



# CTAG

Certification & Training Assessment Group — National Partnerships for Safe & Effective Pesticide Management through Education, Training & Competency Assessment

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## Direct Supervision: Summary of Survey Results

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There are no criteria or provisions set forth in FIFRA defining the practice of a non-certified person engaged in the application of pesticides while under the direct supervision of a certified pesticide applicator. Many States have defined this activity by statute, regulation, or policy, and some states have established certain limits with regard to the direct supervision of pesticide applications. The criteria or requirements defining direct supervision differ substantially among states. CTAG surveyed pesticide regulatory programs to determine, in the programs where direct supervision of pesticide applications is not prohibited, the scope and criteria defining the direct supervision of non-licensed/non-certified pesticide applicators by licensed/certified pesticide applicators. While the results of the survey indicate a variety of interpretations of direct supervision, there were some noteworthy trends among the responses of the participating 46 state programs.

- Most programs (91%) allow for a certified applicator to directly supervise pesticide applications performed by non-certified persons.
- In states where allowed, the majority allow direct supervision for both general use pesticides and restricted use pesticides.
- Only four states have limitations placed on direct supervision based on pesticide use classification (i.e. on site supervision required), and in only one case is direct supervision not allowed (for RUP applications in ND).
- The majority of states allow direct supervision by commercial and private applicators, and many responses indicate that all certified applicators are allowed to directly supervise.
- The majority of programs (91%) reported no defined numerical limit regarding how many non-certified persons are allowed to be supervised by a certified applicator.
- Only 23% of responses indicated other training or experience requirements for supervisors beyond certification.

Many programs indicate defined criteria to determine the limits of direct supervision.

- The criteria of time and/or physical distance are the limiting factors comprising the majority of responses (84%).
- The criteria of pesticide signal word or active ingredient are also occasionally used to place limitations on direct supervision.

Many programs responded that other criteria are used to determine the limits of direct supervision.

- While three responses indicated that direct supervision requires that the supervisor is physically present and within immediate voice and/or visual contact, the majority of these responses seemed to indicate that direct supervision is defined in a general manner.
- While in some cases it appears that the program has no formal definition of direct supervision or the criteria to define it, other responses seemed to indicate a specific caveat to an otherwise broad definition of direct supervision (training requirements for supervisors, liquid termiticide must be applied by or in the presence of WDO certified applicator, etc.)
- Many programs provided the specific regulatory language related to direct supervision, particularly the programs that utilize a broad definition. The language was very similar in many cases. In general, these programs indicate that direct supervision would typically require that the uncertified person carry out all applications under specific written or oral instructions from the certified applicator, who shall be responsible for the actions of all persons supervised. While the certified applicator is typically not required to be present at the time of the application (unless otherwise required by the product label), the certified applicator (supervisor) must be available if needed within a reasonable time through conventional means of communication.

Note: One question on the original direct supervision survey was determined to be vague and the answers to this question were omitted from this final summary of survey results. This survey question asked if direct supervision is determined by the category in which the applicator is certified (in a particular state or program). Due to the nature of the responses, it was clear that this question was interpreted in several different ways by survey participants. Therefore the responses to this question were not considered when composing this summary. Further clarification of this particular component of direct supervision may be warranted in the future.