

**Drinking Water and Wastewater Operator Continuing Education Credit
Request for Course Approval**

Course Title: Very Small Drinking Water and Wastewater System Resilience CEU Program

Sponsoring Organization: U.S. Environmental Protection Agency (US EPA) Water Infrastructure and Cybersecurity Resilience Division ([WICRD](#)), in partnership with the National Rural Water Association ([NRWA](#)) and Rural Community Assistance Program ([RCAP](#))

Course Format: One-on-one distance learning course with guidance from a participating local technical assistance provider

Course Length: 1-10 hours¹

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Training Location: Virtual or in-person meetings² with a participating technical assistance provider in their state

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¹ EPA WICRD proposes that the course length range from 1-10 hours to provide flexibility to the individual provider and student to use the time they need for their individual circumstances. However, individual state or tribal operator certification programs may choose to set the maximum course length eligible for CEU credit at greater or fewer than 10 hours for completing both the RRA and ERP, if they communicate this decision to allow something other than the proposed 1-10 hours to EPA for awareness at the national level.

² EPA WICRD proposes that the provider and student be able choose to meet in person or through a virtual platform. However, individual state or tribal operator certification programs may choose to approve this program as in-person OR virtual if they communicate this decision to only allow in-person or virtual learning to EPA for awareness at the national level.

I. Introduction & General Description

Under Presidential Policy Directive (PPD) 21, which addresses Critical Infrastructure Security and Resilience, the United States Environmental Protection Agency (EPA) is designated as the Sector-Specific Agency for the Water Sector. EPA's Water Infrastructure and Cybersecurity Resilience Division (WICRD) aims to enhance the preparedness and resilience of the water sector by providing practical, innovative tools and training. More information is available online at epa.gov/waterresilience.

EPA WICRD, the National Rural Water Association (NRWA), and the Rural Community Assistance Partnership (RCAP) are launching a new program in which they will provide signed certificates for up to three personnel at community drinking water systems (CWSs) that serve less than 3,301, non-CWSs, and wastewater systems who create risk and resilience assessments (RRAs) and emergency response plans (ERPs). The certificates can be submitted to state or tribal operator certification programs to receive continuing education unit (CEU) credit hours towards the operator's license renewal, if allowed by the state. EPA WICRD understands that each state and tribal operator certification program has their own preferred process for operators to apply for CEUs; students and technical assistance providers who participate in this program will be directed follow the pre-established method used by their operator certification program to apply for CEU credit hours.

This CEU program will serve as an incentive for water and wastewater systems who do not have to comply with America's Water Infrastructure Act (AWIA) Section 2013 to learn how to prepare high quality RRAs and ERPs that are unique to their specific needs. AWIA Section 2013 requires that CWSs serving populations more than 3,300 conduct and certify completion of a RRA and ERP to EPA. CWSs that serve less than 3,301, non-CWSs, and wastewater systems are not required to certify completion of a RRA or ERP to EPA. However, natural disasters and malevolent acts also occur at these facilities, therefore EPA, RCAP, and NRWA encourage these systems to think ahead and take the time to learn about and plan for disasters that could disrupt system operations by conducting RRAs and developing ERPs.

Link to Information on Very Small Drinking Water and Wastewater System Resilience CEU Program: <https://www.epa.gov/waterresilience/awia-section-2013-under-3301>

II. Course Objectives

Participants of this distance learning CEU program will:

- Learn about developing a risk and resilience assessment and know how to use EPA's [AWIA Small System Risk and Resilience Assessment Checklist](#) or other EPA approved resources to complete one. A completed or updated RRA will be required in order to receive a signed certification of completion for participation in this program.
- Understand how to develop an emergency response plan and know how to use the [Emergency Response Plan Template and Guidance](#) or other EPA approved resources to

complete one. A completed or updated ERP will be required in order to receive a signed certification of completion for participation in this program.

III. Course Format and Procedures

To qualify to receive a signed certificate, public drinking water and wastewater system personnel need to reach out to set up a meeting with a participating NRWA or RCAP technical assistance provider in their state. The technical assistance provider will serve as the instructor of this course and will help walk the water or wastewater system through the process of completing a RRA using EPA's [AWIA Small System Risk and Resilience Assessment Checklist](#) and ERP using EPA's [Emergency Response Plan Template and Guidance](#) or other EPA approved templates, such as [RCAP & AWWA's Small Systems Risk and Resilience Assessment Worksheet](#). After the RRA and ERP are complete, the technical assistance provider will present the water or wastewater system with a certificate signed by themselves, as well as a representative from EPA's WICRD. The signed certificate will contain the name(s) of the individual(s) who worked on the RRA and ERP, as well as how many hours they spent working on the documents up to a maximum of 10 hours¹ per person.

Water or wastewater system personnel who assist in the development of the RRA and ERP reports may receive no more than 10 training hours¹ total. The NRWA or RCAP technical assistance provider who is working with the system will be responsible for determining the appropriate number of CEU hours to award to the author(s) based on the time spent working with the provider or researching and working independently. The technical assistance provider will include the number of hours, up to a maximum of 10 hours¹ per individual, on the signed certificate of completion. If a water or wastewater system operator oversees multiple PWSIDs or wastewater systems, CEUs will only be granted for one provider-led course for one PWSID or wastewater system that the individual oversees. System operators and technical assistance providers must then follow the pre-established method used by their operator certification program to apply for CEU credit hours.

WICRD will develop certificates of completion for individuals who successfully complete both a RRA and ERP under the guidance of a technical assistance provider and will work with the provider to obtain required EPA WICRD and provider signatures. Certificates will be emailed to attendees within one month of the completion of their RRA and ERP.

CEU credit hours will not be allowed retroactively. However, a CWS that serves under 3,301, a non-CWS, or wastewater system that created a RRA and ERP before may still participate in this program by working with a technical assistance provider to review, identify possible gaps or weaknesses, using EPA's [AWIA Small System Risk and Resilience Assessment Checklist](#) and [Emergency Response Plan Template and Guidance](#) or another EPA approved resource, and incorporating updates to their RRA or ERP. The hours spent researching and learning during the review and update process for the RRA and ERP would be displayed on the certificate of completion.

Each Public Water System Identification Number (PWSID) or wastewater system may only receive a certificate of completion for three personnel once within a 5-year period, either for the work done to create the documents from scratch or update/improve pre-existing documents.

EPA is applying for CEU pre-approval for this program with all 50 states, the Intertribal Council of Arizona (ITCA), and the United South and Eastern Tribes (USET). EPA plans to display which state and tribal operator certification programs allow or do not allow CEU credits for this program to provide the water systems with a heads up on whether their operator certification program participates in this program or not. This information is displayed in a table at the bottom of this website: <https://www.epa.gov/waterresilience/awia-section-2013-under-3301>. The table will be updated regularly as EPA receives responses from each state and tribal operation certification program.

IV. Course Agenda

Agenda ³	
Time	Topic
15 minutes	Student and technical assistance provider discuss the specific situation of the student's current water system and how their specific situation will impact their assessment of their risk and resilience.
4.5 hours	Student and provider walk through the process of completing a RRA using EPA's AWIA Small System Risk and Resilience Assessment Checklist , or another EPA approved RRA resource, as it applies to the students current situation and needs. The student may work with the technical assistance provider the entire time or they may use a portion of this time to conduct their own research and work independently, checking back in with the technical assistance provider for guidance throughout the process.
15 minutes	Student and provider review the RRA together for accuracy and completeness and identify priority risks to incorporate in their ERP.
15 minutes	Student and provider discuss the specific situation of the student's current water system and how their specific situation will impact their emergency response plan.
4.5 hours	Student and provider walk through the process of completing an ERP using EPA's Emergency Response Plan Template and Guidance , or another EPA approved ERP resource, as it applies to the students current situation and needs. The student may work with the technical assistance provider the entire time or use a portion of this time to conduct their own research and work independently, checking back in with the technical assistance provider for guidance throughout the process.

³ The agenda assumes that the provider and student use the maximum amount of time allowed for CEU credit, 10 hours¹. However, this program is designed to be flexible so that the provider and student can meet for however long is necessary in the student's particular situation, ranging from 1-10 hours¹. The actual number of hours that the student spent working on the RRA and ERP will be reported by the provider on the Certificate of Completion.

15 minutes	Student and provider review the ERP together for accuracy and completeness, identifying key aspects of the ERP that should be communicated to colleagues to prepare them to face future disasters.
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V. EPA WICRD Program Administrator Biography

Charlene Kormondy, U.S. EPA

Charlene Kormondy is a Physical Scientist that has been working in the Water Security Division at the U.S. EPA for two years. Her work focuses on outreach, communication, and providing trainings to water utilities across the country on America’s Water Infrastructure Act (AWIA) Section 2013, which requires community drinking water systems that serve over 3,300 people to develop or update risk and resilience assessments and emergency response plans. She also leads AWIA certification tracking efforts and database management, as well as training programs for CWSs that serve less than 3,301, non-CWSs, and wastewater systems are not required to certify completion of a RRA or ERP to EPA. Previously, Charlene completed an Oak Ridge Institute for Science and Education Fellowship in the Standards and Risk Management Division of EPA's Office of Ground Water and Drinking Water. Charlene earned her master’s degree in Environmental Science and Management, with a focus on water resources management, from the Bren School of Environmental Science and Management at the University of California, Santa Barbara. While in graduate school, Charlene completed a summer internship at EPA in the Office of Wastewater Management, Water Permits Division. Charlene also holds a Bachelor of Science in Environmental Studies from the University of Central Florida.

VI. Attendance Verification and Retention of Attendance Records

Attendance at mandatory meetings and RRA and ERP completion is verified by the NRWA or RCAP technical assistance provider who is working directly with the water or wastewater system personnel to help them create or update their RRA and ERP. NRWA, RCAP, and EPA will maintain a list of individuals who were granted a certificate of completion for their participation in this program.

WICRD will maintain a spreadsheet of all attendees who request Continuing Education credit. This information is maintained in accordance with EPA’s Records Management policies. The list of participants, including operator certification numbers, will be provided to state agencies if required. If state agencies wish to confirm participation in this program in the future, inquiries may be directed to the contact or WICRD-Outreach@epa.gov.

VII. Criteria of Course Completion

To receive credit for participating in this distance learning course, operators must meet with a participating NRWA or RCAP technical assistance provider, either virtually or in person², in order to receive a certificate. The technical assistance provider will verify which individuals contributed and how much they contributed. No more than three co-authors on the RRA and ERP will be allowed to receive a certificate of completion per utility.

Sample Certificate of Completion

Attached.

CERTIFICATE OF COMPLETION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY AND
[NAME OF RURAL WATER ASSOCIATION OR REGIONAL PARTNER]

AWARDED TO

[FIRST NAME] [LAST NAME]

OF

[WATER SYSTEM NAME] [PWSID]

Operator Code:

State Code:

Course Code:

For completion of a Risk and Resilience Assessment (RRA) and Emergency
Response Plan (ERP)

[NUMBER OF] WATER CONTACT HOURS

Awarded [month] [day], 2022

[name of EPA representative]

US Environmental Protection Agency



[name of technical assistance provider]

[name of state/local rural water association
or RCAP Regional Partner]

Placeholder
for NRWA or
RCAP logo