

# California Department of Pesticide Regulation

## Criteria for Instructor Training (Train-the-Trainer) Programs for Trainers of Pesticide Handlers and Fieldworkers

### Introduction

California pesticide worker safety regulations require pesticide safety training be provided to fieldworkers and pesticide handlers by their employers. The individuals providing training must meet minimum qualifications if they are training fieldworkers or pesticide handlers involved in the commercial or research production of an agricultural commodity. One way of becoming a qualified trainer is to attend a Train-the-Trainer (T2) course that is approved by the Department of Pesticide Regulation (DPR) and taught by a DPR-approved T2 instructor.

### Background

The United States Environmental Protection Agency's (U.S. EPA) 2015 Worker Protection Standard (WPS) requires individuals to complete a U.S. EPA-approved T2 program that would allow them to train fieldworkers and pesticide handlers. California has its own pesticide safety regulations as permitted by federal statutes that allow State Lead Agencies (SLAs), such as DPR, to create and maintain their own worker protection regulations as long as state regulations are at least as restrictive as federal standards. U.S. EPA has determined that DPR's T2 instructor training program approval process is equivalent to U.S. EPA's, and is allowing DPR to continue to review and approve all California T2 instructor training programs on behalf of U.S. EPA. All instructor training T2 programs for trainers of pesticide handlers and fieldworkers must be based on California laws and regulations governing pesticide use and submitted to DPR for review and approval.

### Purpose

This document provides guidance to people interested in becoming DPR-approved instructors for trainers of fieldworkers and pesticide handlers in California. This document includes the minimum criteria for T2 instructors and their programs to meet California requirements under Title 3 of the California Code of Regulations (3 CCR) and U.S. EPA's 2015 WPS revisions. Current California regulations incorporate the federal WPS requirements for pesticide safety training and have been approved by U.S. EPA to either meet or exceed the current federal requirements. In California, the Food and Agricultural Code and the California Code of Regulations must be followed.

This document is organized into the following sections:

- I. Who is qualified to train?
- II. What are the minimum criteria that T2 instructors and programs must meet?
- III. How can I obtain DPR approval as a T2 instructor and for my T2 program?
- IV. What are the basic training requirements for pesticide handlers?
- V. What are the basic training requirements for fieldworkers?
- VI. What are the differences between federal requirements and California-specific requirements?
- VII. Appendices A through D: Lists of training requirements and best practices.

## **I. Who is qualified to train?**

### **Trainers of Fieldworkers and Pesticide Handlers involved in the production of an agricultural commodity:**

Those with private applicator certifications (PACs) are qualified to provide fieldworker and handler training to their employees. Other persons considered “qualified” include qualified applicator licensees (QALs) and certificate holders (QACs), journeyman pilots (JPCs), agricultural pest control advisers (PCAs), registered professional foresters, county biologists with a valid license in pesticide use enforcement, University of California Extension Advisors, and those who have completed a T2 program approved by DPR.

### **T2 Instructors and T2 Programs:**

Individuals who wish to instruct trainers using a DPR-approved T2 program are required to meet certain qualifications. DPR is authorized to evaluate and approve T2 instructors and their T2 programs used to qualify trainers who will train fieldworkers and pesticide handlers on pesticide safety.

## **II. What are the minimum criteria that T2 instructors and programs must meet?**

In order for an individual to be approved to hold T2 program courses, the individual must meet the qualifications to be a T2 instructor. Additionally, their T2 program and associated materials must be reviewed and approved by DPR.

### **Minimum Qualifications for T2 Instructors**

1. Instructors conducting a T2 training program for trainers of **fieldworkers** must possess the following minimum qualifications:
  - a. Demonstration of knowledge of pesticide regulatory requirements in fieldworker safety. The following qualifications meet this requirement:
    - i. County biologists with a valid license in pesticide use enforcement issued by the California Department of Food and Agriculture;
    - ii. Possession of a valid qualified applicator certificate (QAC), qualified applicator license (QAL), or agricultural pest control adviser license (PCA);
    - iii. Completion of training program courses related to regulatory requirements in fieldworker safety, such as a DPR-approved T2 course; or
    - iv. Professional experience in providing instruction to persons handling pesticides or other chemicals.

### **AND**

- b. Demonstration of knowledge of instruction techniques and principles of teaching, or professional experience in providing instruction to adults using a variety of methods such as discussion, small group work, games, and role play.

2. Instructors conducting a T2 program for trainers of **pesticide handlers** must possess the following minimum qualifications:
  - a. Demonstration of knowledge of pesticide handling activities and regulatory requirements. The following qualifications meet this requirement:
    - i. County biologists with a valid license in pesticide use enforcement issued by the California Department of Food and Agriculture;
    - ii. Possession of a valid qualified applicator certificate (QAC), qualified applicator license (QAL), or agricultural pest control adviser license (PCA);
    - iii. Completion of training program courses for pesticide handlers, such as a DPR-approved T2 course; or
    - iv. Professional experience in providing instruction to persons handling pesticides or other chemicals.

**AND**

- b. Demonstration of knowledge of instruction techniques and principles of teaching, or professional experience in providing instruction to adults using a variety of methods such as discussion, small group work, games, and role play.

### **III. Training Requirements for all T2 Programs**

1. Materials must provide instruction on providing training that covers the fieldworker training content and/or handler training content required by California regulations. Refer to Appendices A, B, C, and D at the end of this document for checklists of required training content and best practices.
2. Provide “how-to-train” information. The “how-to-train” content of these programs is just as important as the information on the pesticide safety topics that must be covered when training fieldworkers and pesticide handlers. Demonstration and utilization of hands-on training activities are highly encouraged. Prospective trainers must know how to effectively communicate the information to fieldworkers and pesticide handlers so that they understand how to work safely.
3. Stress that basic safety training for pesticide handlers and fieldworkers must be presented orally, using written materials or audio-visual materials (or a combination of the two) as aids and trainers must be present throughout the entire presentation to answer questions. The information must be presented so that it can be understood by the fieldworkers or pesticide handlers even if a translator is required. Training for fieldworkers must be presented using non-technical terms.
4. Provide a trainer's manual as part of the program. This manual should incorporate information on training methods and development of training programs, as well as in-depth information on the required concepts. DPR’s Train-the-Trainer manual can be used to fulfill this requirement.
5. Provide a certificate of completion to each pesticide safety trainer who satisfactorily completes the program. The certificate of completion must include:

- First and last name of attendee
  - Course title
  - Course date
  - Statement that participant has successfully completed the course
  - T2 Instructor's signature, printed name, company, and address.
  - Approval number for the T2 Program (*will be given to you by DPR*)
6. Instructors who train trainers must document the following information on all persons who attend and successfully complete their training programs and must be made available to DPR upon request:
- Attendee's name
  - Attendee's business name or affiliation
  - Street address or post office box number
  - City, State, and ZIP code
  - Telephone number
  - Date and location of training
  - T2 instructor name and the approval number for their T2 Program
7. Provide DPR with an advanced schedule of training dates and locations. DPR has the authority to audit an instructor's T2 course to continually evaluate and qualify each program. Send schedule information in an email to: T2Trainers@cdpr.ca.gov.

#### **IV. How can I obtain DPR approval as a T2 Instructor and for my T2 Program?**

Please send your complete T2 Program approval request package to:

Train-the-Trainer Program  
 WHS Branch, MS 4  
 Department of Pesticide Regulation  
 1001 I Street, P.O. Box 4015  
 Sacramento, CA 95812-4015

Persons requesting approval as a T2 instructor and for their T2 program must provide the following information:

1. *Train-the-Trainer (T2) Program Approval Application* (enclosed). This form is a tool to help prospective T2 instructors ensure they provide all the information DPR needs to approve their T2 program.
2. List of T2 instructor's qualifications including education, related professional experience (e.g., developing curriculum and providing instruction, knowledge of teaching techniques, and principles of instruction), special skills, and areas of expertise.
3. Course outline that describes the program in detail. Note that T2 programs must be kept current to reflect any changes in federal or state requirements. T2 training programs that

are not updated according to changes in federal and/or state requirements are NOT considered approved.

4. Copy of all course materials including required trainer's manual, audio-visual aids, and handouts. The materials should indicate how each topic or section corresponds with the required elements for fieldworkers and handlers.
5. Copies of the applicable appendices (included at the end of this document) with the last two columns filled out. Appendix A contains a numbered list of the training topics for fieldworkers and pesticide handlers. Appendix B contains a numbered list of additional training topics for pesticide handlers. Appendix C contains the administrative requirements for fieldworker and pesticide handler training and Appendix D contains best practices for T2 instructors' training programs.
6. A copy of the certificate that will be used to verify course completion.

## **V. What are the basic training requirements for fieldworkers?**

### **Who must be given pesticide safety training?**

3 CCR section 6764 requires employers to provide training to **all fieldworkers** entering a field that has been treated with a pesticide or has had a restricted entry interval in effect within the last 30 days working in treated fields. There are also additional training topics required for early entry workers. "Fieldworker" is defined as any person who is employed to perform cultural practices in a treated field. The definition does not include persons performing tasks as a pest control adviser, field checker, or scout, nor does it include local, state, or federal officials performing inspections, sampling, or other similar official duties (*3 CCR section 6000*).

### **When must training be given?**

California requires that fieldworkers are trained before beginning work in a treated field on the establishment and be retrained annually thereafter.

### **What topics must be covered in the fieldworker training program?**

Training programs for fieldworkers must include the minimum requirements outlined in 3 CCR section 6764(b). The topics are listed in Appendix A as a checklist for inclusion in your T2 program.

[Resources](https://www.cdpr.ca.gov/docs/whs/worker_protection.htm) for training fieldworkers can be found on DPR's website:  
[https://www.cdpr.ca.gov/docs/whs/worker\\_protection.htm](https://www.cdpr.ca.gov/docs/whs/worker_protection.htm)

### **What records must be kept by trainers of fieldworkers?**

California regulations require that the date and the content of initial and annually required training be recorded for each fieldworker. The employee must sign the record. If the employer is not the trainer, the trainer must provide the employer with a copy of the training record for each employee trained and a copy of their trainer qualifications (this point should be emphasized in the T2 program). Employers are required to retain these records for two years, at a central location at the work place, so that employees may have access to the information. Employees

must be given a copy of their training record upon request. These records are required to be made promptly available to DPR or County Agricultural Commissioner (CAC) staff upon request.

## **VI. What are the basic training requirements for pesticide handlers?**

### **Who must be given pesticide safety training?**

3 CCR section 6724 requires employers to provide training to employees who "handle" pesticides. "Handle" is defined as mixing, loading, transferring, or applying (including chemigation) or assisting with the application (including flagging) of pesticides, or servicing, repairing, cleaning, or handling equipment used in these activities. This definition also includes working with opened (including emptied, but unrinsed) containers of pesticides, adjusting, repairing, or removing treatment site coverings, incorporating pesticides into the soil, entering a treated area during any application, or performing the duties of a crop advisor, making observations of the well-being of plants, or taking samples during an application or any restricted entry interval listed on pesticide product labeling (3 CCR section 6000).

### **When must training be given?**

Training must be completed before the employee is allowed to handle pesticides, continually updated to cover any new pesticides that will be handled, and repeated at least annually thereafter.

### **What topics must be covered in the pesticide handler training program?**

Training programs for pesticide handlers must include the minimum requirements outlined in 3 CCR section 6724(b). The topics are listed in Appendix A and B as a checklist for inclusion in your T2 program.

[Resources](https://www.cdpr.ca.gov/docs/whs/worker_protection.htm) for training pesticide handlers can be found on DPR's website:  
[https://www.cdpr.ca.gov/docs/whs/worker\\_protection.htm](https://www.cdpr.ca.gov/docs/whs/worker_protection.htm)

### **What records must be kept by trainers of pesticide handlers?**

California regulations require that the date and content of initial and annually required training and the job to be assigned be recorded for each handler. The employee must sign the record. If the employer is not the trainer, the trainer must provide the employer with a copy of the training record for each employee trained and a copy of their trainer qualifications (this point should be emphasized in the T2 program). Employers are required to retain these records for each employee assigned to handle pesticides for two years, at a central location at the work place, so that employees may have access to the information. Employees must be given a copy of their training record upon request. These records are required to be made promptly available to DPR or CAC staff upon request.

## **VII. Differences between California-specific requirements and federal requirements**

U.S. EPA training materials are focused on what is required in Title 40 of the Code of Federal Regulations (40 CFR) Part 170, which is the Worker Protection Standard (WPS). California

regulations (3 CCR), which incorporate the federal WPS requirements for pesticide safety training, have been approved by U.S. EPA as either meeting or exceeding the current federal requirements. However, there are four important ways that California regulations are different from the WPS requirements. As a T2 trainer, you must be sure to point out these differences in your training and make sure trainers understand that they must teach California pesticide use regulations, rather than federal WPS requirements.

**In addition to the federal requirements, California regulations require the following:**

1. Warning signs posted in the field must show a clearly visible skull and crossbones symbol (3 CCR section 6776). *(Whereas CFR 40 Part 170.409 requires “A circle containing an upraised hand on the left and a stern face on the right must be near the center of the sign.”)*
2. Whenever employees are working as fieldworkers in a treated field or handling pesticides, the employer shall display at the worksite, all permanent decontamination facilities and decontamination facilities servicing 11 or more fieldworkers or handlers: a copy of a completed “Pesticide Safety Rules for Farmworkers” (Pesticide Safety Information Series [PSIS] leaflet A-9) for fieldworkers or “Safety Rules for Pesticide Handlers in Agricultural Settings” (PSIS leaflet A-8) for handlers. In the event that fieldworkers or handlers gather at a central location prior to transportation to the worksite, the PSIS leaflet A-8 or A-9 required to be at the worksite may instead be displayed at that central location (3 CCR sections 6723 and 6761). *(Whereas CFR 40 Part 170.311 requires that a pesticide safety display conveys basic pesticide safety concepts.)*
3. Medical supervision is required if organophosphate or carbamate pesticides with the signal word "DANGER" or "WARNING" on the label are mixed, loaded, or applied (3 CCR section 6728). *(Whereas CFR 40 Part 170 does not require medical monitoring for organophosphate or carbamate pesticides.)*
4. The employer must ensure handlers have received respirator fit-testing, medical evaluation, and respirator training, if a respirator is required by the label, restricted material permit condition, regulation, or employer (3 CCR section 6739). *(Whereas CFR 40 Part 170.505 requires that handlers receive respirator fit-testing, medical evaluation, and respirator training, if a respirator is required by label.)*

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Appendices continue on the next page.*



## APPENDIX A

### **Fieldworker and Handler Pesticide Safety Training Topics**

Please use the reference numbers (and where appropriate, sub-letters) to cross match with your T2 program text and fill out the last two columns to expedite review and approval of your T2 program.

Number	Training Topic	Check if included in program	Cross reference to location of information in manual, ppt, etc. (e.g., page #, slide #)
1.	Where and in what forms pesticides and residues may be encountered (e.g., treated surfaces, residues on clothing, personal protective equipment, application equipment, and drift).		
2.	When working in pesticide treated areas, wear work clothing that protects the body from pesticide residues.		
3.	Hazards of pesticides including acute, chronic, and delayed effects, and sensitization effects, as identified in pesticide product labeling, Safety Data Sheets (SDSs), or Pesticide Safety Information Series (PSIS) leaflets.		
4.	Routes through which pesticides can enter the body (e.g., dermal, eye, nose, oral).		
5.	Signs and symptoms of overexposure to pesticides.		
6.	Prevention, recognition, and first aid for heat-related illnesses in accordance with Title 8 of the California Code of Regulations (CCR) Section 3395.		
7.	How SDSs provide hazard, emergency medical treatment, and other information about the pesticides with which employees may come in contact.		
8.	Hazard communication program requirements for handlers and fieldworkers (e.g., pesticide use records, application-specific information, SDS availability, and completed PSIS A-8 and A-9 leaflets).		
9.a.	Routine decontamination procedures when handling pesticides and the employer's responsibility to provide decontamination supplies.		
9.b.	Wash hands before eating, drinking, using the toilet, chewing gum, using a cell phone, or using tobacco.		
9.c.	As soon as possible after working in pesticide treated areas, thoroughly wash or shower with soap and water and change into clean clothes.		
9.d.	Wash work clothes separately from other laundry before wearing them again.		
10.	First aid and emergency decontamination procedures and emergency eye flushing techniques; and if pesticides are spilled or sprayed on the body to wash immediately with decontamination supplies or nearest clean water source.		
11.	How and when to get emergency medical care.		
12.a.	How to recognize and understand the meaning of the posted warning signs used for notifying fieldworkers of restrictions on entering pesticide treated areas.		
12.b.	Include illustrations of both California and federal field posting signs and the difference between them.		

## APPENDIX A (Continued)

### **Fieldworker and Handler Pesticide Safety Training Topics**

Please use the reference numbers (and where appropriate, sub-letters) to cross match with your T2 program text and fill out the last two columns to expedite review and approval of your T2 program.

Number	Training Topic	Check if included in program	Cross reference to location of information in manual, ppt, etc. (e.g., page #, slide #)
13.a.	Definition of restricted-entry interval (REI) and application exclusion zones (AEZ).		
13.b.	How to follow directions and/or signs about keeping out of pesticide treated areas subject to an REI or an AEZ.		
14.a.	Definition of early entry and examples of early entry activities.		
14.b.	Employers must provide specific information to early entry fieldworkers before directing them to perform early entry activities.		
14.c.	Early entry fieldworkers must be at least 18 years old.		
15.	Employees cannot be allowed or directed to handle pesticides unless the employee has been trained as a handler.		
16.	Do not take pesticides or pesticide containers home from work.		
17.a.	Potential hazards to children and pregnant women from pesticide exposure.		
17.b.	Keep children and non-working family away from treated areas.		
17.c.	After working in pesticide treated areas, remove boots or shoes before entering your home and remove work clothes.		
17.d.	Wash or shower before physical contact with children or family members.		
18.	How to report suspected pesticide use violations.		
19.a.	The employee's rights, including the right to personally receive information about pesticides to which he or she may be exposed;		
19.b.	For his or her physician or an employee representative designated in writing to receive information about pesticides to which he or she may be exposed;		
19.c.	To be protected against retaliatory action due to the exercise of any of his or her rights; and		
19.d.	To report suspected use violations to the Department or county agricultural commissioner.		

## APPENDIX B

### Additional Handler-Specific Pesticide Safety Training Topics

Please use the reference numbers to cross match with your T2 program text and fill out the last two columns to expedite review and approval of your T2 program.

Number	Training Topic	Check if included in program	Cross reference to location of information in manual, ppt, etc. (e.g., page #, slide #)
1 – 19.	Topics 1 through 19 from Appendix A: Fieldworker and Handler Training Topics.		
20.	Format and meaning of information, such as precautionary statements about human health hazards, contained in pesticide product labeling.		
21.	Applicator's responsibility to protect persons, animals, and property while applying pesticides.		
22.	Applicator's responsibility to not apply pesticides in a manner that results in contact with persons not involved in the application process.		
23.	Need for, limitations, appropriate use, removal, and sanitation of any required personal protective equipment (PPE).		
24.	Safety requirements and procedures, including engineering controls (such as closed mixing systems and enclosed cabs) for handling, transporting, storing, disposing of pesticides, and spill clean-up.		
25.	Purposes and requirements for medical supervision if organophosphate or carbamate pesticides with the signal word "DANGER" or "WARNING" on the labeling are mixed, loaded, or applied for the commercial or research production of an agricultural plant commodity.		
26.	Requirements of Title 3 CCR, Division 6, Chapters 3 and 4 relating to pesticide safety, SDSs, and PSIS leaflets.		
27.	Handlers of pesticides used in the commercial or research production of an agricultural commodity must be at least 18 years of age.		
28.	Environmental concerns, such as drift, runoff, and wildlife hazards.		
29.	Field posting requirements and REIs when pesticides are applied for the commercial or research production of an agricultural commodity.		
30.	Employer's responsibility to provide handlers with information and protections designed to reduce work-related pesticide exposures and illnesses.		
31.	Employer's responsibility to provide, clean, maintain, store, and ensure proper use of all required PPE.		
32.	Employer's responsibility to provide decontamination supplies, and information specific information about pesticide use and labeling.		
33.	Handlers may not continue an application if there is a reasonable possibility of drift.		
34.	Employer's responsibility to ensure handlers have received respirator fit-testing, medical evaluation, and respirator training, if a respirator is required by label, restricted material permit condition, regulation, or employer.		
35.	Employer's responsibility to post treated areas when the application occurs in an entirely enclosed space, when the REI exceeds 4 hours for partially enclosed spaces, or when the REI exceeds 48 hours in open fields.		

## APPENDIX C

### **Fieldworker or Pesticide Handler Training Administrative Requirements**

Please use the reference numbers to cross match with your T2 program text and fill out the last two columns to expedite review and approval of your T2 program.

Number	Administrative Recommendation	Check if included in program	Cross reference to location of information in manual, ppt, etc. (e.g., page #, slide #)
1.	Training must be provided either orally from written materials or audio-visually.		
2.	Training must be provided in a manner the handler or fieldworker can understand.		
3.	The training location must be reasonably free from distractions and be conducive to training.		
4.	Training for fieldworkers or handlers may be conducted only by certified applicators, Pest Control Advisers, County Biologists licensed in pesticide regulation or investigation and environmental monitoring, Registered Professional Foresters, Farm Advisors employed by the University of California Extension office, or persons who have completed a DPR-approved train-the-trainer program.		
5	Fieldworkers and handlers must be trained annually.		
6.	Fieldworkers must be trained before they enter an area that has been treated with a pesticide, or where a restricted entry interval has been in effect within the last 30 days.		
7.	Handlers must be trained before they perform any handling task.		
8.	A qualified trainer must be present during the entire training session to respond to any questions.		
9.	Employers are responsible for maintaining records of handler or fieldworker training. The record must include: the trained handler's or fieldworker's printed name and signature, date of training, information identifying which training materials were used, trainer's name and qualification to train (e.g., train-the-trainer course certificate), and fieldworker or handler's name.		
10	Employers must provide a copy of the training record to each handler or fieldworker upon his/her request.		
11.	Employers must maintain records of handler or fieldworker training for two years and at a central location at the workplace.		

## APPENDIX D

### **Best Practices for Train-the-Trainer Instructor Program Administration**

Please use the reference numbers (and where appropriate, sub-letters) to cross match with your T2 program text and fill out the last two columns to expedite review and approval of your T2 program.

Number	Administrative Recommendation	Check if included in Program	Cross reference to location of information in manual, ppt, etc. (e.g., page #, slide #)
1.	Update T2 program with new information as regulations change.		
2.a.	Issue a certificate of completion to qualified trainers.		
2.b.	Keep records of trainers qualified through your T2 program.		
3.	Provide techniques for training adults.		
4.	Provide techniques for training low-literacy audiences.		
5.	Incorporate any local (county) requirements and information into the training.		
6.	Describe how to schedule trainings for fieldworkers and handlers.		
7.	Include a pre- and post-training evaluation of the program to assess knowledge gained and program improvement needs.		

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T2 Program Approval Application is included for your convenience on next page.*

# Train-the-Trainer (T2) Program Approval Application (Rev. 11/2021)



## T2 Instructor Contact Information

Instructor Name*	
Company Name*	
Company Address*	
City, State, ZIP Code*	
Work Phone*	
Cell Phone	
Fax*	
E-Mail Address*	

*\* Note that the asterisked items will be listed on our website unless you instruct otherwise. If you prefer an alternate contact on our website for public inquiries, please provide that information in the comments section below.*

## Type of T2 Program

Who do you plan to instruct? (check all that apply)

- English speakers       Spanish speakers       Other language, specify: \_\_\_\_\_  
 Trainers of Handlers       Trainers of Fieldworkers  
 General Public       Other, please specify: \_\_\_\_\_

## Review and Approval Submission

Please submit the following documents to us to expedite the review and approval process:

- this form (if multiple instructors, please include one form for each)  
 list of T2 instructor's qualifications and other documents (e.g. resume, training certificates) that demonstrate knowledge of: pesticide regulations and instruction techniques  
 detailed course outline of your T2 program  
 electronic copy of your complete T2 program  
 any handouts or supplemental materials (including videos)  
 copies of the T2 guidance document appendices listing the required training topics - filled out with your respective T2 program page numbers or content location  
 T2 trainer manual you will provide attendees  
 copy of completion certificate you will provide attendees

## Comments

List any specific information or special instructions here:

## Instructor's Signature

I affirm the information submitted with my program will be used to instruct my Train-the-Trainer courses. If I revise or update my program, I will send revisions to DPR for review and approval.

Name (printed)	
Signature	
Date	