



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 17 1987

OFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Completing Regional Review of Courses Submitted  
Under the AHERA Model Accreditation Plan

FROM: Michael M. Stahl, Chief *Michael M. Stahl*  
Hazard Assistance Abatement Branch  
Chemical Control Division

TO: Regional Division Directors  
Regional Branch Chiefs  
Regional Asbestos Coordinators

This memorandum encourages the Regions to complete over the next couple weeks the review of training course materials submitted for Agency approval under the Asbestos Hazard Emergency Response Act (AHERA) Model Accreditation Plan to assure initial publication in the Federal Register. Regional course recommendations must be received by Headquarters no later than Friday, October 2, 1987, to ensure course inclusion on the initial Register list.

Part I of this memo will identify several suggestions to help you complete Regional course reviews, particularly in the short run. Part II will provide further clarification on issues raised by various regions regarding what is admittedly a complex course review and approval process, outlined in two previous memoranda on AHERA accreditation provided to the Regions on June 22, 1987, and on July 24, 1987. Discussion will include the use of various review forms we have provided.

First, I want to commend the Regions that have already taken a variety of actions to promote course submittals and expedite reviews. Training vendors are very anxious for rapid Agency approval and we acknowledge and appreciate your efforts to accommodate them. This week we will return, under separate cover, our concurrences on most of the courses the Regions have provided to us so far. Please keep them coming.

At Headquarters, we pledge to concur with Regional course recommendations (as long as all materials required by the Model Plan have been provided by the applicant and submitted to us) by phone within a week of receipt, and in writing immediately after, so as not to delay the issuance of your approvals. Karen Hoffman (FTS 382-3949) will manage this process.

PART I: COMPLETING COURSE REVIEWS

We are asking the Regions to complete course reviews this month to maximize the number of approved courses which the Agency will publish in its initial Federal Register list, required periodically by AHERA to demonstrate EPA's performance in approving training courses for AHERA accreditation purposes. The initial list will be published in conjunction with the final AHERA Asbestos-Containing Materials in Schools Rule, due on October 17, 1987. This means that we must concur on your course approval recommendations no later than Friday, October 2, 1987, to ensure course inclusion on the list. In order to get the AHERA inspection and management plan process off to a good start, each Region should attempt to complete as many course reviews as possible for the first Federal Register list.

The following guidelines will help maximize course reviews and expedite approvals in the next couple weeks.

- Complete interim approvals for center and satellite supervisor courses.

Since all of these EPA-funded supervisor courses have used the EPA model supervisor course as a basis and included examinations, we at Headquarters are willing to grant them interim approval at Regional request without review of the materials. In other words, if the Regions believe, as we suspect, that these courses are substantially equivalent to the Model Plan, no further review of materials is required by Headquarters. Advise us of your recommendation.

- Consider previous attendance as an audit for upgraded center and satellite supervisor courses and other new center and satellite courses.

Regions may use previous attendance at centers and satellites to satisfy the audit provision for full approval recommendation and skip the contingent approval step.

- Focus on contingent approvals.

Many applicants have developed acceptable course designs and materials, but will not present an opportunity for immediate course audit. If the course materials are sound and complete, the Regions can offer contingent approval -- approval "contingent" on a satisfactory on-site course audit. The Regions are not wise to withhold contingent approvals in those instances where courses have been offered recently but the Region was not able to do an on-site audit of that course. This situation leaves applicants without any EPA recognition through no fault of their own. As we would like to include as many courses in the initial Register, Regions are encouraged to use the contingent approval option over the full approval option.

• Solicit State contractor accreditation programs.

The Regions are encouraged to solicit applications for State contractor accreditation programs, particularly from those States which have existing programs which might already qualify under AHERA Model Plan standards. Several State approvals are possible before Friday, October 2, 1987.

EPA approval of State contractor accreditation programs is the cornerstone of the AHERA accreditation process. Discussions with responsible officials from States on the Model Plan requirements will help them modify or upgrade current programs to manage the accreditation process in their States, as AHERA intended. Further, any course approved by a State granted EPA-approval for its program is automatically approved for EPA purposes, which means fewer courses for Regional review and approval.

• Offer approvals for interim accreditation (i.e., "grand-fathering" previously-trained persons)

The Regions should utilize the interim approval process, particularly for supervisor and worker courses. Interim approvals should be offered to courses which have trained persons in the past in a manner substantially equivalent to the Model Plan.

When Regions solicit materials for review from an applicant that has been offering substantially equivalent training since January 1, 1985, they should ask both for (1) new materials for contingent or full approval in the future and for (2) previous materials for interim approval purposes. For example, Georgia Tech would wish both interim approval for all its attendees who have attended training and taken exams since 1985, and also contingent/final approval for its present or upgraded materials.

The interim approval process is essential to immediately providing adequate numbers of accredited supervisors and workers. Interim approval lasts for a year after a State contractor accreditation program is approved.

• Train AARP personnel to help.

Regional inspectors and technical assistants hired through the American Association of Retired Persons (AARP) can be quickly trained, in accordance with the Model Plan with this and previous AHERA accreditation memoranda, to help Regional EPA staff expedite training course reviews. Now that most ASHAA activities have subsided for the remainder of FY 1987, Regional Asbestos Coordinators may wish to designate AARP training course review coordinators to assist in course review and recommendation and handle approval processing upon Headquarter concurrence.

Again, the initial Register list of AHERA accreditation course approvals, which will require your inputs by October 2, 1987, are an important component of successful implementation of AHERA. It is in our best interest to ensure that this list, which will include full, interim and contingent approvals, is as comprehensive as possible. (Remember: course reviews, approvals and audits are also a new "reporting-only" measure for the FY 1988 Strategic Planning and Management System, SPMS, to be reported for the first time in January 1988.)

## PART II: THE COURSE REVIEW PROCESS

The AHERA accreditation course review process is extensively detailed in the Model Accreditation Plan and in the two previous memoranda, cited above. In this part, we will clarify a misunderstanding regarding the nature and timing of "contingent" approval and summarize the course review process, which should clarify key steps. Please continue to consult the earlier memoranda; they contain the basic information which is essential to course review and approval.

We understand that some Regions have been offering preliminary approvals, sometimes mischaracterized as "contingent," based solely on course outlines or otherwise incomplete submissions from applicants in an effort to expedite review and approval. While we appreciate the intent of this effort, no approval -- full, interim or contingent -- is appropriate under the conditions of the Model Plan until the applicant has provided all the materials specified by the Plan for review and until Headquarters has offered concurrence with the Region's recommendation. Please withhold Regional approval until we can concur. As noted earlier, we pledge to concur within a week of receipt of course materials and the Regional recommendation.

### 1. Overview

As stated in my June 22, 1987, memorandum, the Regions are being asked to conduct training course review and audit, make recommendation of approval (final, contingent or interim) to Headquarters, and, upon Headquarters concurrence, issue the appropriate approval to the training applicant. Attachment A includes a chart summarizing the process.

### 2. Criteria

The Regions must review training course requests for EPA approval in accordance with criteria established in the Model Accreditation Plan. The information below is required from the applicant by the Plan before review can be properly conducted,

before a course recommendation may be offered to Headquarters, before Headquarters can offer a concurrence, and before approval may be issued by the Regions.

- (1) The course sponsor's name, address and phone number.
- (2) A list of any States that currently approve the training course.
- (3) The course curriculum.
- (4) A letter from the training course sponsor that clearly indicates how the course meets the Model Plan requirements.
  - (a) Length of training in days.
  - (b) Amount and type of hands-on training.
  - (c) Examinations (length, format, and passing score).
- (5) A copy of all course materials (student manuals, instructor notebooks, handouts, etc.)
- (6) A detailed statement about the development of the examination used in the course.
- (7) Names and qualifications of course instructors. Instructors must have academic credentials and/or field experience in asbestos abatement.
- (8) Description and an example of numbered certificates issued to students who attend the course and pass the examination.

### 3. Forms for Headquarters Concurrence

To facilitate the review, concurrence and approval process, we are providing two forms which should be used by the Regions.

The first form is the Checklist attached to my July 24, 1987, memorandum. It should be used for two purposes: (1) to review written course material submitted by the applicant and (2) to document the course audit by Regional personnel. In both cases, the Checklist will help ascertain that all major course topics are covered, first in the review of materials and secondly in the classroom (if required by the Regions for full approval).

For contingent approval, a copy of the Checklist used for course material review should be submitted to Headquarters for concurrence along with the required course materials and your recommendation. The course audit Checklist must be provided later, after audit has been completed, for Headquarters concurrence on final approval.

The second form, the Application Review Form (Attachment B to this memorandum) should be used to ensure that a complete application package, in full compliance with all the information requirements of the Model Accreditation Plan (listed above), has been received from the applicant. A copy of the Form should also be sent with the course materials to Headquarters to expedite concurrence.

After making certain that all of the materials required by the Model Accreditation Plan have been received from the applicant (Application Review Form) and that the course materials are up to standard (Checklist), the Regions may recommend approval to Headquarters for individual training courses. Again, please remember to include with your recommendation the two forms and all the information specified in the Model Plan.

Unless the information required by the Model Plan is not provided by the applicant (as documented on the attached Form, completed and submitted by the Region), we expect to concur with the Regional recommendation. Headquarters staff involvement will ensure consistency in the review process nationwide among the Regions. As a Regional approval is issued on behalf of EPA, such approvals are valid in all other Regions.

The Regions, upon receiving Headquarters concurrence, issue the appropriate approval, in accordance with the model letters included in the July 24, 1987, memorandum.

#### 4. Disapproval and Revocation

The Regions, of course, have an obligation to disapprove an application whenever all required information is not provided by the applicant or if the course materials, in your judgment, are not up to standard. We imagine that the Regions will continue to work with the applicant to complete or upgrade the application as necessary to achieve a recommendation of approval. Headquarters does not need to concur on these disapprovals.

The Regions may also revoke a previously-issued course approval. Before this is done, however, concurrence from Headquarters is required. The Regions should provide a memorandum,

specifying the reasons for revocation, to Headquarters ("attention: Karen Hoffman"). After Headquarters concurrence with the Regional recommendation, the Regions may issue a letter of revocation to the trainer along with reasons for the action.

Again, it is not advisable for the Regions to offer any course approval, in writing or otherwise, before Headquarters concurrence. Such "preliminary" approvals are not envisioned by the Model Plan and will tend to leave the course applicant under the false impression that the application has been "approved" on the basis of an incomplete or substandard submission. It may also require the Agency to revoke approval, upon completion of the full review, recommendation and concurrence process.

#### 5. Types of Approvals

AHERA approvals are divided into three categories, which will be included on the Register list:

- ° Interim approval, for previous or existing courses (particularly supervisor and worker courses) which are substantially equivalent to the new Model Plan. All center and satellite supervisor courses should receive interim accreditation. Some of these courses could also receive contingent or full approval, if they fully meet the criteria of the Model Plan.
- ° Contingent approval, for all new courses in which the course design and materials are acceptable, but which will require and have not yet received an on-site course audit for full approval.
- ° Full approval, for all new courses in which the course design and materials are acceptable, and an on-site course audit has either been conducted or, under special circumstances, been waived.

Regions should offer "contingent" approval for training courses that have acceptable written materials and have not yet been (but will be) audited. Retroactive full approval is later offered to these applicants after satisfactory audits.

We hope this memorandum helps clarify the AHERA accreditation course review and approval process. We are relying on the Regions to take actions necessary to ensure that as many acceptable courses as possible are solicited from the centers, satellites, States and other vendors; reviewed, audited (when possible and desirable) and recommended for approval by the Regions; submitted to Headquarters for concurrence; and, finally, issued an appropriate approval by the Regions.

If you have further questions, Dave Kling, Bob McNally or Karen Hoffman at FTS 382-3949 are available to discuss them.

Attachments

cc: Larry Culleen  
Bob McNally  
Karen Hoffman  
Dave Kling

ATTACHMENT A: Overview of the AHERA Accreditation  
Course Review and Approval Process

STEP 1  
Submission

Applicant provides all information specified in the Model Plan to the Region for appropriate approval.

STEP 2  
Regional  
Review

Region reviews all information.

- Application Review Form to ensure all necessary materials are included.
- Checklist to ensure scope and quality of written materials.
- Checklist (audit) to ensure scope and quality of class instruction.

STEP 3  
Regional  
Recommendation

Region recommends appropriate approval.

- Interim Approval
- Contingent Approval
- Final Approval

STEP 4  
Regional  
Submission  
to HQ

Region sends its recommendation, along with copy of all information required by the Model Plan, the Application Review Form, Checklist on written materials and, if appropriate, Checklist of audit to Headquarters.

STEP 5  
Headquarters  
Clarification  
(If necessary)

Headquarters may call Region for clarification or request missing information.

STEP 6  
HQ Concurrence

Headquarters concurs with the Regional recommendation of approval by telephone within one week of receipt of course materials and in writing shortly afterward.

STEP 7  
Regional  
Approval

Region issues appropriate approval.

ATTACHMENT B: Application Review Form

(To be included with each submission of course materials and Regional letter of recommendation).

Name of training course \_\_\_\_\_

Address \_\_\_\_\_

Phone No. \_\_\_\_\_

Name of Course Sponsor or Contact \_\_\_\_\_

Course

Abatement Contractor Course

Abatement Worker Course

Inspector/Management Planner Course

Inspector Course

Abatement Project Designer Course

An audit of the course by Region.

A list of any states that currently approve the training course.

The course curriculum.

A letter from the training course sponsor that indicates how course meets the Model Plan requirements for:

\_\_\_\_\_ a) length of training in days

\_\_\_\_\_ b) amount of type of hands-on training

\_\_\_\_\_ c) examinations (length, format, passing score)

\_\_\_\_\_ d) topics covered in the course

Copy of course materials (student manuals, instructor notebooks, handouts)

Detailed statement about the development of the information used in the course.

Names and qualifications of course instructors (including academic credentials and/or field experience in asbestos abatement).

Description and example of numbered certificates (with student's name, date of exam, expiration date).