

ITCA Responses to Bidder Questions – PART 1  
Regarding ITCA RFP TWS 18-4

- 1. What are the current existing operational and maintenance (O&M)-based standardized operator certification exams that ITCA wishes to supplement?**
- 2. What kind of supplementation does ITCA see as necessary? I.e., what gaps currently exist in the O&M-based standardized operator certification that the new ITCA certifications will address?**

The National Tribal Water & Wastewater Operator Certification Program of ITCA (the ITCA Program) is a member of the Association of Boards of Certification (ABC). Through that membership, ABC provides exam testing services to the ITCA Program, including the use of standardized operator certification exams that are developed and maintained by the Certification Commission for Environmental Professionals (C<sub>2</sub>EP). Currently, the ITCA Program uses the 2012 national standardized operator certification exams, which included federal regulatory exam questions, as well as need-to-know criteria that references federal Safe Drinking Water Act (SDWA) and federal Clean Water Act (CWA) regulations and rules. In 2017, ABC began offering new standardized operator certification exams that were developed based upon new need-to-know criteria. It appears the new 2017 standardized exams and need-to-know criteria are *international* in scope and do not contain or reference U.S. federal regulatory content. It appears the 2012 national standardized operator certification exams are now static and are no longer being reviewed or updated. Some state water/wastewater operator credentialing entities have or are transitioning to the new 2017 standardized operator certification exams by requiring candidates take state-specific regulatory training as a condition of credential eligibility (in-lieu of testing candidate knowledge of applicable public health regulations and rules). Some states have regulations and rules that are more stringent than the federal SDWA or federal CWA regulations and rules. The U.S. Environmental Protection Agency (USEPA) is the “primacy” agency and has regulatory authority over implementation of the federal SDWA and federal CWA on federal trust tribal lands (reservations). It is the intent of the ITCA Program to develop Federal Baseline Regulatory Exam Modules such that operator certification candidates who are working on federal trust tribal lands would take two exams: (1) a new 2017 standardized operator certification exam; and (2) an applicable Federal Baseline Regulatory Exam Module. The two exams would be handled independently and separately (i.e., test scores would NOT be combined). Therefore, candidates would be required to achieve a passing score on both exams to be eligible for certification.

- 
- 3. Who is the intended audience and practice group for these certifications? Is it exclusively for practitioners in Indian Country?**

The primary audience / practice group are those operator certification candidates who are or will be operating a water or wastewater system / facility on federal trust tribal lands. ITCA intends the job analyses and exam forms will be specifically for this primary audience / practice group. However, this endeavor will NOT be exclusively for practitioners in Indian Country. Other credentialing entities will be using or in the future may desire to use the

Federal Baseline Regulatory Exam Modules (exam forms and/or exam questions).

For example, in the case of a jurisdiction where a delegated primacy agency has regulations and rules that are essentially the same stringency as the federal regulations and rules, the Federal Baseline Regulatory Exam Modules (exam questions and exam forms) may be useful. Alternatively, in the case of a jurisdiction where a delegated primacy agency has regulations and rules that are more stringent than federal regulations and rules, the Federal Baseline Regulatory Exam questions may be useful. Therefore, ITCA will be working with one or more local jurisdiction partners in the development of the Federal Baseline Regulatory Exam Modules. Use of the Federal Baseline Regulatory Exam Modules will be contingent upon commitment to assist with the long term maintenance of the Baseline Regulatory Exam Modules, as governed by ITCA and partnering consortium members.

---

**4. On page 21, ITCA notes that “The five types of operator credentials can be grouped into three operator credentialing ‘Programs’ – Water Treatment, Water Distribution, and Wastewater.” Based on the RFP’s notation that three job/task analyses will be done, one for each of these programs, it would appear that the result of each job/task analysis would be one certification. Can ITCA clarify if this is ITCA’s assumption? Or is ITCA assuming that there will be multiple certifications within each of the three “Programs”?**

The ITCA Program will continue to offer the following existing types of operator certifications.

**Drinking Water Certifications**

**Wastewater Certifications**

Very Small Water System

Water Distribution-Level 1  
Water Distribution-Level 2  
Water Distribution-Level 3  
Water Distribution-Level 4

Wastewater Collection-Level 1  
Wastewater Collection-Level 2  
Wastewater Collection-Level 3  
Wastewater Collection-Level 4

Water Treatment-Level 1  
Water Treatment-Level 2  
Water Treatment-Level 3  
Water Treatment-Level 4

Wastewater Treatment-Level 1  
Wastewater Treatment-Level 2  
Wastewater Treatment-Level 3  
Wastewater Treatment-Level 4

Each of the existing types operator certifications listed above has an existing corresponding standardized certification exam(s) (both 2012 and 2017). What is being proposed is the creation of smaller regulatory exam modules that will be coupled to the corresponding (and already existing) operator certification exams. For example: both a passing score on Water Distribution-Level 1 (2017 standardized exam) and a passing score on a corresponding Federal Baseline Regulatory Exam Module would be required to meet ITCA eligibility criteria for Water Distribution-Level 1 operator certification.

The term “*operator credentialing program*” was used to describe general possible areas of similarity or genres where the applicable federal baseline regulations may equally apply to more than one type of operator certification.

For example, the exact same existing federal baseline regulations and rules regarding drinking water distribution may equally apply to both a water system that is classified as a very small water system and a water system that is classified as a Level 1 water distribution system.

As another example, federal baseline regulations and rules regarding *water* treatment are vastly different from the federal baseline regulations and rules regarding *wastewater* treatment. The federal SDWA regulations and associated rules govern drinking water, whereas the federal CWA regulations and associated rules govern wastewater.

- 
- 5. ITCA indicates the need for different “modules” for each of the three ITCA programs. Can ITCA explain what it means by “modules?” How do the modules associated with a certification relate to the achievement of certification? E.g.:**
- a. Is ITCA anticipating that a candidate must complete several modules, all of which consist of different examination forms with different blueprints and passing points, to earn one certification under one program?**
  - b. Or, is a “module” the same thing as a certification, meaning that each examination module passed results in a different certification under a particular program?**
  - c. Or, is ITCA’s reference to “modules” meant to refer to what is commonly seen as “domains” or “areas of practice” in a job/task analysis study, meaning that each program is one certification, and each module is a domain area?**

Of the three bulleted meaning scenarios posed in the above question, the third (“c”, the term “domains”) is the most apropos. However, as state in the RFP, the applicability of specific federal baseline regulations to water or wastewater facilities/systems is dependent upon individual circumstances and might not directly correspond to the facility/system level or to existing O&M operator credential levels.

For example, under the federal SDWA, some rules are crosscutting no matter what the facility/system classification level. Crosscutting examples include the Revised Total Coliform Rule, the Lead and Copper Rule, and the Public Notice Rule. However, some SDWA rules can correspond to a primacy agency’s facility classification system. For example, under the federal SDWA, the Surface Water Treatment Rule and Arsenic Treatment Rule both typically apply to public water systems that are classified as level 2 or higher.

- 6. We understand that the new federal baseline regulations affecting Indian Country will be the basis of the new certifications. However, it appears that these baseline regulations have not yet been released. Is ITCA anticipating that these will be released by the EPA in time to begin the first job/task analysis study in July 2018? What is ITCA's plan if EPA's new baseline regulations are not released by then?**

New federal baseline regulations are not driving the need for the proposed work. Existing regulations and rules of the federal SDWA and federal CWA will be the basis for this work. Nonetheless, both the federal SDWA and the federal CWA specify ongoing evaluation for the possible need to develop changes or new regulations and rules to address threats to public health and the environment. ITCA and its partners are committed to psychometrically maintaining these Federal Baseline Regulatory Exam Modules over time, especially when changes are made to the federal regulations and rules.

- 7. To confirm, it is adequate for the selected vendor to be SAM (System for Award Management: [www.sam.gov](http://www.sam.gov)) registered? Or, does ITCA require the selected vendor to be GSA registered?**

The RFP describes all known conditions and requirements associated with this proposed project. The RFP does not reference GSA registration.

- 8. Does ITCA anticipate any issues with recruiting subject matter experts/stakeholders for the job/task analysis meetings, given the scope? Based on an initial review, each job/task analysis meeting may need a minimum of 15 to 18 participants to allow for representation from all impacted areas. Will the same subject matter experts/stakeholders be used for each job/task analysis meeting, or will there be a pool of up to 45 subject matter experts/stakeholders who would be available to participate in these activities? We like to consider the time and commitment required by the subject matter experts/stakeholders as part of the proposed solution.**

Recommended strategies for recruiting volunteer subject-matter expert (SME) stakeholders for this project is one of the required elements that bidders must describe in their written technical proposals (see *RFP Exhibit D – Technical Proposal Specifications*, “The narrative description must provide specific details including:...and any recommended strategies concerning stakeholder representation.”). Obviously, messaging and marketing will be a key aspect of this endeavor and bidders are expected to describe their expertise in this regard and their expected level of effort in assisting ITCA. ITCA anticipates being able to offer participant travel expense reimbursement stipends and the hosting venue locations for exam development meetings will be rotated throughout the U.S.

**9. As part of the job/task analysis validation, does ITCA anticipate having a large enough pool of subject matter experts for multiple validation surveys (minimally one survey per program)?**

See the above response to question 8. In addition, we direct your attention to RFP Exhibit B – Statement of Work and Deliverables, which states the following on page 22.

*The federal baseline regulatory exam module development process will involve stakeholder representation comprised of volunteer subject-matter experts from the three categories listed below. Many of the primary steps described above will require face-to-face workgroup meetings of volunteer subject-matter expert representatives from these three categories. These workgroup meetings will be held at various hosting locations throughout the continental United States. The Contractor will work closely with ITCA in determining stakeholder representation that is appropriate for the each specific primary step.*

- *Operators and water utility personnel from tribes and partnering jurisdictions*
- *Regulations experts from federal and state agencies, including the U.S. Environmental Protection Agency, the Indian Health Service, and the Arizona Department of Environmental Quality*
- *Partnering subject-matter experts such as technical assistance providers and industry organizations*

There is already at least one state credentialing agency that is partnering with ITCA on this endeavor. In Indian Country alone, there are approximately 1,000 public water systems and the ITCA Program contacts list contains over 1,100 individuals.

---

**10. As written, the ITCA RFP does not include test delivery. What is the scope of work for item analysis anticipated by ITCA in this RFP? E.g., beta testing of the new examination forms/modules with statistical analysis?**

Through existing membership and contractual arrangement, ITCA uses the exam testing services of the Association of Boards of Certification (ABC), including computer-based testing services of PSI. Therefore, test delivery of the Federal Baseline Regulatory Exam forms/modules will be performed by ABC and PSI for both beta testing and post-beta testing.

The objective of this RFP is to obtain a contractor to guide and facilitate the psychometric development of federal baseline regulatory exam modules that will be used in the process of credentialing drinking water and wastewater system operators. Strategy recommendations for item analysis, beta testing, and statistical analysis for this project are expected to be described in detail in the bidder's written technical proposals.

---

***11. Is the proposed timeline based on external factors, such as Federal laws indicating that these credentials must be in place by a certain time? Or is the timeline merely an illustrative one to indicate ITCA's interest in completing this work as soon as possible?***

As stated in response to question number 6, existing regulations and rules of the federal SDWA and federal CWA will be the basis for this work. It appears the 2012 national standardized operator certification exams are now static and are no longer being reviewed or updated. Therefore, time is of the essence to develop an assessment that bridges the regulatory gap that may exist in the new 2017 international standardized operator certification exams. The timeline proposed in the RFP is additionally based on ITCA funding timelines.