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February 8, 2010

Ms. Lynn Haase, Director
Permitting and Registration Support Division
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, TX 78711

Dear Ms. Haase:

Thank you so much for meeting with the Water Utility Operator Advisory Committee (WUOLAC) on January 15. We enjoyed meeting you and look forward to working with you in your new capacity. We want to take this opportunity to provide you with some information on about an issue that our organizations have been discussing with the TCEQ licensing staff.

As city budgets get tighter and licensed water and wastewater operators face more travel restrictions for training, we believe that it is important for TCEQ to develop unique criteria to allow the approval of webinars for licensing renewal credit. Webinars offer the operators a means to get up to the minute training and information without the expense of travel.

Under the current RG-373, webinars are not specifically identified as a training delivery method, and therefore, do not have specific approval criteria. While some consider webinars a form of distance learning, the content is usually more similar to training at conferences and meetings. However, webinars often do not meet the three hour minimum that is required for approval of conferences and meetings. We believe that webinars are a unique form of training delivery and require a unique set of approval criteria. We urge you to develop specific criteria for webinars and suggest the following considerations:

- Webinar credit hours should be allowed for renewal only. TCEQ should consider limiting the number of webinar hours that can be used to satisfy renewal requirements.
- The ability to use webinars for renewal credit may be allowed for all classes of operators, or could be restricted to only certain classes of operators.

- Webinars could be approved using the criteria similar to “Training at Conferences”; however, most webinars will not meet the 3 hour minimum required in RG-373 for training at conferences. TCEQ should consider allowing approval for less than 3 hours of training credit by webinars.
- TCEQ should work with training providers to develop a system for monitoring attendance at webinars that is not burdensome for training providers or attendees.
- TCEQ should work with providers to develop a process to record and verify attendance when multiple licensees are viewing the webinar on one monitor (at one location).
- Webinar providers should be required to maintain the records and comply with TCEQ’s electronic reporting requirements.
- TCEQ should consider ways to streamline the process for approval of webinars.

We have had conversations and a productive meeting with Allan Vargas on this issue, and he may be able to provide you with additional background information. If you have any questions, please feel free to contact me at 512-924-2102, or carol@weat.org .

Sincerely,

Carol Batterton
Executive Director
Water Environment Association of Texas

cc: Allan Vargas, Manager, Occupational Licensing Section, TCEQ