



EPA Lead: Renovation, Repair and Painting (RRP) Program Certification/Recertification Q&A

Updated June 2016

General Questions

What training and certification requirements are there under the RRP rule?

If you will be working on homes built before 1978 or child-occupied facilities, you must comply with both firm certification requirements as well as individual renovator certification requirements.

If I'm a sole proprietor, do I only need to be a certified renovator?

No. All firms performing renovations covered by the RRP rule must be certified. Under the regulation, a "Firm" means a company, partnership, corporation, sole proprietorship or individual doing business, association, or other business entity; a federal, state, tribal or local government agency; or a nonprofit organization.

What agency do I need to apply to for certification?

It depends on where you will be working. Individuals and firms who plan to work in only one of these states:

[Alabama](#), [Delaware](#), [Georgia](#), [Iowa](#), [Kansas](#), [Massachusetts](#), [Mississippi](#), [North Carolina](#), [Oklahoma](#), [Oregon](#), [Rhode Island](#), [Utah](#), [Washington](#) or [Wisconsin](#) need to apply to and follow state guidelines for certification and training.

All other states are covered under the EPA-administered program. If you plan to work in any of these states and one covered by the EPA program, you will have to apply for and follow the guidelines for certification and training under **both** the state and EPA programs.

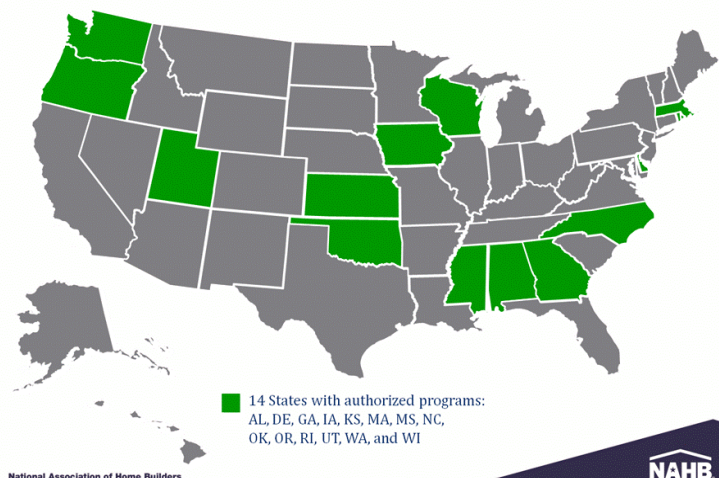
Can I apply early for recertification?

Yes, but be aware of the following differences between *individual renovator recertification* and *renovator firm recertification* when applying early for recertification.

- Renovator firm certification will be extended five years from the current expiration date regardless of how early the firm applies for recertification.
- Individual renovators who recertify by taking a refresher training course from an EPA-accredited training provider will have certification that lasts for a period of five years from the date the refresher training course is completed regardless of on what date their current certification expires.

Lead Renovation, Repair and Painting (RRP)

States Authorized to Administer RRP Programs in Lieu of the Federal Program



Firm Recertification

What are the requirements for firm recertification?

Renovation firm certifications expire every five years. Firms should be aware of their expiration date and plan on submitting their re-certification application at least **90 days** before the expiration to ensure re-certification is complete before their current certification expires. There is no penalty for applying for re-certification early and certification will be extended five years from the date of the current expiration regardless of how early a firm applies.

- Firms applying for EPA Renovation, Repair and Painting certification can complete both the application and payment online. Interested firms should follow [this link](#).
- A certified firm maintains its certification by submitting a complete and timely "Application for Firms," noting that it is an application for re-certification, and paying the required re-certification fee.
- Action by EPA in April 2015 to extended individual renovator certifications **DOES NOT** apply to firm certifications.
- **All firms performing renovations covered by the RRP rule must be certified.** A sole proprietorship or individual doing business meets the definition of "Firm" under the regulation. Even if you are/plan to get trained and certified as a certified renovator as a sole proprietorship must also be obtain firm certification.ⁱ

Individual Renovator Recertification

When do I need to complete a refresher training course to maintain my renovator certification?

Under the RRP rule (40 C.F.R. § 745.90(a)(4)) as amended (*Effective Date: April 16, 2015*)

- Individuals who completed an initial renovator training course accredited by EPA **on or before March 31, 2010:**
 - Must have completed an EPA-accredited renovator refresher training course before March 31, 2016 to maintain renovator certification.
- Individuals who completed an initial renovator training course **between April 1, 2010 and March 31, 2011:**
 - Will have one year added to their five-year certification and must complete an EPA-accredited renovator refresher training course within six years of the date the individual completed the initial training course to maintain renovator certification.
- Individuals who completed an initial renovator training course **after March 31, 2011,** to maintain renovator certification:
 - Must complete an EPA-accredited renovator refresher training course within five years of the date the individual completed the initial training course to maintain renovator certification.
- If the individual does not complete a refresher training course within the required time, the individual must re-take the initial eight-hour training course to become certified again.

How do I recertify?

EPA finalized a [regulation](#) modifying the requirement for the refresher training course that certified renovators are required to take to maintain renovator certification under the RRP program. Under the rule: (40 C.F.R. §745.90, §745.225, §745.238 as amended (*Effective Date: February 17, 2016*))

- Remodelers now have the choice of completing the refresher training course in an online-only format or taking it in the traditional classroom setting.
- If you opt for a renovator refresher course that does not include a hands-on training component (online only) it will result in a three-year renovator certification.
- If you opt for a refresher training course that includes hands-on training (regardless of whether the rest of the course is taken online or in a classroom) it will result in a five-year renovator certification.
- Individuals who take the renovator refresher without hands-on training (online only) must, for their next refresher course, take a refresher course that includes hands-on training to maintain renovator certification.

How do I find an EPA-accredited refresher training course?

Remodelers can find the required refresher training course or an accredited e-learning training provider on the EPA website.

- To find an online-only refresher training course, go to the Find the Trainer box on the bottom right of the [EPA search page](#). Check “Renovator” for discipline and “Yes” for e-learning (see example shown on the next page in Figure 1).

How Do I Recertify?



I prefer to take care of this in an online class.



I'm good for three more years.



Next time, I have to do this in-person. *It includes hands-on training.*



I'll take the in person class. *It includes hands-on training.*



I'm good for five more years.



Next time, I can choose in-person or online training.

- To search for in-person, scheduled refresher training courses, enter the information on the bottom left of the page in the “Find a Course” box (see example shown in Figure 2). Check “Refresher” under Course and “Renovator” under “Discipline” to search nationally for all scheduled, in-person refresher training courses. You can then refine the search by language, state and date.

Figure 1

Figure 2

Do recent EPA regulatory changes impact certified renovators in state-run programs?

Fourteen states received EPA authorization to manage their own lead renovation, repair and painting programs.

- Individuals and firms who plan to work in [Alabama](#), [Delaware](#), [Georgia](#), [Iowa](#), [Kansas](#), [Massachusetts](#), [Mississippi](#), [North Carolina](#), [Oklahoma](#), [Oregon](#), [Rhode Island](#), [Utah](#), [Washington](#) or [Wisconsin](#) need to apply to and follow state guidelines for certification and training.
- Recent regulatory changes adopted by EPA **only** apply to certified renovators working in EPA-administered states.
- The amended refresher training course requirements and extension of renovator certifications will not be automatically mirrored in authorized state programs.
- Each individual state program will need to act, through regulation or legislative action, to adopt the rule change modifying the hands-on training requirement for the refresher training course and allowing for the option of an on-line only refresher training courses in that state.
- There is no requirement for state programs to adopt these federal rule changes.

ⁱ See EPA Renovation, Repair, and Painting (RRP) Rule Frequent Questions available at: http://www.epa.gov/sites/production/files/2014-09/documents/full_rrp_fqs_-_august_11_2014.pdf, pg. 70-71 (last visited Feb. 2, 2016).