

Notice of Intent Regarding WaterSense® Irrigation Partner and Professional Certification Program Specification Restructure

1.0 Introduction

In 2006, the U.S. Environmental Protection Agency's (EPA's) WaterSense program released three final specifications for professional certification programs: *Specification for WaterSense Labeling of Certification Programs for Irrigation System Designers*; *Specification for WaterSense Labeling of Certification Programs for Irrigation System Auditors*; and *Specification for WaterSense Labeling of Certification Programs for Irrigation System Installation and Maintenance Professionals*. At that time, EPA also decided to allow professionals certified through programs that earned the WaterSense label to voluntarily partner with the WaterSense program. To date, WaterSense has labeled nine programs that meet the criteria in these specifications and partnered with more than 1,300 irrigation professionals certified by WaterSense labeled programs.

After six years of working with professional certifying organizations (PCOs) and certified individuals to encourage water efficiency, WaterSense is re-examining the means by which it labels professional certification programs and engages irrigation professionals. WaterSense is providing this notice of intent (NOI) to describe how it proposes to modify the process moving forward in order to promote a greater focus on water efficiency in professional certification programs in a resource-limited environment. The proposals described below reflect the WaterSense program's evaluation of the benefits and challenges associated with the existing process, its experience in running the product certification program, and its desire to expand the program's reach.

1.1 Specifications for Professional Certification Programs

After release of the initial set of specifications for professional certification programs in 2006, WaterSense had hoped to expand the range of labeled professional certification programs beyond those that apply solely to irrigation. Stakeholders representing other professions, including landscape design and plumbing, were interested in seeking labeling of their programs. However, the structure of the program and available resources made it infeasible for WaterSense to consider such program expansion.

As part of this NOI, WaterSense is indicating its intent to restructure its current specifications for labeling professional certification programs with the goal of creating a consolidated and common set of general requirements applicable to all PCOs regardless of program sector (hereafter referred to as the "general requirements document"). This document will contain all of the general criteria that PCOs will need to meet in order for their programs to earn the WaterSense label. Requirements specific to particular types of professional certification programs will continue to be defined by individual WaterSense specifications. The benefits of this approach include:

- Establishing a level of consistency among different types of PCOs with WaterSense labeled programs.
- Aligning the labeling process for professional certification programs with the labeling process for water-efficient products and new homes. All WaterSense labeled products

and homes must meet individual specifications augmented and supported by a set of consistent, overarching requirements that guide the certification and labeling process.

- Allowing WaterSense to streamline the development of specifications for additional types of certification programs by focusing on establishing sector-specific program requirements rather than the general requirements for the PCOs running the programs.

1.2 Irrigation Partnership

To date, WaterSense has signed partnership agreements with more than 1,300 irrigation partners. Currently, WaterSense requires that individuals that hold a labeled certification sign up to become an irrigation partner. These 1,300 partners do not reflect the full universe of qualified professionals; WaterSense partners account for approximately one-third of the number of individuals who have been certified by WaterSense labeled programs. Research conducted by WaterSense determined that there is a need to increase availability of qualified professionals, even though the partners are spread across the country they tend to be concentrated in a few markets.

In recent years, several green building initiatives, including the *WaterSense New Homes Specification* and Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management*, have recognized the benefits associated with using the services of a certified professional qualified in water-efficient practices, and therefore have recommended or required the use of WaterSense irrigation partners to provide such services. Expanding the availability of such qualified professionals is critical to implementation of green building programs and other water-efficiency initiatives. In this Notice of Intent (NOI), WaterSense describes plans to expand its reach to all professionals certified by WaterSense labeled programs, not just those that take the extra step of signing a partnership agreement. With this change, WaterSense aims to identify additional certified professionals available to green building programs, as well as to the public.

To support this change, WaterSense is indicating its intent to make more efficient use of the existing coordination among PCOs and the professionals they certify. This efficiency will be gained by asking the PCOs to be responsible for communicating with certified professionals about WaterSense and tracking individuals' certification status, among other changes. This will free up WaterSense resources that can be used to help develop materials to support certified professionals and to expand the program to other types of professional certification programs.

1.3 Timeline for Potential Modifications

WaterSense intends to focus first on developing a general requirements document for PCOs. WaterSense then plans to revise its three existing professional certification program specifications to incorporate this change and explore opportunities to develop specifications for new certification program types.

The remainder of this document discusses the details of specification restructuring and revisions (Section 2.0), WaterSense irrigation partnership restructuring (Section 3.0) and other issues (Section 4.0). Questions for which WaterSense is seeking feedback to inform its actions are described in Section 5.0. In order to provide sufficient opportunity for public comments and involvement, WaterSense will undertake the changes through a phased approach, described below.

Phase I (October 2012) includes the following action items:

- WaterSense issues an NOI to announce its intent to develop a general requirements document for labeling certification programs and plans for restructuring irrigation partnership.

Phase II (spring 2013) will include the following action items:

- WaterSense issues a draft PCO general requirements document for public comment.
- WaterSense issues an NOI to revise current specifications and develop a new specification for professional certification programs.

Phase III/IV (schedule to be determined) will include the following action items:

- WaterSense issues the final general requirements document.
- WaterSense issues draft and final specifications for new and revised specifications, respectively, for professional certification programs.
- EPA implements changes to its WaterSense irrigation partnership program.

Consistent with its program guidelines, WaterSense may or may not proceed with the actions described within this NOI based on resource constraints, shifts in program and EPA priorities, and comments received through the NOI process.

2.0 Proposed Specification Restructure and Development

WaterSense intends to develop a general requirements document that will include the criteria that a PCO will need to meet in order to apply to earn the WaterSense label for a certification program. The general requirements document will serve a similar purpose to the *WaterSense Product Certification System* and *WaterSense New Homes Certification System* in that it will define the roles and responsibilities of WaterSense and the PCOs and outline the application process for PCOs seeking the WaterSense label for a certification program. PCOs will apply for general approval in accordance with the general requirements document and, once approved, can apply to have their individual certification programs labeled under a WaterSense specification. EPA will continue to be responsible for determining whether or not the PCOs meet the criteria in the general requirements document and for reviewing applications for specific labeled programs.

Based on established credentialing standards, the existing WaterSense specifications for professional certification programs, and the certification systems for WaterSense labeled products and new homes, WaterSense anticipates the general requirements document will include elements in the following areas:

- [PCO eligibility requirements](#)
- [Application and labeling processes](#)
- [PCO roles and responsibilities](#)
- [EPA roles and responsibilities](#)

WaterSense is aiming to provide the details of the general requirements document in draft form for public comment in spring 2013.

A PCO will be required to meet certain criteria in order to apply for a certification program to be labeled. The following items will be taken into consideration when determining the eligibility of a PCO and will be addressed in the general requirements document (Note—roles and responsibilities followed by an asterisk [*] are currently included in WaterSense specifications for labeling of professional certification programs):

- Institutional stability of the PCO.
- Independent oversight of certification program development and management.*
- Capability to require/track experiential requirements.*
- Capability to develop an assessment instrument (i.e., examination) that has undergone professional review.*
- Processes to ensure exams are secure related to storage, administration, and grading.*
- Capability to track individuals' certification expiration, renewal, and continuing education units.*
- Capability to track and post publicly information on individual certified professionals, including service area.
- Capability to revoke certification from professionals if renewal requirements are not met.*
- Signed partnership agreement with WaterSense.*

The following application and labeling processes will be addressed in the general requirements document:

- Processes to document eligibility requirements and apply to have programs labeled.
- Processes for PCO approval and receipt of the WaterSense label.
- Transition timelines for adopting new specification requirements.

A PCO will be required to follow general requirements once a program has been labeled. The following PCO roles and responsibilities will be addressed in the general requirements document:

- Report any changes in program structure or exam to WaterSense.
- Report on an annual basis to WaterSense the number of certified individuals.
- Communicate with certified individuals about WaterSense.
- Maintain a listing of certified individuals and their service area and post on a publicly available website.
- Follow the *WaterSense Program Mark Guidelines*.

The following EPA roles and responsibilities will be discussed in the general requirements document:

- Determine if PCO meets general requirements.
- Review applications for labeled programs.
- Provide PCOs with information for certified professionals.
- Monitor use of the WaterSense label.
- Maintain procedures for suspension or withdrawal of PCOs.
- Maintain procedures for revisions or modifications to general requirements or specifications as required.

Because the criteria relevant to all PCOs will be included in the general requirements document, revised existing specifications and future WaterSense specifications for certification programs will only include criteria relevant to the technical scope addressed by that specification. This new specification structure will be developed in conjunction with the general requirements

document. WaterSense anticipates that any relevant NOIs regarding revised and/or new specifications will be released along with the draft general requirements document in early 2013. All currently labeled programs will be required to reapply for the WaterSense label under this new system once it is finalized and appropriate transition times have been established.

3.0 Proposed Changes to Irrigation Partnership

As discussed above, WaterSense plans to change the structure of its irrigation partnership in order to improve the program's reach to certified irrigation professionals and more effectively meet the goals associated with the program. WaterSense has identified several challenges with the current structure of the program that limit its expected benefits of promoting certified professionals.

In recent months, WaterSense conducted research on the effectiveness and value of its irrigation partnership. This research included interviews with current PCOs, irrigation partners, utilities, and other interested parties, as well as an internal evaluation regarding benefits and costs. The research concluded that the benefits of the irrigation program come primarily through the labeling and promotion of certification programs and not through direct partnership with individual professionals. Irrigation partnership has only been moderately effective at reaching professionals certified by WaterSense labeled programs; only 30 percent of all professionals certified by a WaterSense labeled program have signed up as WaterSense partners. Furthermore, WaterSense has found that professionals certified by a WaterSense labeled program were equally committed to water efficiency, whether or not they became partners with WaterSense.

Because of the low WaterSense irrigation partnership participation rate, local governments, utilities, nonprofits, and WaterSense itself have been limited in their ability to promote WaterSense irrigation partners. WaterSense stakeholders have reported that it is difficult to specify the use of WaterSense irrigation partners in green building standards and programs, state and municipal codes, and the WaterSense new homes program because there are not enough irrigation partners to adequately provide service area coverage.

For some PCOs, the current structure has affected their ability to promote the WaterSense program because of the inherent conflict associated with promoting WaterSense irrigation partners above their other certified members. In addition, there is a substantial administrative burden on both EPA and PCOs associated with WaterSense managing the irrigation partnership in its current form. Because these resources have been required to manage irrigation partnership, WaterSense has been limited in its ability to work with other professional groups that also influence water savings. The resource demands associated with individual professional partnerships have also limited WaterSense's ability to promote certified professionals in general and the need for efficient irrigation to the public.

To address these challenges and position the program for future growth, WaterSense intends to expand the benefits of partnership to all professionals certified by a WaterSense labeled program by removing the irrigation partnership designation. WaterSense has carefully considered which aspects of the program could be changed without compromising the integrity of the program. With this change, WaterSense intends to maintain the core program benefits provided to irrigation professionals, PCOs, other WaterSense partners, and the WaterSense

program at large, but will reduce the administrative burden on EPA and PCOs to process irrigation partnerships.

3.1 Changes Affecting WaterSense Irrigation Partners

WaterSense intends to expand the current benefits of WaterSense partnership to all professionals certified by a WaterSense labeled program by removing the partner designation. This change will allow WaterSense to promote all certified professionals, not just those who have filled out a partnership agreement.

WaterSense has found that the current irrigation partnership provides a number of valuable benefits to certified irrigation professionals, including increased job opportunities and the credibility of associating with a national program. It is important to WaterSense that professionals certified by a WaterSense labeled program continue to receive these benefits as the program evolves.

Once this program change goes into effect, WaterSense plans to make existing WaterSense irrigation partner promotional materials available to all professionals certified by a WaterSense labeled program. WaterSense also plans to develop new materials designed to help irrigation professionals certified through a WaterSense labeled program promote their expertise in water efficiency.

WaterSense will work to promote all professionals certified by WaterSense labeled programs for opportunities that are currently afforded exclusively to WaterSense irrigation partners, including work opportunities to support building homes to the WaterSense new homes specification criteria. EPA will also work to educate green building programs and state and municipal codes that require irrigation system work be performed by WaterSense irrigation partners about this change.

WaterSense will continue to provide national recognition and credibility for professionals certified by WaterSense labeled programs. The removal of the partnership designation will mean that the term "WaterSense irrigation partner" will be phased out, along with the use of the WaterSense partner logo for irrigation professionals. Instead, professionals will be able to promote themselves as "certified by a WaterSense labeled program" and use the "Ask About" WaterSense promotional label to promote their certification and commitment to water-efficient irrigation.

3.2 Changes Affecting Irrigation PCOs

The proposed changes to the WaterSense irrigation partnership are expected to enhance the value of earning the WaterSense label for professional certification programs. By removing the distinction between the certified professionals who take the extra step of signing a WaterSense partnership agreement and those who do not, WaterSense will be able to provide benefits to all professionals certified by labeled programs, rather than just WaterSense partners, which enhances the benefits of the certification program to participants. WaterSense anticipates that this change will make it easier for the PCOs to promote their labeled programs to potential certification candidates.

Removing the partnership designation will also reduce the administrative burden of the certification renewal process on both PCOs and WaterSense. WaterSense will maintain the requirements that labeled certifications be renewed and include the submission of documentation that the practitioner has maintained proficiency in the subject matter. However, by eliminating the partnership designation, EPA will no longer require PCOs to coordinate the status of individual professionals with WaterSense during this process.

In order to facilitate these changes to the program, PCOs would need to become the primary conduit for WaterSense information to irrigation professionals. The PCOs will also communicate with certified professionals regarding WaterSense program updates. In addition, the PCOs will be required to submit annual data to EPA on their WaterSense labeled professional certification programs, including the number of individuals who have obtained certifications. The PCOs will also be required to provide an online listing of all certified professionals and their service areas.

These new requirements will ensure that WaterSense labeled professional certification programs continue to benefit certified professionals, allow WaterSense builder and promotional partners to identify certified professionals, and promote individuals who are qualified in water-efficient techniques.

4.0 Other Issues

There are other issues that WaterSense must consider as it moves forward to develop a new approach to certifying additional professional organizations. The resources associated with developing professional certification specifications are considerable. Although WaterSense's focus is on adding water-efficiency content to certifications, the program must also ensure the performance and proficiency of the underlying professional services. This could be difficult for the WaterSense program because it would require evaluation of many different types of services.

One approach that could facilitate labeling additional programs would be for WaterSense to consider requiring third-party accreditation by relevant organizations in order for certification programs to receive the label. For example, the American National Standards Institute (ANSI) and Institute for Credentialing Excellence (ICE) have developed credentialing standards and accredit certification programs associated with health care and other sectors to their standards. Other federal agencies such as the Department of Energy and Department of Defense have required accreditation for approved programs. However, the cost associated with accreditation can be significant for PCOs and could limit access to the WaterSense label for smaller organizations. Accrediting to existing standards is a rigorous process due to the impact on human health and safety that professionals, such as those in the health care industry, have. However, these issues might not be relevant to the types of professional programs that WaterSense would label.

The WaterSense program continues to conduct research to inform the best way to assure quality of certification program services while making the label available to additional professional programs. The Agency is interested in feedback on how it could achieve its goal of labeling additional certification programs, short of requiring accreditation, without creating a substantial burden on EPA or PCOs.

5.0 Request for Feedback

As WaterSense considers restructuring its irrigation partnership, developing the general requirements document, revising existing specifications, and issuing new specifications for professional certification programs, EPA will solicit stakeholder feedback on these changes. WaterSense intends that, with these changes, the program will be able to expand its reach to a larger number of currently certified professionals, as well as professionals certified in a variety of other sectors that can help promote water efficiency across the United States.

At this time, WaterSense welcomes feedback on all concepts and topics included in this NOI. In particular, EPA is seeking feedback on some specific questions, listed below.

The following questions are related to the specification restructure and development processes:

- Please provide feedback on the range and type of criteria proposed for inclusion in the general requirements document listed under Section 3.0. Are there any other general criteria that should be addressed by this document?
- WaterSense will provide a transition period for existing programs to meet these new requirements. EPA is interested in hearing from existing PCOs on how long it will take to implement these changes and reapply under the new structure.

The following questions are related to irrigation partnership:

- WaterSense makes many resources available to irrigation partners on the WaterSense partner website. Should WaterSense continue to make these resources available?
- Which resources are most useful? What additional materials would be useful to certified professionals if WaterSense could make them available?
- What additional support can WaterSense provide to PCOs to maintain a strong program presence with professionals?
- Are there additional ways in which WaterSense can recognize certified professionals' accomplishments or support professionals in the promotion of WaterSense?
- Should there be a unified list on the EPA website that includes all certified professionals rather than pointing interested parties to individual PCO websites to find them?

The following questions are related to other issues and alternative approaches:

- Some federal agencies require accreditation to existing credentialing standards for approved programs. Should WaterSense consider moving in this direction? Are there other ways WaterSense can achieve the goals outlined in this NOI without accreditation?
- What other areas should WaterSense consider for professional certification program specification development?
- Short of labeling professional certification programs, are there alternative approaches that WaterSense should consider that would help it to expand consideration of water efficiency in professional services?

All interested parties are encouraged to submit comments to watersense-programs@erg.com.