

Background Information: Iowa's Operator Certification Program External Review Process

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In February of 1999, the US Environmental Protection Agency published "*The Final Guidelines for the Certification and Recertification of Operators of Community and Nontransient Noncommunity Public Water Systems*," which is available at: <http://www.gpo.gov/fdsys/pkg/FR-1999-02-05/pdf/99-2692.pdf>.

This document serves as the minimum program requirements for a State's Drinking Water Operator Certification Program. One element of these requirements was program review in which EPA asked for two different types. The first is an internal review, an assessment done by the program and Iowa stakeholder input. The second review, or an external review, is suppose to be done every five to seven years by an outside, third party assessor who has no stake in the outcome of the report.

Every state program does a yearly internal report to EPA, as well as stakeholder influenced strategic planning. However, more than a decade had past since the "Guidelines" had been put in place and no state had done a true "external review." States were struggling to find the proper tools in order to fulfill this requirement. Out of this need came the "*Association of Boards of Certification's (ABC) Model Standards for the Administration of a Drinking Water and Wastewater Treatment Certification Program*" or commonly referred to by State OpCert Programs as the "*Model Standards*."

ABC's *Model Standards* are a comprehensive industry resource, designed to assist certifying authorities in reviewing, benchmarking, and improving their certification programs by identifying operator certification best practices and aligning them to national certification standards. The *Model Standards of Operator Certification* was authored by a group of industry stakeholders – operators, certification officers, regulators, national industry associations, and trainers. The document has been peer-reviewed by stakeholders representing state and provincial certification programs, oversight authorities, and other industry associations across the United States.

The industry-developed *Model Standards* provide a benchmark for what a first-tier program should strive toward to best produce and support professional, quality operators. States now had a Standard to assess their program's content and now had a tool to assist in the "external review" process. Staff from Iowa's Operator Certification Program participated in the National industry committee that developed these standards and volunteered to be the first state to go through an external review process.

The point of an external review is to use an assessment team that had no stake in the outcome of the report. Therefore, ABC created the *Model Standards Conformity Assessment Service* to assist operator certification authorities in critically reviewing their programs against the industry standards embodied in the *Model Standards of Operator Certification*.

This Assessment service consisted of two team members who carried out Iowa's review. The first reviewer was an industry "Subject Matter Expert," Mike Wentink of Nebraska. Mike was ideal because he has been an Operator Certification Administrator and trainer for over twenty years; he has an extensive knowledge of the history, issues and key components to the implementation of both an Operator Certification Program and the Drinking Water Program. The second team member was Gavin Moore, ABC Certification Administrator. Gavin had been the research assistant, documentarian and chief communications facilitator during the entire three year development of the *Model Standards*.

Iowa's review consisted of two parts with the first being review preparation; documentation that the review team requested prior to the actual exercise. This preparation exercise, according to IDNR staff, ended up being the most beneficial aspect of the review. They were asked to show documentation of rules, policies, and SOPs that were currently being used. The second part consisted of the Assessment team members coming to the program's office and interviewing staff. The entire physical review lasted one and a half days. The second half-day consisted of multiple questions raised by the first day's activities.

A few weeks later, Iowa was forwarded the assessment report. The layout of the document was as follows:

- Introduction/ History of Model Standards
- General Comments on Iowa Program
- Twelve Recommendations for Iowa's Program
- Individual Standards
- Brief description of what Iowa does
- Did they conform to the "Model Standards?"
- Recommendation for Program Change

A link to "*Iowa's Assessment Report*" and the "*Association of Boards (ABC) of Certification's Model Standards for the Administration of a Drinking Water and Wastewater Treatment Certification Program*" can be found at <http://www.iowadnr.gov/InsideDNR/RegulatoryWater/Certification/WaterWastewaterOperators.aspx>.