

Accreditation and Certification (but were afraid to ask DHS!)

The following summary is prepared by the Environmental Management program at UC Berkeley Extension in order to help our students understand this important new regulation. You must contact the California Department of Health Services (DHS) Childhood Lead Poisoning Prevention Branch for information regarding interpretation of their regulation and how it directly applies to you. This summary includes proposed revisions to the June 1994 regulation that we anticipate will be part of the final regulation.

The new DHS regulation, found in Title 17, CCR, Division 1, Chapter 8, is the first in a series of regulations designed to protect California residents from lead poisoning resulting from lead-related construction work. First, DHS addresses training and individual certification for work in public, commercial and residential buildings. (The current regulation will soon be revised to exclude the term "commercial" building but instead define "public building" as one that is generally accessible to the public. A later regulation will extend certification to industrial buildings and steel structures.) Certification will eventually become mandatory. DHS will also develop work practice regulations for inspection and lead-related construction work. At that point, several years from now, only certified individuals will be able to perform these functions and they will be required to follow very specific work practices.

WHAT DOES THIS REGULATION DO?

It provides for the accreditation of training providers and the interim certification of individuals performing lead-related construction work in residential or public buildings. Lead-related construction work involves any construction, repair, painting, demolition, renovation, and maintenance work, whereby the lead-containing material or soil could be disturbed resulting in significant lead exposure to adults or children. (Significant exposure is left for Cal/OSHA to define and is currently unclear.) Public buildings are structures generally open to the public such as stores, schools, and "any other building which is not a residential building". (A future change will include the term "generally accessible" to the public. Similar regulations will soon include steel structures and industrial buildings.)

After November 1, 1994, only training providers accredited by DHS are allowed to offer the approved training courses that are a requirement for individual certification. Continuing our tradition of being a leader in environmental management training, UC Berkeley Extension was the **FIRST** training provider in California accredited by DHS!

Individuals may obtain interim certification as one or more of the following: Inspector/Risk Assessor, Supervisor, Worker, Project Monitor, and Project Designer.

IS THIS CERTIFICATION MANDATORY IN CALIFORNIA?

Yes and No! Currently, this interim certification is mandatory in very limited circumstances. For example, some lead work funded by HUD, Title X, or other State or federal money may only be done by certified individuals. Lead hazard remediation work done in California public schools must be done by certified individuals. Other than in these circumstances, the current certification program is voluntary. We expect that many property owners will soon choose to utilize only DHS interim certified individuals because of legal liability concerns regardless of the lack of a mandatory program. Cal/OSHA expects to make certification mandatory for supervisors and workers when they release a new lead standard in late 1995. DHS is expected to mandate certification for everyone (not just consultants/contractors) sometime in late 1995 or early 1996.

HOW DO I BECOME INTERIM CERTIFIED?

DHS has established training, experience, and education requirements for each discipline. This is summarized below *and includes the proposed revisions*. Check with DHS about your individual situation and current requirements. Don't let this brief summary determine whether or not you can meet their education and experience requirements!

Training

You must take the basic course for each discipline listed below. There are some exceptions for previous training "grandfathered" by DHS. (UC Berkeley Extension courses held after July 1992 were approved for grandfathering!) After November 1, 1994, only training providers accredited by DHS are allowed to offer the approved training courses that are a requirement for individual certification. Depending on the training provider, graduates of approved courses can eliminate the introductory material covered in another course. The project design course may also be treated as a continuation of the supervision/monitoring course. (UC Berkeley Extension pioneered this practice of reducing repetition between courses.)

Inspection/Assessment: 40 hour course

Work: 32 hour course

Supervision/Project Monitoring: 40 hour course (the training requirement for both supervisor and project monitor can be met by taking this one course)

Project Design: 56 hour course (40 of this 56 hours is identical to the supervision/monitoring course)

*The following course is expected to be part of a revised regulation. This is expected by March 1995.

Certified Industrial Hygienist: 24 hour course (CIH's will be able to take this one course and meet the training requirements for project monitoring, inspection/assessment, and project design.)

Interim certified individuals will need to complete 7 hours of "continuing education" annually in order to renew their interim certification. The 7 hours is a total, regardless of the number of interim certifications an individual might possess. (This is not true for interim certified workers who must take continuing education specifically designed for workers.) Thus an individual with two certifications (except for worker) need take only a total of 7 hours continuing education from a DHS accredited training provider. We suggest taking your continuing education and re-applying to DHS at least 6-8 weeks prior to the expiration of your interim certification. DHS is allowed 120 days to process your renewal application.

UC Berkeley Extension will offer basic training courses and continuing education in all disciplines except worker. (We may offer worker training on a contract basis sometime in the future. Continuing education training will begin in the Fall of 1995.) Check your UC Berkeley Extension brochure for course dates!

Experience and Education

Inspector/Assessor: one year experience as a lead-related construction supervisor or one year experience conducting inspections and assessing health, safety, or environmental hazards; education requirement includes at least two years postsecondary education in biological, chemical, or physical science, or a related field, or a high school diploma and additional experience substituted on a year for year basis for the postsecondary education

Worker: no experience or education required other than the basic worker training course

Supervisor: no education requirement, but must have 1 year lead-related construction experience as a worker or two years in building trades conducting health, safety, or environmental hazard control

Project Monitor: one year experience as a lead-related construction supervisor or in conducting or monitoring health, safety, or environmental hazard reduction projects; education requirement is similar to Inspector/Assessor.

Project Designer: similar experience and education requirements as project monitor

CONTACT DHS FOR EXACT REQUIREMENTS!

Application Process

1. Determine if you wish to obtain DHS interim certification and if you meet the requirements for education and experience. (Clarify any questions with DHS before you decide!)
2. Take the basic training courses needed from a DHS accredited training provider. If you pass the course, you will be given a DHS Course Completion Form.
3. Obtain an application for interim certification from DHS.
4. The application will ask you to submit one page from your Course Completion Form to prove you attended an approved course from an accredited training provider.
5. Complete the rest of the application documenting experience and education.
6. Submit the completed application to DHS with \$75 for each certificate you request.

Be aware that DHS is swamped with applications and it may take up to 90 days to process an application and grant interim certification.

WHY IS IT CALLED "INTERIM" CERTIFICATION?

Sometime in 1996, DHS anticipates requiring interim certified individuals to pass a California State exam. Once an individual passes the exam, he or she becomes fully certified.

WHAT ABOUT THE EPA AND THEIR ACCREDITATION?

The EPA has recently released a draft model accreditation plan for lead. This plan differs in some respects from the California program. The California program is expected to be approved by EPA and thus the EPA model plan will not be implemented in California. The EPA plan will only become relevant in 1996 for states that do not already have an accreditation/certification program! (It is not clear yet how California certified individuals will be treated in other states. California is far from alone in this problem. Most East Coast states have their own certification programs and only some allow transferring training/certification from state to state.)

MORE QUESTIONS?

Call the California Department of Health Services hotline at (510) 450-2447. You will be asked to leave a message, but they call back within one or two working days. We suggest you leave a specific message.

REMEMBER, IF YOU HAVEN'T TAKEN PREVIOUS TRAINING APPROVED BY DHS FOR GRANDFATHERING, ALL DHS INTERIM CERTIFICATION BEGINS WITH ATTENDING A DHS APPROVED COURSE FROM AN ACCREDITED TRAINING PROVIDER. UC BERKELEY EXTENSION IS A LEADER IN LEAD PAINT TRAINING AND WAS THE FIRST ACCREDITED TRAINING PROVIDER IN CALIFORNIA! BE AWARE THAT UC BERKELEY EXTENSION TRAINING MAY BE MORE SOPHISTICATED AND REQUIRE BETTER READING SKILLS THAN SOME OTHER TRAINING PROVIDERS. PLEASE CALL OUR OFFICE AT (510) 643-7143 IF YOU ARE CONCERNED THAT OUR COURSES MAY NOT BE APPROPRIATE FOR YOU OR YOUR EMPLOYEES. PLEASE LOOK IN YOUR ENVIRONMENTAL MANAGEMENT BROCHURE FOR COURSE DESCRIPTIONS, DATES AND TUITION.