



pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

STATE BOARD FOR CERTIFICATION OF WATER AND WASTEWATER SYSTEMS OPERATORS

June 15, 2011

Mr. John Ackerman
Chairman
Certification Program Advisory Committee

Dear Mr. Ackerman and CPAC Members:

The State Board for Certification of Water and Wastewater System Operators (Board) has taken a careful look at the initial results of the program review you completed in January, 2011. While we agree with you that the first priority has to be to expand your evaluation and recommendations to include results from a survey of certified operators, we felt we can move forward on a number of your recommendations right away. Below is our initial response to your recommendations. We look forward to working with you to take the necessary steps to implement these recommendations and to expand your evaluation to include responses from certified operators. It is my understanding that the Department of Environmental Protection (Department) is moving forward with the survey you created for this purpose as part of the program training they are conducting in July and August.

- It appears a shift in focus from getting new people interested in the water/wastewater profession to now getting new people certified is needed.

Board Response: We disagree. The Board feels that we cannot stop an emphasis on promoting workforce development. More entry level, young non-certified operators need to be brought into the industry and properly trained and certified.

- The administration of on-line examinations needs to be resumed. Options to do this include providing the on-line examinations in the Department Regional Offices or through partnership agreements with colleges and universities. The possibility of utilizing the Approved Examination Providers to help with registration and proctoring should be explored.

Board Response: The Board recognizes the importance of resuming the administration of the examinations at a frequency to meet current demand as quickly as possible. If we are to encourage new people to join the industry, we have to provide the necessary services they need to get certified; including the administration of the examinations. We have asked the Department to compile a list of options on how to expand our capability for the administration of the examinations using on-line, or other, computer-based technologies. Consideration of costs and resource needs will have to be part of our analysis in order to determine the best alternatives for the use of on-line examinations. We will share a final draft strategic plan to expand services in this area with the CPAC members as soon as we have it developed.

- The examinations are composed of a specific number of questions that address the knowledge, skills and abilities (KSA's) needed to successfully operate a treatment system. These KSA's were categorized and their relative importance determined. In addition, the content of these

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questions have been categorized into broad topics such as math, chemistry, hydraulics, etc. Rather than spending staff time developing more comprehensive study guides, the Department should focus resources on developing the capability to provide feedback to the examinee in the results letter as to what content and categories of KSA's they did well on and what information they need to study further. This same information should be summarized and provided to training providers to facilitate the enhancement of their training in areas where the examinees are deficient.

Board Response: Agreed. With the new software that Department staff is now using to process examination results, we should be able to provide this service in the near future.

- Enhancements to the Department website are needed to make it easier to find information, possibly through links within text. The Department needs to expand its outreach efforts to emphasize the importance of the Operator Information Center webpage as the location for anything related to the Operator Certification Program. This includes examination session schedules, education & training opportunities through EarthWise Academy, documents and forms, how to find technical assistance, etc.

Board Response: Agreed. Use of the Operator Information Center webpage will be highlighted in the training the Department is delivering in July and August. We also recommend to the Department that the "Certification and Licensing Programs" website link on the left side of the main Department webpage be modified to include a link to the Operator Information Center webpage.

- Training Providers and Approved Examination Providers need the ability to access and validate client IDs for those folks who are not yet certified. They explained that folks taking training, if not yet certified, have not been assigned a client ID unless they have taken an examination and thus, training providers have no way to record the training.

Board Response: We agree that we are under an obligation to track the training taken to meet the continuing education requirements to maintain certification. However, we also feel that it is up to the operator to compile whatever information is needed to document compliance with the experience requirements for certification. If the operator wants to apply completed training as part of this experience, it is up to the operator to compile that information. The additional staff resources needed to also track this training for operators who are not certified is prohibitive.

- eLibrary is very hard to use.

Board Response: Agreed. However, the Board has no control as to how eLibrary is designed or used. What we can do is focus on ensuring the information on the Operator Information Center webpage is accurate and complete. It is our intent to continue to work with CPAC and the Department to ensure that this webpage has the necessary information an operator needs.

- The 2010 Drinking Water Operator Certification Annual Report provided to EPA seemed to jump around between Drinking Water and Wastewater. For future reports, there needs to be a clear distinction between the Drinking Water and Wastewater components of the program.

Board Response: We recommend to the Department that future annual reports for EPA be limited to the drinking water components of the program to avoid this kind of confusion in the future.

- The Department should look at topic training as a modification to current training modules rather than extensive revisions to these training modules.

Board Response: Agreed. Now that we have the ability to summarize examination results by topic area, the Department should use these results to refine the existing training modules based on these results rather than a complete revision.

We look forward to working with you as we move forward to improve and enhance the Drinking Water and Wastewater Systems Operator Certification Program.

Sincerely,



Joe Swanderski
Chairman