

Summary of Comments Received
State Board for Certification of Water and Wastewater Systems Operators
December 15, 2008

The State Board for Certification of Water and Wastewater Systems Operators chose to not take a position on the fee structure proposed by DEP. Below is a summary of comments received from members of the audience and Board members:

- Base the ratio for system fees on the average number of operators tied to each class.
- The fee for systems should be eliminated, or minimized. The systems are facing large costs for needed infrastructure improvements. Charging fees for this program will slow down or prevent these needed improvements. In addition, many systems now pay, or help pay, costs incurred by the operator. If they are charged a fee, they may choose to stop providing this assistance.
- The costs for the program should be covered through a flat service fee based solely on the number of roster reports submitted by a training provider.
- The examination session providers should be shared a flat fee based on the number of examinations offered per year.
- The initial fee for certification should be \$150, the renewal fee raised to \$100. The fee for an examination session should be raised to \$50 to \$80 per session.
- The small training provider would find a flat fee structure burdensome. While it is obvious the end user should pay something, the fees should be based on the amount of work generated. Option 3d as presented would be acceptable.
- A large upfront fee for the training provider will shut the small provider down where the training provided is based on demand and only upon request. Option 3d as presented would be acceptable.
- DEP should look at a bulk rate for providers who generate large numbers of rosters. The fee for the processing of rosters should be capped at some amount based on the amount of training provided.
- The course approval fees should be based on the level of review. The more comprehensive course approval fee should be higher than the brief review done for those providers who went through the effort to become an approved training provider.

- The operator should be required to pay the examination session fee for up to four or five examination sessions before being allowed to attend any additional examination sessions.
- DEP should make every effort to trim costs before assessing any additional fees.
- We need to consider the impact on the number of operators. In reality there are only two sources of funding through fees, the operator and the systems. The training providers will recover these costs through an increase in attendance fees.
- Administrative costs for the program and the collection of these fees would be significantly reduced if DEP would go to a method of electronic payment and allow the use of credit cards.