

PUBLIC COMMENT SUBMISSION ON DRAFT WATERSENSE PROFESSIONAL CERTIFICATION PROGRAM LABELING SYSTEM

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Topic: 5.2 Eligibility Requirements for EPA Approved PCOs

Comment: Our review team had some concerns regarding the inclusion of an accreditation path vs. non-accreditation path.

Rationale: Two key concerns were expressed:

- 1) Inclusion of an accreditation path is a positive move if the objective is to credibly increase professionalism. However, to our knowledge no irrigation professional certifying organizations currently meet the accreditation path requirements. Inclusion of an accreditation path may elevate the WaterSense program on paper, but does not actually increase professionalism of irrigation service providers who are certified by PCOs.
- 2) Though to our knowledge no irrigation professional certifying organizations currently meet the accreditation path requirements, by including this section in the specifications at this time the WaterSense program is raising the specter that a PCO may soon undertake the exorbitant cost of becoming a WaterSense PCO under the accreditation path. If any of the PCOs make the commitment to accreditation it may lead to the eventual exclusion of worthy PCOs that do not have the resources to undertake accreditation.

Suggested Change (or Language): Eliminate section 5.2.1 Accreditation Path and retain only section 5.2.2 Non-Accreditation Path. It is our review team's opinion that there is sufficient rigor in section 5.2.2. to uphold the quality of the WaterSense label.

Topic: 5.2.2.6 Security of Assessment Instruments

Comment: Please add clarifying language regarding who is allowed to administer the exam.

Rationale: Our review team was confused by the language in this section and asked WaterSense staff for clarification of the intent. We received this reply, "WaterSense requires that the person administering the test is different from the person training the professionals or the person proctoring the exam. The person we really call out here that must be different is the test administrator. The trainer and test proctor can be the same person."

The practice of having the trainer and test proctor as the same person is contrary to best practices for certification. Examples include the American Backflow Prevention Association

certifications “An ABPA Proctor is a person who administers the written and / or performance examinations. The Proctor will be appointed by the Administrator for a specific examination. The Proctor shall not have a private or personal interest sufficient to influence or appear to influence the objective exercise of the Proctor’s official duties.”
<http://www.abpa.org/?page=Proctor>

Here is the problem: the PCO is always judged on their effectiveness by the percentage of students that pass the exam. Therefore; the organization that does the training has motivation to improve the pass/fail ratio. There are subtle and not so subtle ways the proctor might improve pass/fail ratios, and sometimes unintentionally. In contrast, the proctor and the test scorer are not judged by the pass/fail ratio - for their task is only to administer and score the exam.

Where the PCO, and specifically the trainer, is also proctoring the exam there is clearly a private or personal interest sufficient to influence or appear to influence the objective exercise of the proctor’s official duties. Keeping a separation of duties assures that all parties are free of any conflicts of interest. This best practice enhances the integrity of any certification exam process, and will enhance the credibility of all WaterSense PCO.

Suggested Change (or Language): The PCO shall have procedures in place to ensure that exams are ~~administered~~proctored by an independent academic institute, a professional testing organization, professional test administrator, or a professional certified in the subject matter not involved in the training.

Topic: 8.1.5 Follow the WaterSense Program Mark Guidelines

Comment: Change of partnership status for irrigation professionals and new labeling instruction is somewhat unclear.

Rationale: The change seems to decrease the value of WaterSense labeling to the individual and increase the value of WaterSense labeling to the PCO.

A professional who puts forth the effort (and money) to complete a certification course should be able to use a label, like the one pictured below, that has value. The association with a certifying body offers the desired credibility. By replacing WaterSense Partner label with the WaterSense promotional label, the number of individuals completing the certification process could diminish. The objective is to elevate the skill level of the professionals in the industry and offer a means to promote their achievements.

Suggested Change (or Language): It is rather irregular to provide labeling examples within a specification, but in this case a picture may be worth a thousand words. If we interpret the language in the specification the certified irrigation professional must not use the WaterSense partner mark and now may only use the pictured mark on their business card or website:



If the label pictured above is indeed allowed, the change would uphold the value of labeling to the individual as well as increasing the value of labeling to the PCO. The present language did not make clear the value to both parties.

Topic: 8.2. Responsibilities Regarding Adopted Programs

Comment: Our review team appreciates the clear language delineating the relationship between the Parent PCO and Adopting PCO in regard to WaterSense labeled certification.

Rationale: The language in section 8.2 focuses on requirements to assure that the quality of WaterSense labeling is retained without specifying other aspects of any agreement between a Parent PCO and Adopting PCO.

Suggested Change (or Language): None.
