

MEMORANDUM

FROM: Charlie Hatcher, Commissioner
TO: Commercial Applicator Licensees/Certification Holders, TDA Pesticides
DATE: August 4, 2023
RE: Recertification Period and Renewal, 2023

In May and July 2023, the Department of Agriculture issued notices to industry and pesticide customers regarding challenges in the 2023 renewal process for pesticides recertifications. I want to reach out to you as a member of industry to update you on our progress and to lay out next steps for the renewal process going forward.

The Department is in the process of changing computer systems that record and track continuing education credits (CEUs) for pesticides certifications. Unfortunately, data conversion from the old system to the new system is experiencing problems—resulting in a delay for the Department to issue new recertifications.

To help alleviate the delay, the Department extended the time for accrual of CEUs through October 2, 2023. As we approach that deadline, I want to inform you of expected actions and plans to resolve the recertification issue this year and into the future.

- First, **the deadline for accrual of 2023 recertification CEUs is October 2**. That deadline will not be extended. Prior to October 2, the Department is committing numerous personnel solely to 1) resolve issues with the computer data conversion and 2) enter documented CEU credits as they are received. As the new system reflects adequate CEUs, the Department will be issuing current recertifications to those individuals. Please note though, operator licenses will not be renewed unless recertification is had and applicable license fees are paid in full.
- Second, after October 2 there will still be a lag for some applicators between the time CEU courses were attended and when the Department is able to receive attendance rosters and record the credits in the system. This issue occurs in the pesticide licensing program rules and will be addressed prior to 2026 recertification. However, in the meantime CEU presenters have up to 30 days to report your attendance, which means in some instances applicators who do not attend CEU courses until late September or October this year may not know if adequate CEUs were acquired until approximately 6 weeks after October 2.

Given the computer conversion difficulties and the constant influx of new CEU attendance data, the Department is not able to update applicators in real time leading up to October 2 regarding their individual CEU status. If the Department discovers

applicators after October 2 who lack sufficient CEU credits, those applicators will be required to retest for recertification and retest for any licenses that were associated with the prior certification.

Therefore, it is imperative that certification holders track their own CEU accrual to decide if additional CEU credits are required for 2023 recertification. If a certification holder doubts their personal records regarding CEUs or wants to minimize the delay between course attendance and receipt of a current recertification, it is strongly recommended that they retest for recertification in lieu of acquiring CEUs.

- Third, if a certification holder can demonstrate attendance (e.g. through course receipts), a recertification will be issued. However, it is subject to subsequent verification being submitted. If attendance rosters later show an insufficient number of CEU credits, recertification will be revoked until the applicator completes retesting.
- Fourth, if a holder acquired CEU credits after June 30, 2023, but were found later to be not required, because the holder had more than enough number of CEUs or retested for recertification, those CEU credits will be applied to recertification requirements in 2026.
- Lastly, the Department is receiving word from various operators that general posting of the October 2 extension is not sufficient in some instances for licensees to demonstrate to customers the operator's authorization to conduct commercial pest control operations. If you or your business are affected in this way, please contact the Department at 615.837.5148.

I am aware of how trying the 2023 recertification period has been for the pesticide industry, the clients they serve, and departmental employees who serve them. I am extremely grateful for the partner you are and the patience you exhibit as we work through these issues together. Please know the Department stands committed that disruptions in the marketplace not occur and that properly credentialed professionals be authorized to serve the market needs.