### 2025 NCDA&CS Structural Pest Control Revised Rules & Regulations Frequently Asked Questions

### **General Questions**

Will there be a specific area of the website that will contain all the details (forms, videos etc.) dealing with these revised requirements?

The NCDA&CS Structural Pest Control Section homepage has a link to the Rules Revision page with all the information.

#### Will the presentation materials be made available for viewing later?

The slides and a video of the Raleigh meeting, that occurred on May 21<sup>st</sup>, 2025, are currently available on our website.

#### What does C&T stand for?

**Certification & Training** 

#### What are the penalties if PMPs do not follow these new rules?

The penalties for non-compliance are the same as not adhering to other Structural Pest Control regulations.

#### Is South Carolina the same as North Carolina for revisions to their Structural rules?

NCDA&CS cannot speak to the changes to the regulations in South Carolina. We suggest you contact their regulatory agency for guidance.

#### What constitutes 'readily available' for pesticide labels?

Persons using pesticides must have immediate access to the label when the need arises, be it in digital or paper form. Digital copies should be stored to your local drive. If you are in a location without internet/cell service, you should still be able to bring up the label.

#### Can PMPs still use physical copies of pesticide labels?

Yes. Physical copies of labels that match the pesticide in question are appropriate.

#### Is the equipment form an everyday form?

It is a requirement that PMPs check the equipment they plan on using each workday, but how an Equipment Checklist form is utilized is up to each individual company.

# Is documenting how equipment is checked up to each individual licensee or will the department provide something?

NCDA&CS has provided an example of an Equipment Checklist on our website, but each company is responsible for determining how to best achieve this requirement. You can use the checklist provided, modify it, or create your own.

#### Can a company's in-house training satisfy the daily equipment checklist requirement?

It is up to each individual company to determine how to document the requirement of checking their equipment prior to each day's use.

#### Can PMPs use a digital equipment checklist?

It is up to each individual company to create a record documenting equipment is checked daily prior to use.

#### Do applicators need to sign off that they checked their equipment?

Applicators are required to check equipment prior to use each day and document the equipment is in good working order.

#### Can PMPs use digital signatures for our documentation?

If you plan on using digital signatures, we strongly suggest you ensure that only the individual signing the document can add their signature to it.

#### How does the equipment document relate to annual (routine) inspections?

Reviewing Equipment Logs is a part of each NCDA&CS Field Inspector's duty during a routine inspection.

#### How long do PMPs need to keep training records?

We suggest you keep training records as long as possible. Not only are they a regulatory requirement, but they may also prove useful in other ways (exposure investigations, civil lawsuits, etc.) A good general rule of thumb is 2 years after the employee no longer works for the company.

#### How do PMPs maintain records if they are currently stored on outdated technologies?

We suggest you routinely review your record retention policies and make sure you utilize strategies that allow continued access to necessary records. Paper records may be an acceptable solution to this issue.

### **Registered Technicians (RT)**

#### Does the 75-day rule still exist for RTs?

All persons performing sales, solicitation, service, or inspection MUST obtain a Registered Technician card within the first 75 days of hire.

#### Do office staff need RT cards?

If office staff are engaged in sales, solicitation, service, or inspection, they MUST obtain a Registered Technician Card.

# What if an RT only does inspections and does not provide any treatments, will they still need this annual RT training?

The annual training is required for ALL Registered Technicians, no matter what their specific job duties entail.

#### Does the training requirement only concern new RTs? Are current RTs grandfathered in?

All Registered Technicians are affected by these changes. There is no "grandfathering" of current Registered Technicians.

#### What happens to current RTs that are less than 18 years old?

Starting July 1, 2025, all Registered Technicians must be 18 years old. No one performing sales, solicitation, service, or inspection can be less than 18. Persons less than 18 can still perform ancillary duties as laid out in the statutes.

#### Does this mean that someone cannot perform a treatment until they have an RT Card?

Until an individual completes all requirements of 02 NCAC 34.0313(d) they are not permitted to perform a treatment on their own.

#### The rule changes appear to deal mostly with RTs. Are they trying to force all RTs to become CAs?

There is no "push" to force all Registered Technicians to become Certified Applicators. The goal is to enhance RT's knowledge and accountability, not to mandate certification.

#### Is there a template for the required annual RT training on the website?

The NCDA&CS annual Registered Technician training will be a video all technicians must view.

#### Will there be a certificate for completion of the annual RT training?

There is a completion certificate available for both the annual Registered Technician AND Certified Applicator/Licensee trainings.

#### What is the length of the new required annual training video for registered technicians?

Approximately 35 minutes

#### Is the annual training going to be in-person at SPC headquarters?

The annual Registered Technician training will be available on our website.

#### What is the cost for the annual technician training?

There is no cost to view the annual Registered Technician training video.

#### Can a company substitute their annual technician training for the annual NCDA&CS training?

Companies cannot replace this NCDA&CS required annual training with an "equivalent" in-house training.

# Can a company show the training video in a regular monthly meeting to a group of people or does each person need to watch individually?

Watching the NCDA&CS required training can be either as a group or as an individual.

Will the annual RT training video be in a format that can be easily embedded into a company's current training?

The videos will have a link on our website and will be hosted on an NCDA&CS affiliated YouTube channel.

Is the 35-minute RT training, to be located on the NCDA&CS website (video), the only training they need to complete each year, or is it only 1 component of a more extensive training? Can this training be administered by outside entities as part of a more comprehensive training program or only by each individual company?

We strongly encourage continual training for all PMPs, and the required annual Registered Technician training video must be included for all Registered Technicians. Outside organizations are allowed to offer training on a variety of Structural Pest Control topics, but the required RT training must be conducted/monitored by the Licensee, Certified Applicator, or approved in-house RT Equivalency trainer.

# Is the certificate of completion of the RT annual training (watching video) documented/tracked by NCDA&CS or is it the responsibility of the company to keep the documentation?

Each company is responsible for retaining the record of completion for all required trainings. Attendance verification will be reviewed by NCDA&CS Structural field staff during office visits.

#### Is the RT Workbook being updated?

We are currently in the process of updating the NCDA&CS Registered Technician Introductory Training Workbook.

#### What are the requirements for reciprocating RTs from neighboring states?

Technicians are not eligible for reciprocation to North Carolina. Reciprocation requirements to become NC Certified Applicators from VA, SC, TN, & KY are available on our website.

### Individuals with Certifications - Certified Applicators (CA) & Licensees

#### Is the training just one-time for CAs & Licensees?

The required training for Certified Applicators & Licensee only needs to be completed once.

#### If an individual advances from CA to a Licensee, do they need to retake the one-time training?

A Certified Applicator or Licensee is only required to attend the training once and that completion will carry forward from the Certified Applicator to the License credential level.

#### When will the one-time training become available?

We hope to have the training available as close to July 1, 2025 as possible. We will communicate availability information as soon as we have it.

#### Is the training the same for CAs & Licensees?

It is the same training for both Certified Applicators & Licensees.

# Can a company show the training video in a regular monthly meeting to a group of people or does each person need to watch individually?

Watching the NCDA&CS required training can be either as a group or as an individual.

#### Will there be a certificate for completion of the one-time training?

There is a completion certificate available for both the annual Registered Technician AND Certified Applicator/Licensee trainings.

#### Is the licensee training going to be in-person at SPC headquarters?

The one-time Certified Applicator & Licensee training will be available on our website.

#### Is the CA and Licensee training annually or before the 5-year renewal?

Certified Applicators & Licensees will be required to view the one-time training prior to their first phase recertification date.

#### Will the 1-time training require a specific portal-like login to officially credit you for watching the video?

The one-time training will be located on our website, and we do not anticipate employing a log-in strategy.

#### What are the recordkeeping requirements for the 1-time CA/Licensee training?

Each company is responsible for retaining the record of completion for all required trainings. Attendance verification will be reviewed by NCDA&CS Structural field staff during office visits.