The [Proposed Radon Credentialing Criteria document](#) (referred to hereafter as the "criteria document") is available online, and [comments may be submitted online](#). The criteria are composed of:

- **Evaluation Framework** (Section III of criteria document, pages 14–16): outlines specifications to promote consistency across credentialing programs operated by certification bodies and states.
- **Implementation Approach** (Section IV of criteria document, pages 17–20): details the EPA's planned activities to facilitate adoption of the Evaluation Framework specifications.

The [April 12 information session webinar and accompanying slides](#) are available on demand.

#### List of Acronyms

AB	accreditation body
CB	certification body
EPA	U.S. Environmental Protection Agency
ISO/IEC	International Organization for Standardization/International Electrotechnical Commission
MOUs	memoranda of understanding
NRPP	National Radon Proficiency Program
NRSB	National Radon Safety Board
SIRG	State and Tribal Indoor Radon Grants Program

## Questions and Answers

**Question 1:** How do we get approved to provide credentials for radon service providers? Is there a site I can go to get more information about the process?

**Answer 1:** If the criteria are finalized as proposed, certification bodies (CBs) offering credentials for radon service providers can become EPA-recognized by meeting all Evaluation Framework specifications and achieving accreditation from an accreditation body (AB) under ISO/IEC 17024:2012 (Conformity Assessment—General Requirements for Bodies Operating Certification of Persons). CBs will have 3 years to complete this process and must receive third-party accreditation from an EPA-recognized AB. Stakeholders are encouraged to provide feedback on this proposed time-frame.

To read the proposed criteria and provide comments, please visit: [www.regulations.gov/docket/EPA-HQ-OAR-2017-0430](http://www.regulations.gov/docket/EPA-HQ-OAR-2017-0430).

**Question 2:** Has EPA estimated the cost for an organization to obtain ISO 17024 certification, as well as the cost per person to achieve a radon credential under the proposed criteria?

**Answer 2:** EPA is seeking information through the Federal Register Notice on anticipated costs for a CB to receive third-party accreditation to ISO/IEC 17024:2012, which may include anticipated impacts on costs to administer examinations and certifications for radon service providers.

The cost per person to achieve a radon credential under the proposed criteria from an ISO/IEC 17024:2012–accredited CB typically ranges from \$200.00–\$400.00, which may be compared with the cost for obtaining certification under current systems.

**Question 3:** The proposal states: *“If certification is required as part of [a] state-run credentialing program, the program must rely on certifications only from an ISO/IEC 17024:2012 third-party accredited certification body”* (on page 22). Will this proposal eliminate state licensing (for example, in PA and IL) because it requires any state-listed radon professionals to be certified to NRPP (or another certified organization) at the end of the 3-year phase-in period?

**Answer 3:** The proposed criteria are not intended to “eliminate state licensing.” Many states, including PA and IL, already require NRPP and/or NRSB examination for licensure.

Appendix A, *“Evaluation Framework Specifications By Entity,”* (pages 21-22 of the criteria document; specific reference on page 22) identifies the Evaluation Framework specifications by entity in table format for the three framework components: Accreditation, Examination and Maintenance. The specification referenced in the question falls within the Accreditation component and refers to requirements for states with their own state-run credentialing program. At the end of the 3-year phase-in period, states that operate their own credentialing program will need to self-attest to EPA that they meet the Evaluation Framework (i.e., any specification that lists “state-run program” in *Figure 3. Evaluation Framework* on page 16 of the criteria document), and the state would need to rely on

examinations or certifications only from a CB recognized by EPA. (The specification referenced in this question refers to states that rely on certification for their credentialing program). Relying on examinations or certifications from EPA-recognized CBs will help ensure consistency across competencies assessed.

**Question 4:** Please clarify the requirements for “*State-run credentialing program[s] requiring certification administered by a third-party accredited certification body*” (described on page 20). Is EPA requiring all radon professionals in licensing states to buy an additional certification for the 3-year phase-in period?

**Answer 4:** The proposed criteria would not require radon professionals in “licensing states” to buy an additional certification during the 3-year phase in period.

The scope of radon service providers required to be credentialed will be determined by states. EPA lacks statutory authority to require actions on the part of radon service providers and state or tribal governments. Nonetheless, EPA may set conditions for receiving funding as part of the State and Tribal Indoor Radon Grants (SIRG) Program. The Agency plans to limit its grant assistance to states that, as a condition of the grant, refer consumers only to providers credentialed by organizations that meet the Evaluation Framework at the end of the 3-year phase-in period.

During the 3-year phase in period, grantees that operate a credentialing program (state-run program) will be encouraged to continue to highlight providers credentialed by NRPP and/or NRSB (also addressed in Question 14 below). Once a state-run program is recognized on EPA’s website as meeting the Evaluation Framework, the state will only be expected to list providers credentialed by the state (for more information, see *Conditions for EPA’s SIRG Program* on pages 18–20 of the criteria document).

**Question 5:** What specific organizations besides the American National Standards Institute are recognized by EPA as an AB?

**Answer 5:** Currently no ABs are recognized by EPA as described in the proposed Implementation Approach (Section IV of the criteria document, pages 17–20). If finalized as proposed, ABs that wish to participate and be recognized by EPA will demonstrate that they meet the relevant Evaluation Framework specifications. EPA will maintain a public list of these ABs and anticipates entering into memoranda of understanding (MOUs) to facilitate the integration of the Evaluation Framework into the third-party accreditation process and reporting to EPA on accreditation status.

**Question 6:** Does EPA intend to require both fraud/harm to consumers and “proven incompetence” to suspend or withdraw a credential? Will there be an appeals process required by EPA, if not included as part of ISO 17024? Will state-run programs lose autonomy in this regard, since the credentialing organization will not be the state if it accepts SIRG?

**Answer 6:** The Maintenance component of the Evaluation Framework (*Figure 3. Evaluation Framework* on page 16 of the criteria document) includes the following specification for credentialing organizations operated by CBs or states: “*Criteria for suspending and withdrawing a credential issued by a certification body or*

*state-run program must include proven fraud of or harm to customers and proven incompetence related to radon testing or mitigation.”*

This specification outlines minimum requirements that must be incorporated into a credentialing program’s suspension and withdrawal criteria. This pertains only to credentialing organizations operated by CBs or states that are seeking recognition from EPA.

Section 9.8 of ISO/IEC 17024:2012 addresses appeals. It requires the CB to have a documented and transparent appeals process to receive, evaluate and make decisions on appeals. Appeals must be dealt with in a constructive, impartial and timely manner. As proposed, the Evaluation Framework specifications do not require that states operating credentialing programs demonstrate that an appeals process is a component of the state-run program. EPA welcomes feedback on whether this should be included within the Evaluation Framework.

**Question 7:** Are state licensing programs required to have a 3-year license renewal period?

**Answer 7:** Yes, the Maintenance component of the proposed Evaluation Framework (*Figure 3. Evaluation Framework* on page 16 of the criteria document) includes a specification that credentialing organizations (CBs or states) ensure that credentials are renewed at least every 3 years. Stakeholders are encouraged to provide feedback on this proposed time-frame, including specific alternative solutions to maintain quality service in line with stakeholder goals.

**Question 8:** How should groups advancing new state laws that cover radon testing and mitigation take into consideration EPA’s proposed framework?

**Answer 8:** EPA may set conditions for receiving funding as part of the SIRG Program authorized under the Indoor Radon Abatement Act. Therefore, the Evaluation Framework developed by EPA (Section III of the criteria document, pages 14–16) would apply only to states and tribes that operate credentialing programs and receive SIRG funds.\* States would have 3 years to make any necessary modifications within their organizational structures to bring their credentialing programs into alignment with the Evaluation Framework. Stakeholders are encouraged to provide feedback on this proposed timeframe, including specific alternative solutions to maintain quality service in line with stakeholder goals.

EPA acknowledges that differences in state program structures and potential legislative or regulatory barriers must be considered. The Evaluation Framework is intended to maintain flexibility for state-run programs while also ensuring consistency across credentialing programs in the United States. The Evaluation Framework outlines specifications for state-run programs that maintain reliance on CBs for examinations and/or certifications as part of a state’s credentialing program, provided those organizations are recognized by EPA. This will help standardize service provider competencies and examination protocols across credentialing programs offered by states, potential future tribal

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\* *Note:* The Implementation Approach (Section IV of the criteria document, pages 17–20) outlines EPA’s planned activities to facilitate adoption of the Evaluation Framework, including establishing conditions for the SIRG Program. These conditions will apply to all grantees, regardless of whether they operate a credentialing program. For more information see *Conditions for EPA’s SIRG Program* on pages 18–20 of the criteria document.

credentialing programs, and CBs. The Evaluation Framework also includes specifications that address maintenance of service provider credentials and credentialing programs (e.g., prerequisites, recertification period and requirements, suspension and withdrawal requirements).

**Question 9:** Is it necessary for EPA to approve organizations that want to provide radon credentialing, or is it sufficient for the organization to obtain ISO/IEC 17024:2012?

**Answer 9:** While any organization can claim to provide radon credentialing, recognition by EPA will facilitate identification of qualified radon service providers credentialed by organizations meeting a standardized set of specifications outlined in the Evaluation Framework. This may increase and/or serve to validate the overall quality of radon testing and mitigation services. Organizations recognized by EPA will have demonstrated via third-party accreditation to ISO/IEC 17024:2012 that they also meet all relevant Evaluation Framework specifications (i.e., any specification that lists “certification body(ies)” in *Figure 3. Evaluation Framework* on page 16 of the criteria document).

ISO/IEC 17024:2012 **only addresses the processes** to obtain validated content of the profession (in this case radon service providers) that will inform examination development. The Evaluation Framework identifies specifications within the Examination and Maintenance components that are designed to help standardize identification and assessment of service provider competencies and credentialing program requirements (e.g., prerequisites, recertification period and requirements). Third-party accreditation to ISO/IEC 17024:2012, a requirement within the Evaluation Framework, will help create a standardized process to identify and regularly evaluate CBs’ adherence to the Evaluation Framework specifications. By recognizing organizations accredited to ISO/IEC 17024:2012 **and** that meet all relevant Evaluation Framework specifications, EPA will support consistency across service provider competencies, examinations and credentialing requirements.

**Question 10:** If a state currently receives SIRG funding and does not require credentialing, what is required to continue receiving SIRG funding? Do states need to demonstrate compliance to ISO/IEC 17024:2012 to meet the proposed requirements in the Evaluation Framework and meet the SIRG condition?

**Answer 10:** EPA is not proposing that any state—regardless of whether it operates a credentialing program—demonstrate compliance to ISO/IEC 17024:2012.

At the end of the 3-year phase in period, state grantees that do not operate a credentialing program may *only* list radon service providers who are certified by an EPA-recognized CB. By only listing service providers credentialed by organizations identified on EPA’s website as meeting the Evaluation Framework, the state would be fulfilling its obligation to continue receiving SIRG funding as described in the Implementation Approach (Section IV of the criteria document, pages 17–20).

**Question 11:** How many radon credentialing programs are currently known to the EPA to be ISO/IEC 17024:2012 compliant?

**Answer 11:** ABs, not EPA, currently maintain lists of CBs that have achieved third-party accreditation to ISO/IEC 17024:2012. Any organization currently accredited to ISO/IEC 17024:2012 will not have demonstrated

that they also meet the Evaluation Framework specifications. If finalized as proposed, as part of the third-party accreditation process, EPA-recognized ABs will verify that CBs meet all relevant Evaluation Framework specifications (i.e., any specification that lists “certification body(ies)” in *Figure 3. Evaluation Framework* on page 16 of the criteria document). As described in response to question 9 above, this includes specifications within the Examination and Maintenance components that are designed to help standardize identification and assessment of radon service provider competencies and credentialing program requirements.

**Question 12:** Will there be reporting standards for radon device manufacturers? This may include standard ways to advertise the device capabilities, use standardized terms and use a standardized form for device calibrations.

**Answer 12:** No. As proposed, the Agency is not including reporting standards for radon device manufacturers. The Agency is proposing to address components of testing devices within the Evaluation Framework that relate specifically to a provider’s ability to perform measurement services in accordance with relevant voluntary consensus standards (*Figure 3. Evaluation Framework* on page 16 and Section II, Comment Area 5 on page 13 of the criteria document).

The Agency recognizes that credentialing organizations may also perform additional functions that are important to maintenance of systems that support quality measurement and mitigation services, including approving and registering radon measurement devices. Although it is outside the scope of this effort to address these functions, the Agency will consider whether they should be covered under a separate process and invites feedback on what might be considered.

**Question 13:** Is this only for domestic organizations or will international certification systems, like C-NRPP (Canadian NRPP), also be considered (if they demonstrate compliance to ISO/IEC 17024:2012)?

**Answer 13:** This proposal is focused on domestic organizations at this time. If there is a reason that service providers in the United States would need and/or benefit from holding an international certification, then please leave a comment. The ISO/IEC 17024:2012 is recognized in many other countries through the International Accreditation Forum processes.

**Question 14:** How would a state that requires an NRPP and/or NRSB examination highlight which state licensees also maintain an NRPP and/or NRSB certification for purposes of meeting SIRG conditions?

**Answer 14:** To meet the SIRG condition, states operating their own credentialing programs (state-run programs), would have to meet the Evaluation Framework and be included on EPA’s public list as a recognized credentialing organization within the 3-year phase-in period. Prior to being recognized by EPA, state-run programs will be encouraged to highlight radon service providers who also maintain a certification from NRPP and/or NRSB. It will be up to the state to decide how to highlight these radon service providers. Lists of certified service providers may be accessed by state at:

- NRPP: [nrpp.info/pro-search/](http://nrpp.info/pro-search/) (input state instead of ZIP code)
- NRSB: [nrsb.org/find-a-pro/](http://nrsb.org/find-a-pro/)

**Question 15:** If a state has regulations to license radon professionals, does the state need to demonstrate compliance to ISO/IEC 17024:2012 to continue this practice, or does the state only need to agree to use an exam from a program that is recognized by EPA?

**Answer 15:** EPA is not proposing that states operating credentialing programs (state-run programs) become third-party accredited to ISO/IEC 17024:2012. As proposed, state-run programs participating in the SIRG program would demonstrate to EPA that they meet the Evaluation Framework by the end of the 3-year phase-in period (i.e., any specification that lists “state-run program” in *Figure 3. Evaluation Framework* on page 16 of the criteria document), which requires state-run programs to rely on an examination or certification from an EPA-recognized CB. These CBs would be third-party accredited to ISO/IEC 17024:2012 by an EPA-recognized AB and would have demonstrated that they meet the Evaluation Framework specifications as part of the accreditation process.

**Question 16:** I am a radon service provider. How do these criteria apply to me?

**Answer 16:** The criteria do not apply directly to radon service providers. They will, however, impact the credentials issued to radon service providers by CBs and states that elect to be recognized by EPA as meeting the Evaluation Framework. Credentials issued and maintained by these entities will be recognized by EPA as addressing minimum requirements for the identification and assessment of service provider competencies and maintenance of credentials. This will support standardization of quality among radon service provider credentials and credentialing organizations, which may support streamlined approaches to addressing provider credentials within radon testing/mitigation polices and lead to expanded markets for radon service providers.

**Question 17:** Can a university create a CB?

**Answer 17:** Generally, a university would not be able to obtain accreditation to ISO/IEC 17024:2012 from an AB because certification functions must be fire-walled away from education to allow for third-party verification of competencies. If the university has an institute that is considered independent from the academic legal entity, then a certification program could be developed.