



**Comments Received on WaterSense® Draft
Professional Certification Program Labeling System
and Revised Specifications for Professional
Certification Programs**

February 27, 2014



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Commenter: Paul Deering
Affiliation: Deering Design
Comment Date: September 24, 2013

Email Text:

As a Landscape Architect - our drawings dictate to Landscape Contractors the design, products and procedures to be followed in the installation of irrigation systems, planting and surfacing. Landscape Architects today meet strict conditions for water conservation imposed by states and local municipalities. A program for Landscape Architects in Watersense just makes sense.

Yes - we produce no product to label, but we are the ones who design the systems, and often even produce the irrigation schedules and maintenance procedures that Landscape Contractors and Landscape Maintenance companies carry out. Watersense could be a vehicle through which new irrigation, planting and surfacing concepts are disseminated and adopted in the Landscape Community.

As a licensed professional for more than 30 years, I would ask that any such Watersense program for Landscape Architects avoid the bureaucratic bloat of certification and paperwork compliance as we are all experiencing with LEED. LEED has gained a reputation as a paperwork and income-generation monolith that many of my clients are choosing to avoid - while at the same time implementing the technology that LEED was originally intended to promote. Look into a Performance-Based system, rather than a Paperwork-Based system.

Thank you,

Paul Deering
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Commenter: Mary Ann Dickinson
Affiliation: Alliance for Water Efficiency
Comment Date: November 19, 2013

Email Attachment:

**PUBLIC COMMENT SUBMISSION ON
DRAFT WATERSENSE PROFESSIONAL CERTIFICATION
PROGRAM LABELING SYSTEM**

Commenter Name: Mary Ann Dickinson, President and CEO

Commenter Affiliation: Alliance for Water Efficiency

Date of Comment Submission: Tuesday, November 19, 2013

Topic: 5.2 Eligibility Requirements for EPA Approved PCOs

Comment: Our review team had some concerns regarding the inclusion of an accreditation path vs. non-accreditation path.

Rationale: Two key concerns were expressed:

- 1) Inclusion of an accreditation path is a positive move if the objective is to credibly increase professionalism. However, to our knowledge no irrigation professional certifying organizations currently meet the accreditation path requirements. Inclusion of an accreditation path may elevate the WaterSense program on paper, but does not actually increase professionalism of irrigation service providers who are certified by PCOs.
- 2) Though to our knowledge no irrigation professional certifying organizations currently meet the accreditation path requirements, by including this section in the specifications at this time the WaterSense program is raising the specter that a PCO may soon undertake the exorbitant cost of becoming a WaterSense PCO under the accreditation path. If any of the PCOs make the commitment to accreditation it may lead to the eventual exclusion of worthy PCOs that do not have the resources to undertake accreditation.

Suggested Change (or Language): Eliminate section 5.2.1 Accreditation Path and retain only section 5.2.2 Non-Accreditation Path. It is our review team's opinion that there is sufficient rigor in section 5.2.2. to uphold the quality of the WaterSense label.

Topic: 5.2.2.6 Security of Assessment Instruments

Comment: Please add clarifying language regarding who is allowed to administer the exam.

Rationale: Our review team was confused by the language in this section and asked WaterSense staff for clarification of the intent. We received this reply, “WaterSense requires that the person administering the test is different from the person training the professionals or the person proctoring the exam. The person we really call out here that must be different is the test administrator. The trainer and test proctor can be the same person.”

The practice of having the trainer and test proctor as the same person is contrary to best practices for certification. Examples include the American Backflow Prevention Association certifications “An ABPA Proctor is a person who administers the written and / or performance examinations. The Proctor will be appointed by the Administrator for a specific examination. The Proctor shall not have a private or personal interest sufficient to influence or appear to influence the objective exercise of the Proctor’s official duties.” <http://www.abpa.org/?page=Proctor>

Here is the problem: the PCO is always judged on their effectiveness by the percentage of students that pass the exam. Therefore; the organization that does the training has motivation to improve the pass/fail ratio. There are subtle and not so subtle ways the proctor might improve pass/fail ratios, and sometimes unintentionally. In contrast, the proctor and the test scorer are not judged by the pass/fail ratio - for their task is only to administer and score the exam.

Where the PCO, and specifically the trainer, is also proctoring the exam there is clearly a private or personal interest sufficient to influence or appear to influence the objective exercise of the proctor’s official duties. Keeping a separation of duties assures that all parties are free of any conflicts of interest. This best practice enhances the integrity of any certification exam process, and will enhance the credibility of all WaterSense PCO.

Suggested Change (or Language): The PCO shall have procedures in place to ensure that exams are ~~administered~~proctored by an independent academic institute, a professional testing organization, professional test administrator, or a professional certified in the subject matter not involved in the training.

Topic: 8.1.5 Follow the WaterSense Program Mark Guidelines

Comment: Change of partnership status for irrigation professionals and new labeling instruction is somewhat unclear.

Rationale: The change seems to decrease the value of WaterSense labeling to the individual and increase the value of WaterSense labeling to the PCO.

A professional who puts forth the effort (and money) to complete a certification course should be able to use a label, like the one pictured below, that has value. The association with a certifying body offers the desired credibility. By replacing WaterSense Partner label with the WaterSense promotional label, the number of individuals completing the certification process could diminish. The objective is to elevate the skill level of the professionals in the industry and offer a means to promote their achievements.

Suggested Change (or Language): It is rather irregular to provide labeling examples within a specification, but in this case a picture may be worth a thousand words. If we interpret the language in the specification the certified irrigation professional must not use the WaterSense partner mark and now may only use the pictured mark on their business card or website:



If the label pictured above is indeed allowed, the change would uphold the value of labeling to the individual as well as increasing the value of labeling to the PCO. The present language did not make clear the value to both parties.

Topic: 8.2. Responsibilities Regarding Adopted Programs

Comment: Our review team appreciates the clear language delineating the relationship between the Parent PCO and Adopting PCO in regard to WaterSense labeled certification.

Rationale: The language in section 8.2 focuses on requirements to assure that the quality of WaterSense labeling is retained without specifying other aspects of any agreement between a Parent PCO and Adopting PCO.

Suggested Change (or Language): None.

Commenter: Steve Lehtonen

Affiliation: International Association of Plumbing & Mechanical Officials (IAPMO)
Green Plumbers Training

Comment Date: November 19, 2013

Email Attachment:

IAPMO/GREEN PLUMBERS TRAINING

PUBLIC COMMENTS ON THE DRAFT WATERSENSE PROFESSIONAL CERTIFICATION PROGRAM LABELING SYSTEM

Commenter Name: Steve Lehtonen

Commenter Affiliation: International Association of Plumbing & Mechanical Officials
(IAPMO) Green Plumbers Training

Date of Comment Submission: November 19, 2013

General: In response to the September 19, 2013 cover letter to the EPA WaterSense [DRAFT WaterSense Professional Certification Program Labeling System](#), IAPMO/Green Plumbers Training offers the following comments:

We applaud the EPA for taking the steps necessary to “expand the types of certification programs that can earn the WaterSense label and extend the benefits of the WaterSense program to a larger number of certified individuals.” We are, however, disheartened by the tenuous tone in the same paragraph that indicates that the expansion to new programs will be based upon available resources. Plumbing Industry training organizations, plumbing contractors, and plumbers – eager to support and promote the WaterSense Program, have had to be patient for more than five years, due to a lack of resources at WaterSense.

We would propose that changes be considered within Sections 5, 6, and 8 of the proposed “Professional Certification Program Labeling System” that would enable WaterSense to provide program expansion, while maintaining the integrity of the program and simultaneously providing for future growth. Our proposals are included in the comments below.

Comment #1 (Section 5):

Eliminate the “Accreditation Path” in Section 5, and allow just one accreditation path, which would not be known as the “non-accreditation path” but simply “WaterSense Accreditation.” While this suggestion would not necessarily free up resources, it makes sense for the overall common good of the program and all of the entities that become accredited.

Comment #2 (Section 5):

Delay implementation of the “Adopting PCOs portion of the program (with the exception of existing adopting PCOs). This would allow New Parent PCOs to apply and become established, while building the appropriate framework for adding “adopting PCOs” in the future. New Parent PCOs could establish relationships with vendors and potential “adopting PCOS” through contracts as provided in Section 5.2.2.2. - thus freeing up WaterSense resources for the short term.

Comment #3 (Section 6.2): In lieu of delaying the implementation of “Adopting PCOs,” another option would be to place the entire burden of “adopting PCOs upon the Parent PCO. The current language creates a potential regulatory quagmire (Section 6.2):

1. The Parent PCO notifies the EPA of the *intent* to offer their labeled program for adoption.
2. The Parent PCO offers and receives an application from the adopting PCO, processes it, and accepts or rejects it.
3. The Adopting PCO is then required to submit another application to the EPA, which may or may not be accepted.
4. If accepted, the Adopting PCO is notified by the EPA, and a Partnership Agreement is then signed by the EPA and the Adopting PCO.
5. Apparently, when, and if the EPA and the Adopting PCO have signed a Partnership Agreement, then, the Parent PCO and the Adopting PCO may finalize their agreement.

It makes more sense to create a definitive burden upon the Parent PCO to assume responsibility for the activities and performance of the Adopting PCO, rather than a confusing split of responsibilities between the Parent PCO and EPA/WaterSense.

When an Adopting PCO is presenting the program of a Parent PCO, they are obligated to present the program in accordance with all of the rules that pertain to the Parent PCO’s program, ie. Intellectual property, curriculum and certification guidelines, and WaterSense requirements. For instance, If a college is presenting the Green Plumbers program (assuming that Green Plumbers is a Parent PCO), the college is a WaterSense Partner only through the relationship with Green Plumbers. If the college and Green Plumbers relationship ends, then the relationship of the college with WaterSense also

ends, but the Parent PCO will have to rely upon EPA/WaterSense to take independent action to end the relationship between the college and the EPA.

Comment #4 (Section 8):

Similar to our above comments, all reporting requirements, particularly annual program activity and statistics, should be directed to the EPA/WaterSense program from the Parent PCOs. This is especially important when considering the accuracy and reliability of the search engines and databases for specific certification programs. Allowing Adopting PCOs to manage and report on certifications locally – even if coordinated with the Parent PCO – could lead to unequal and inaccurate reporting platforms and possible duplication or missed information.

Thank you for the opportunity to present these comments, which are made in the interest of promoting effective water efficiency, and the expansion and success of the EPA WaterSense Program.

Commenter: Charles Swanson
Affiliation: Texas A&M Agrilife Extension Service
Comment Date: November 19, 2013

Email Attachment:

Template for Public Comment Submission on WaterSense Documents

Commenter Name: Charles Swanson

Commenter Affiliation: Current PCO, Texas A&M Agrilife Extension Service

Date of Comment Submission: November 18, 2013

Topic: 8.1.4 Maintain a Listing of Certified Professionals

Comment: If EPA transfers all responsibility for listing of certified professionals to the PCO. This may increase costs for the PCO to have dedicated staff and IT available to assist in maintaining a publicly accessible online list. These costs will have to be recouped through increased costs for professionals to become certified and may deter some professionals from seeking certification.

Rationale: Having professionals listed on one central EPA supported site may decrease costs for PCO's. It also provides a common listing for clientele to search for certified professionals, especially if multiple PCO's offer multiple certifications in a geographic area.

Suggested Change (or Language): EPA continues maintaining listing of certified professionals.

Topic: State Agencies & Academic Institutions being Professional Certifying Organizations

Comment: Its does not appear the specifications take into account a scenario where the PCO is a state agency or academic institution

Rationale: Parts of the specification reference the need for review by independent academic institutions or professional testing organizations perform functions related for an entity to become a PCO and offer PCO related services. If the PCO is a state agency or academic institution that has expertise in the subject matter and experience of offering related testing type services for other programs there should

not be a need to seek out additional review and services that may result in increased costs to maintain a PCO status.

Suggested Change (or Language): State agencies and recognized academic institutions be exempt from these requirement. These type of organizations already exhibit a certain standard of institutional stability. This change should not affect the requirement for an independent oversight committee for the program.

Topic:

Comment:

Rationale:

Suggested Change (or Language):

Topic:

Comment:

Rationale:

Suggested Change (or Language):

Commenter: Deborah Hamlin
Affiliation: Irrigation Association
Comment Date: November 19, 2013

Email Attachment:



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November 19, 2013

Ms. Veronica Blette
Chief, WaterSense
United States Environmental Protection Agency

Dear Veronica:

Below are the comments from the Irrigation Association regarding the draft WaterSense Professional Certification Program Labeling System and the draft changes to the three certification program specifications. As the first certifying partner of the WaterSense program, we have enjoyed our partnership and look forward to continuing the relationship as a professional certifying organization under the new labeling system.

Thank you for all you do in promoting efficient irrigation in the marketplace. If you have any questions regarding our comments, please feel free to contact me or our government affairs director, John Farner, at johnfarner@irrigation.org.

Sincerely,



Deborah M. Hamlin, CAE, FASAE
Executive Director

IA Comments re: WaterSense Professional Certification Program Labeling System

As stated in the IA's comments to the notification of intent, released by WaterSense on October 11, 2012, "the Irrigation Association supports the proposed changes to the specification as outlined. While the IA is fully committed to promoting the WaterSense program and its label in the marketplace, the IA's Select Certified certifications always

take priority. This change allows the IA to no longer have to make a choice between the CIC, CLIA, CGIA or CID versus 'WaterSense Partner' in the marketplace; these will now be one-in-the-same."

While the IA continues to support the conceptual changes, we have a few suggestions and requested clarifications before this specification is finalized:

Section 2.0 EFFECTIVE DATE

The IA supports the one-year compliance requirement outlined in the draft specification.

Section 5.0 ELIGIBILITY REQUIREMENTS FOR PROFESSIONAL CERTIFYING ORGANIZATIONS

The IA supports the inclusion of an "accreditation path" for PCOs. Ideally we would like to see third-party accreditation as a minimum standard for the program, perhaps after a three-year period.

Section 7.0 AUTHORIZATION TO USE THE LABEL

The IA has two comments relating to the use of the WaterSense label:

- 1) As a parent PCO, we would like the WaterSense program to consider that the label used by those PCOs who are adopting programs clarify which PCO's program they have adopted. This would be similar to the process used by WaterSense's labeled products program with the testing agency (ICC, IAPMO, etc.) included directly on the label. For example, if a state's licensing board wanted to adopt the IA's labeled certification, the label used on that program would indicate that it is an IA program.
- 2) With the discontinuing of the WaterSense irrigation partner program, the IA fully supports individuals, who hold labeled certifications from a designated PCO, the ability to use a WaterSense promotional logo in their marketing material. Even though these logos will no longer state that that individual is a "WaterSense Partner," many irrigation contractors use the WaterSense designation as a successful marketing tool.

IA Comments re: Revised WaterSense Specifications for Professional Certification Programs

The Irrigation Association requests that the following comments apply to all three revised specifications for professional certification programs.

Section. 2.2.1 EXAM CONTENT

Though there have been no suggested changes to this section, as programs evolve, so should the criteria. Based on certification best management practices developed by third party authorities, legally defensible exam programs should begin with a job analysis which clearly defines the knowledge, skills and abilities needed to complete a specific job. A job analysis is then the basis for the exam content outline.

If an organization has completed a valid job analysis, it should take precedence over the exam content that the EPA has outlined as a minimum to qualify for WaterSense labeling in 2.2.1. The job analysis should be submitted to the EPA as proof of completion. As with exam review, the EPA should keep this information confidential. If an organization does not have a valid job analysis they should follow the content guidelines set by the EPA.

Section 2.3.2 MAINTAINED PROFICIENCY

The IA requests the following regarding the maintain proficiency requirements:

- 1) "Water-efficient concepts" should be defined as any material or activity directly relating to irrigation concepts and principles. This can include, but not limited to, irrigation scheduling, auditing, hydraulics, installation, maintenance and backflow practices. Essentially, water-efficient concepts should include any CEUs that are directly related to irrigation, including those that are product specific.
- 2) The proposed maintenance criteria doesn't take into consideration the impact on irrigation professionals with multiple certifications. The Irrigation Association currently has four certifications, recognized by WaterSense: one under the design category, two under the auditing category, and one under the installation and maintenance category. We require a minimum of 20 CEUs every two years whether an individual holds just one or more than one certification. This new requirement to have 50 percent of CEUs in water efficiency for each category would require major changes to our program, and taken literally, could significantly increase the number of CEUs required. If this requirement were to make it into the final specifications, the IA may be limited to have only one certification labeled by WaterSense, given the changes that would need to be made.

We propose two possible options:

- a) The 50 percent requirement for water-efficient concepts be kept (given the definition suggested above), but not required in each of the three certification "auditing," "design," and "installation and maintenance" specifications. Instead, WaterSense could require 50 percent of the total, cumulative CEUs required by the PCO's program. Another option would be that the commitment need only be fulfilled for one certification, if an individual has more than one qualifying certification. OR,

- b) Set a minimum number of CEUs to be dedicated to water efficiency. Given that you have one program that only requires just two CEUs per year, and another program that requires 20 CEUs every two years (a one-to-five ratio), program demands are inequitable when a percentage is used. We suggest that a minimum number of “water-efficient CEUs” be set. As above, this would have to be based on the total CEU requirements, or just one certification, and not necessarily required for each designation someone holds. IA would support any number between four and 10 CEUs every two years, if it is based on the total CEUs required from the program – in IA’s case four to 10 water-efficient CEUs out of 20 maximum.
- 3) The IA requests that WaterSense consider a mandate for a minimum number of CEUs required for a labeled certification. Even though the IA requires 20 CEUs every two years, our recommendation to WaterSense is a mandated 16 CEUs every two years. This requirement equates to a one-day class on irrigation per year. In our estimation, this requirement provides a minimum amount of education necessary for an irrigation professional to practice water-efficient irrigation techniques, and demonstrates a firm commitment to water efficiency.

IA Comments re: WaterSense Specification for Irrigation System Designer Certification Programs

Section 2.2.1 EXAM CONTENT

The IA requests that the bullet, “Preparation of site design reflecting site requirements,” be removed and replaced with, “Preparation of irrigation design reflecting site requirements.”

IA Comments re: WaterSense Specification for Irrigation System Installation and Maintenance Certification Programs

Section 2.1 EXPERIENTIAL REQUIREMENT

The IA has launched a new certified irrigation technician exam, and is interested in applying for a WaterSense label. The content aligns with the installation and maintenance program, but the experience requirement is more entry level, at just six months. Would WaterSense consider reducing the system installation and maintenance certification program requirements to six months? Third party programs like NCCA have long thought that the exam should be the differentiator, not eligibility. We hope to have 150 new CITs in 2014.

In addition, the IA would like the EPA to consider the option of educational experience as a prerequisite for sitting for the exam, in lieu of years of experience, based on a minimum number of hours from an accredited institution. We are receiving more and

more requests from academic institutions asking to allow their students to sit for our exams. They believe if their students graduate with a valid certification, they will be more desirable in the marketplace. An example would be to have an academic option that requires four to nine credit hours plus 500 to 1,000 hours of experience, depending on the program. We have a similar program in place for the irrigation auditor program which, under the current WaterSense criteria, requires no work experience except for the independent audit.

Section 2.2.1 EXAM CONTENT

The IA requests that the bullet, “equipment commissioning,” be removed from this section. Our 2009 job analysis did not reflect that equipment commissioning is a core competence for the irrigation system installation and maintenance professional as defined in Section 4.0.

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