



**AARST Comment on
EPA Notice “Voluntary Criteria for Radon Credentialing Organizations”
November 13, 2017**

Background – AARST and Credentialing

The American Association of Radon Scientists and Technologists (AARST) is pleased to comment on the EPA’s plan to establish voluntary criteria outlining a standard of competence for organizations that credential radon service providers, as published in “Voluntary Criteria for Radon Credentialing Organizations,” Docket ID EPA-HQ-OAR-2017-0430, at 82 FR 39993-39997 on August 23, 2017. AARST is a nonprofit, professional organization of members who are dedicated to the highest standard of excellence and ethical performance of radon measurement, radon mitigation and transfer of radon information for the benefit of members, consumers and the public at large. Founded in 1986, AARST is a 501 (c)(6) membership association that does not receive federal funding or grants.

Since 2005, the AARST Consortium on Radon Standards has administered and maintained committees of volunteers from diverse stakeholder groups to create and maintain 12 national consensus radon standards. The AARST Consortium’s standard-building process is achieved through stakeholder consensus, public review and ANSI approval. Its standards are recognized by various States and governmental agencies as approved standards of practice for radon detection, measurement, mitigation, radon resistant new construction and devices. In recent years, EPA has supported the administrative work of the AARST Consortium.

AARST has a 12-year record of leadership in administering the National Radon Proficiency Program (NRPP), assuming solo ownership of the program in 2012 after jointly administering it with the National Environmental Health Association from 2005 to 2012. Today NRPP is the nation’s largest radon professional credentialing program with close to 3000 active certifications. Among other requirements, AARST-certified personnel must complete a comprehensive initial training course, pass a rigorous competency exam, perform regular quality assurance procedures, submit proof of annual instrument calibration and performance evaluations, fulfill relevant continuing education requirements, and renew their certification every two years. It should be noted that more than two decades ago, AARST was actively involved in developing the credentialing entity known today as the National Radon Safety Board. The NRPP and the NRSB are the two credentialing programs that were officially recognized by the USEPA as equivalent to the EPA’s discontinued certifying program which was known as the Radon Proficiency Program (RPP).

In 2016, in its ongoing pursuit of excellence for the organization and the profession it represents, AARST’s Board of Directors made a commitment to pursue ISO 17024 accreditation for the NRPP. For AARST, restructuring NRPP using the ISO 17024 approach will provide a heightened level of accountability and impartiality and is a natural progression that ensures that NRPP will remain a leader

for the profession. Key personnel including the AARST Executive Director and the NRPP Policy Advisory Board (PAB) chairperson, have completed the applicable American National Standards Institute training “Personnel Certification Accreditation Workshop.” AARST has compared current NRPP documents, practices and systems with ISO 17024 requirements, and determined that developing the Jobs Tasks Skills Analysis (JTSA), certification scheme, and management system for the NRPP application to ANSI could be completed in 18 months. AARST intends to continue to work toward its own ISO 17024 accreditation for NRPP: the EPA credentialing notice merely affirms the organization’s move in this direction.

The Presenting Issues and EPA’s Proposed Approach

The EPA’s voluntary, low-cost indoor radon program has been administered through collaborative work with State and Tribal programs through the State Indoor Grant Program (SIRG) supported by private industry overseen by a mix of State licensing and private certification programs. It is a success story, one clearly oriented to Main Street USA, which relies on EPA leadership and infrastructure.

The serious work of measuring and remediating this radioactive hazard relies on a skilled and certified workforce of American radon professionals working with and in the housing sector. The National Radon Action Plan calls for mitigation of five million homes to make them safe from high radon levels by 2020, saving at least 3,200 lives. Yet the growth of radon risk reduction is stalled due to the lack of a qualified workforce in some states and regions. The problems that the EPA action under consideration addresses in the notice are considerable:

- (1) there are no competency requirements for an individual to perform radon work in 30 states with a combined population of 188 million persons, representing more than 2/3 of the nation’s population;
- (2) there are no nationally applicable minimum requirements for radon personnel certification and licensing programs;
- (3) the absence of a process for federal recognition of qualified credentialing bodies restricts trade and inhibits fair competition among credentialing providers; and
- (4) the overall lack of structure and resultant confusion exposes the public to personnel who are not subject to standards or proficiency requirements.

AARST supports EPA’s decision to require accreditation under the standard ISO 17024 *Conformity assessment: General requirements for bodies operating certification of persons*. This business-oriented solution will benefit the radon industry, States, and the public if EPA provides the optimal level of leadership in defining a personnel certification scheme.

New EPA action on credentialing is not a radical change but rather a continuation of Congressionally directed policy intended to ensure that consumers have access to a proficient and qualified workforce of radon professionals nationwide. A requirement for adherence to the ISO 17024 will allow EPA, along with stakeholders, to provide key leadership in defining certification while relying on accessible and existing accreditation agencies in a viable public-private partnership and the clearly defined consensus radon standards that cover all aspects of radon measurement and mitigation.

A key advantage of EPA’s building the next generation of radon proficiency evaluation on the ISO

17024 is that it will increase uniformity where consistency is needed – in the naming and scoping of jobs and tasks and most importantly minimum thresholds of required skills and competency. By rejecting a federally controlled proficiency system, EPA is leveraging readily available private sector systems of accreditation standards with the quality assurance on which States can rely in referring consumers to well-qualified radon service providers with confidence.

Recommended General Principles

AARST encourages EPA to consider the following principles in its ultimate decision on credentialing bodies and in implementing that decision:

- 1) *Existing credentialing bodies need a fair transition process and timeframe.* As the administrator of a currently recognized credentialing body that affects more than 3,000 radon professionals, AARST respectfully requests that EPA ensure that the organization and its constituents will not experience delay, down-time, excess cost, or other hardship in connection with a transition from the current situation to an EPA-led credentialing body evaluation process.
- 2) *Public health requires accountability and consequences for problematic practices.* Radon exposure is dangerous. A mistake by an unqualified person can cause a deceptively low radon test result or release additional radon into the home. The new structure must ensure that training programs are rigorous and cannot bestow radon “certificates” upon persons inadequately prepared to provide radon services, and that ineffective professionals cannot continue to provide radon services.
- 3) *Public health requires quality assurance and quality control with uniform oversight.* Mismanagement by unqualified professionals who are measuring or mitigating low-level ionizing radiation is a danger to the public. The use of devices that measure and detect radon gas must have a certification system that provides oversight and assurance to the public that devices are accurate, calibrated and subject to quality assurance and control.
- 4) *Consumers deserve a clear and reliable way to access qualified personnel.* EPA and all States should provide unambiguous information, with affirmative recommendation, about how to find personnel certified by qualified credentialing bodies.
- 5) *The system for evaluating certification bodies must be applicable nationwide - to all entities that credential personnel in all States.* The ISO 17024 accreditation process is fiscally and legally attainable by any certification or licensing program that has a goal of attaining professional proficiency and excellence based on consensus standards.
- 6) *Radon risk reduction needs increased geographic coverage.* Nation-wide application of the ISO 17024 can help accomplish this.

EPA’s Role with ISO 17024 Program-Related Components

Radon gas and its decay products are radioactive and constitute a significant public health risk. Radioactivity requires properly trained persons to measure and mitigate in homes and other buildings. In order to prevent fraud and endangerment, AARST recommends that the EPA Indoor Environments Division continue its leadership role by supporting the development, recognition, and maintenance of voluntary consensus standards of practice. Similarly, in order to ensure the validity of proficiency criteria for professionals engaged in radon services, the agency should recognize and identify publicly

the public and private certification bodies that comply with accreditation under ISO 17024, the consensus standard for accreditation of personal certification bodies.

Of the list of options published in the Federal Register notice, AARST strongly recommends an Enhanced Option (a)¹ that will empower a strong and sustainable public-private partnership that ensures a uniform approach across credentialing bodies and the nation to protect public health and safety. AARST believes that EPA recognition of ISO 17024 credentialing bodies will be fortified by the expectation that the credentialing body sign a Memorandum of Understanding (MOU) with EPA agreeing to use the basic framework and incorporate baseline requirements into its certification scheme and process.

The enhancements to Option (a) that AARST recommends include EPA support for the development of the basic framework such as personnel qualification and proficiency assessment elements of the certification scheme. At this point in the history of radon services credentialing, such a framework for entry-level certifications would be very helpful, and eventually expanding the framework to advanced certifications would add ultimate value. Greater uniformity with all professionals and credentialing bodies expected to follow the same basic approach will enhance accountability and credibility. While centralizing this framework and placing it in the public domain could facilitate recognition of additional credentialing bodies, AARST welcomes greater consistency and competition. Inconsistency across state lines should recede as a significant issue, and instead more States might develop licensing programs.

Under an Enhanced Option (a), AARST believes that EPA can best support the effective evaluation of radon credentialing bodies by sponsoring, convening, and maintaining an appropriate structure, that fairly represents the interests of all parties significantly concerned without any interest predominating. This structure should:

- i. support the development of the baseline requirements for certification schemes that will be included in EPA's MOU with credentialing bodies,
- ii. involve appropriate experts in creating the JTSA for each credential, and
- iii. involve appropriate experts to develop a national exam bank based upon the JTSA and to ensure the effectiveness of examinations.

Such a structure would be similar to the AARST Consortium's Executive Stakeholder Committee, which has primary stakeholder representation from Regulated States, non- Regulated States, Proficiency Programs, Educators, Public Health, EPA, Measurement Professionals, Mitigation Professionals, Inspection Professionals, and others. NRPP's Policy Advisory Board provides a similar model.

Baseline Requirements. EPA should develop, with input through an appropriate structure involving the primary stakeholders per above, baseline requirements for ISO 17024 radon credentialing bodies seeking EPA recognition. As the Notice suggests, credentialing bodies should be required to utilize consensus national standards of practice, and have a process for recertification. In addition, credentialing bodies should be required to define a code of conduct, and enforce it through discontinuation procedures. Further, EPA should require that credentialing bodies adhere to a minimum set of criteria in any certification program (scheme) that it develops for ISO 17024 accreditation. The scheme criteria should include:

1. Adherence to the criteria established by the national radon JTSA
2. Fulfillment of general education criteria as established by the JTSA
3. Use of approved devices and quality assurance
4. Continuing education requirements
5. Demonstrated competency and proficiency
6. Recertification based on performance, compliance (i.e. surveillance), and time cycle (and/or other criteria)

Jobs Tasks Skills Analysis (JTSA). EPA should develop (JTSA) for the radon certifications to be used by credentialing bodies by sponsoring and maintaining Expert Panels to develop and maintain JTSA's for mitigation and measurement – one panel for each of the major fields of work within the radon profession. Each panel would be tasked initially with completing the JTSA for the entry-level credential within its discipline and defining other credentials for which additional JTSA's are needed. The membership for each Panel should represent a balance of State radon offices (regulated and non-regulated), radon training providers, mitigation and measurement professionals, the AARST Consortium, federal agencies, and relevant other subject matter experts. To support the applicability of the JTSA's, EPA should provide for stakeholder review and validation of the JTSA's under the management of a qualified psychometrician.

Exams. EPA should create and maintain an Exams Committee that will establish a national exam data bank for use and administration (under license) by certification bodies, providing an exam database for entry level certifications. Greater consistency through national exams based upon the JTSA would increase confidence by the States and reciprocity among credentialing bodies, and allow a focus on the actual technical issues. While Exams Committee participants should include an array of expert stakeholders, per 17024 no exam committee members may offer training. Exams for advanced certification would be established and maintained by the individual certification programs per the schemes for their advanced program. To support the applicability of the work of the Exams Committee, EPA should provide for stakeholder review and validation of the exam questions under the management of a qualified psychometrician and arrange for the management of the data bank.

Discussion of Other EPA-Proposed Options for Program-Related Components

AARST appreciates that the notice outlined a continuum of options in terms of the level, duration and extent of EPA involvement in developing and maintaining the certification schemes. AARST does not believe that US EPA has the time, personnel, or financial resources to set up and maintain the management of entire schemes or certifications for use by certifying bodies. While initiating an ISO 17024 program requires a multi-year effort exceeding three years, continuous maintenance requires ongoing adjustment and the capacity to undergo extensive review and audit at least every five years thereafter.

Option (b): The concept of licensing the scheme to a single organization would be subject to challenge. Radon stakeholders need EPA to backstop the needed processes for developing and maintaining the basic framework such as personnel qualification and proficiency assessment elements of the

certification scheme for entry-level certifications.

Option (c): It is unlikely that EPA ownership of the scheme is sustainable since this would require a long-term expansion in the function of the Indoor Environments Division with capacity to support ongoing interpretations and the quinquennial audit.

AARST believes that the most cost-effective and efficient methodology is an Enhanced Option (a) because it relies on consensus standards developed in cooperation with State agencies and the private sector and it empowers State agencies and the private sector to cooperate on the enhancement and compliance of professionals in the use of standards of practice.

Accreditation Bodies

EPA should establish a list of the ISO Accreditation Organizations that are qualified as 17024 accreditation bodies that EPA will recognize. AARST recommends the following North American accreditation bodies:

1. [American National Standards Institute \(ANSI\)](#)
2. [National Commission for Certifying Agencies \(NCCA\)](#)
3. [International Accreditation Service](#)
4. [IAR Accreditation Service](#)

Discussion of States' Role

AARST concurs that EPA should require every SIRG-funded State radon licensing program to meet the criteria, by achieving ISO 17024 accreditation for the State program or by requiring that its licensees possess certification by a credentialing body accredited under ISO 17024. While some licensing States might opt to use the services of private credentialing bodies, others may develop certification programs within the framework of the national radon JTSA and criteria to apply for and maintain 17024 accreditation. AARST recommends that EPA ensure that State radon programs have access to tools to assist them in transitioning to ISO 17024 compliance. AARST believes that it is important that all personnel in all states be credentialed by a credentialing body that is subject to ISO 17024.

EPA's overall approach, and the Enhanced Option (a) that AARST recommends, has the potential to reduce inconsistency across State lines and alleviate some administrative burden on State licensing programs (as well as help the public). Faced with a more transparent proficiency system for the radon industry, more non-regulated States might develop licensing programs whether under their own accreditation or licensee certification requirement. A uniform JTSA and related Exam will facilitate reciprocity between States as well as credentialing organizations.

Under the Enhanced Option (a), States would be represented in the Expert Panel's development of the JTSA and in the exam psychometric process.

Devices

AARST agrees that, as the notice stated, device oversight will be addressed where certifications involve the use of radon measurement devices. At minimum, certification schemes should require that professionals perform and document ongoing Quality Assurance (QA) and submit evidence of quality services associated with devices analyzed by a professional, such as periodic calibration and performance testing.

AARST maintains, and plans to continue to maintain, a list of NRPP-approved devices. Presently several States rely on this list. Maintenance or adoption of such an approved list should be required of any certification body that offers certifications that involve the use of devices. AARST could support a future ISO approach to devices should resource and time limitations allow after the ISO 17024 system is in place.

Labs

AARST would support an ISO approach to require proficiency programs to apply 17025 requirements when certifying labs under ISO 17065, should resource and time limitations allow.

ⁱ Option (a) EPA develops basic framework for credentialing organizations to follow. EPA would define parameters for the certification scheme (*e.g.*, scope(s) of practice, use of existing American National Standards Institute/American Association of Radon Scientists and Technologists (ANSI/AARST) measurement and mitigation voluntary consensus standards when developing the job task analysis (JTA), recertification requirements). Credentialing organizations might enter into a Memorandum of Understanding with EPA committing to develop and maintain a certification scheme in compliance with specified parameters.