

Pennsylvania Rural Water Association
Position on Chapter 302 Regulations

Background on Position

Overview of Annual Formal Classroom Training Requirements for (7) Federal Funded Programs

- Shall focus on critical compliance issues.
- Meet the criteria guidelines of the classroom training.
- Sessions geographically cover the state.
- Sessions made available to member and non-member.
- **Training sessions must be offered without charge**

Pennsylvania Rural Water Association has seven (7) Federal Funded Programs that all require providing classroom training hours to fulfill the program and the federal grant requirements. PRWA also has two (2) State Funded Programs that also have in recent years added training requirements. The Federal Programs allow for the rental of rooms and the purchase of lunches. The programs also cover some marketing expenses and production of materials. The State Programs allow for all the above costs except lunch for which we charge a small fee. None of the programs allow for the costs of fees such as memberships, subscriptions or fees for the administration of the program to another agency.

Pennsylvania Rural Water Association also has a for fee training program that we charge \$75/\$100 per student. From those fees we cover the cost of the instructor, the marketing and mailing, production of the materials, room rental and lunch. Our average profit from those classes is about 15% of the charge to the student. Our purpose was not necessarily to make a profit, but to provide a higher level of training to the seasoned operator whose experience warranted Continuing Education beyond the basics.

Fee Option Position:

Although Pennsylvania Rural Water Association understands the need for a fee structure to help support the Drinking Water and Wastewater Systems Operator Certification and Training Program and are more than willing to pay their fair share, we also believe we should not be punished for being the largest provider of training and certification exams. The Pennsylvania Department of Environmental Protection ask for Training Providers and Exam Providers to fulfill the need to provide training and certification exams to the operators of the state and Pennsylvania Rural Water Association stepped up and provided that service. The Department

also approved 180 other training providers and 40 other exam providers who had the same opportunity to provide the service. We understand that the other providers do not have the same Federal and State Funding that Pennsylvania Rural Water has; however the cost of their trainings should have been set to fit their operating costs therefore making them a business entity. As business entities there are costs associated with doing business. We also understand that we create over 70% of the workload in both the Certification and Training Departments, which is why we favor the flat Annual Fee Structure in which Pennsylvania Rural Water Association proposed costs (\$7,000) are seven (7) times higher than most of the other Training Providers. We feel this is our fair share.

Pennsylvania Rural Water Association does not favor separate costs for each Course Approval, Conference Approval and Roster Report. We feel a fee for each course approval will result in fewer new courses being approved and the fee for each roster report will result in fewer courses given. Also if we are going to pay for each course approval the current amount of time the Department takes to approve the courses is unacceptable (9 weeks for the last 2 approvals). We also feel the fee to become a training provider is too low. If the fee was much higher (at least \$500.00) the Training Providers who paid it would be more inclined to actually do training.

We also favor a flat annual fee for the Exam's. Many of the October 2008 Exam's had to be cancelled because of lack of registrations. Rural Water also combined two of our exams and helped AWWA with two of their exams by taking their registrations for one exam and giving them enough people to fill another exam. A large group of the other exam providers only offer the exam at their Annual Conferences and those that offer more would only schedule exams they knew they could fill at least 30 seats saving the Certification Department the additional work associated with cancelled exams. Exams could also be more effectively scheduled in the areas that needed them the most.

As for Certification Fee's, we feel that a potential operator should pay at least \$50 to \$80 to sit for the exam. We also feel once an operator has sat at least three (3) times and has not applied for certification they should receive an invoice for their current balance due and should not be allowed to sit for another exam until that invoice is paid. We are all concerned by the future operator shortage this state faces, but we also want quality operators that understand the value of their certification. A fee of a little over \$18 a year for an operator certification is not enough; therefore we would like to see the renewal fee be set at a higher rate. We all talk about the lack of professionalism in this industry and possibly increasing the fees to become and remain a certified operator could help.

Pennsylvania Rural Water Association agrees 100% with the Post Presentation Credit Fee of \$250.00.

As was stated at the Certification Board meeting we are not in favor of charging the systems a fee; however we understand the need associated with those fees.

Thank you for letting Pennsylvania Rural Water express our concerns, our formal position on the fee structures we favor follow. We feel this would be the simplest to administer and the accounting would be easier for both the Department and the Providers.

Annual Service Fee	Training Provider	
	100 Roster and Above	7,000
includes course approvals, conference approval, course rosters	49-99 Rosters A Year	5,000
also must include a faster course approval time	13-49 Rosters a Year	2,500
if a provider does not do any training or pay the fee for a period of time, they are dropped from the books	0-12 Rosters a Year	1,000
	Provider Approval Application	1,500
	Exam Provider	
	10 or More Exams	1,500.00
	5 to 10 Exams	1,000.00
	2 to 5 Exams	500.00
	1 Exam a Year	250.00