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January 16, 2025

Diane Baxter, Chair and Terry Wood, Executive Director
Board of Registration of Hazardous Waste Site Cleanup Professionals
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, 9th Floor
Boston, MA 02114

Subject: LSPA Suggestions for Improving the LSP Application and Exam Experience

Dear Ms. Baxter and Ms. Wood:

The LSP Association (LSPA) is writing with suggestions for improving the experience of applying for approval to take, and thereafter taking, the LSP exam. After over 30 years and at least as many exam offerings, and along with feedback from LSPA members, we think we have suggestions that are worth discussion and serious consideration.

As you know, over the past ten years the total number of LSPs has fallen by about 100 as increasing numbers of LSPs are reaching retirement age. Succession planning has become a topic of concern at individual firms as well as at the LSPA. At a meeting with the LSPA this past spring, MassDEP leaders in one region raised their concerns about a shortage of LSPs. There are professional incentives for experienced waste site cleanup professionals who are not yet LSPs to apply to take (and pass!) the licensing exam. It is in this context that we have heard suggestions for updating and modernizing the application and exam experience.

During November 2024, the LSPA surveyed LSPA members, both LSPs and non-LSPs, on the topics of

- Demographics;
- Employment Details;
- Typical Salaries/Benefits; and
- Reducing Impediments to LSP Licensure.

We were pleased that 257 members responded.

While there were many interesting survey findings that the LSPA will consider as we embark on strategic planning and other initiatives, we want to share those that apply specifically to the

licensing process through the LSP Board of Registration. They echo and confirm what we have been hearing anecdotally over the years. Specifically, suggestions can be organized in four areas:

- Streamline and simplify the LSP exam application;
- Update existing study information, provide additional study information, and provide opportunities for practice exams;
- Allow digital MassDEP documents, including guidance and policy documents, as user resources during the exam; and
- Provide more transparency around exam pass rates and test frequency.

To be clear, by offering these suggestions the LSPA is not endorsing a lowering of standards and expectations for becoming an LSP. Rather we are suggesting approaches for prospective LSPs to more effectively communicate their professional experiences and preparedness to the LSP Board. We are also acknowledging a shift in how LSPs use reference documents in their practice. More information on each topic is provided below.

Streamline and simplify the LSP exam application. Two recent changes have been extremely helpful in ameliorating some issues regarding the cumbersome nature of the forms: 1) moving the application online and allowing an electronic submittal, and 2) changing the format from Word to PDF. This is much appreciated. However, our members still report that the LSP application is a time-consuming and daunting process further complicated by a format that is repetitive and not very user-friendly. They report that this is the primary hurdle to the process. The application format is frequently mentioned as a deterrent to applying to take the exam. While it is unknown to us for how many years the same application has been in use, the LSPA recommends a thorough review with an eye toward streamlining and simplifying the several forms. For example, what information is most valuable and useful to Board reviewers? Would it be possible for Board reviewers to adequately evaluate applicants with a bit less information? Might streamlining also reduce the time needed for the Application Review Panel?

Specific suggestions include:

- Revisit the number and types of forms. Consider which forms are actually the most useful to the Board and focus on those. One idea might be to ask applicants to submit a professional resume, and specify what information it should include. This might address many of the elements requested on the Relevant Professional Experience (RPE) and Total Professional Experience (TPE) position forms. Consider whether the Board could make determinations based on a professional resume with project descriptions and summarized information on level of decision making.

- Providing more space to type answers. Currently, if the space on the form is used in its entirety, then the font size reduces in order to fit into the box. Depending on the amount of text included, this can make the font very small. In addition, if there is a change in the space provided on a form, it would be helpful to know if it reflects a change in LSP Board expectation about the level of detail to be provided on that form.
- Consider the degree to which information from the RPE position form is replicated in the RPE project description form, and streamline the project description form if possible. One's position usually correlates quite well with the type of work performed, so there can be a lot of duplication between a description of project work and the position description in general.
- The phrasing of some of the questions makes it challenging to know how to answer and to what depth. For example, the "Fields of Expertise" request is unclear; what are the fields that the Board would like to see information on?
- Consider adding sections with checkboxes that condense information down, such as "Decision Maker on Sites with the Following Contaminants/Issues" or "Primary Author of the Following MCP Reports."
- Consider adding version numbers to the application so that applicants know they are working on the most current version. Since drafting the application can occur over many months, an applicant might start their effort using one form and then find that the form has been updated. It doesn't appear that there would be any way to know this aside from making a specific comparison.

Update existing study information, provide additional study information, and provide opportunities for practice exams. Study materials, review courses, and practice exams have all been mentioned by LSPA members as opportunities that would be appreciated and would seem to assist in supporting future LSPs. At the very least, some of the information on the LSP Board website could be updated, including the Master Content Outline and the Reference List for LSP Licensing Examination. For an explicit example, we have received feedback that more reference materials focused on remediation technologies would be helpful.

Allow digital MassDEP documents, including guidance and policy documents, as user resources during the exam. A paper version of the MCP is provided to each exam taker to reference during the exam. The LSPA suggests that the MCP also be provided in digital format for reference during the exam. This is a more accurate real-world resource than a paper copy. In addition, there are dozens of MassDEP BWSC guidance documents and policies that an LSP might reference; the list grows longer annually. It seems reasonable to include these electronically in the resources available to exam takers. All active LSPs make use of these digital tools regularly to ensure they

are referencing the most current MassDEP information; for example, the Shortforms document can change several times a year. The LSP exam should be testing the real-world application of the regulations and other documents. As a point of comparison, those taking the Professional Engineering exam in Massachusetts are provided a pdf version of electronic reference documents on their exam room computer.

Provide more transparency around exam pass rates and test frequency. The LSP Board does not currently publish exam statistics, such as what percent of correct answers is required to pass the exam, pass/fail rates by test, distribution of those who pass the exam the first time/second time, and others. Doing so could help applicants and exam takers adjust their expectations, demonstrate that it is okay to fail on an exam attempt, and support success. In addition, while the LSP Board is only required by regulations to offer the exam once a year, it would be helpful to standardize the schedule so that candidates know when the exam is consistently going to be offered. Knowing that the test would be offered annually in October, for example, would allow for realistic personal and professional career planning. This would benefit the Board as well in terms of predictability. The LSP Board could establish its own deadline for applicants for that October exam. For additional consideration, offering the exam more than once a year would provide additional options and potentially spread out the workload for application reviewers.

Thank you for reading our suggestions. We respectfully encourage you to share this letter with the full LSPA Board and staff to stimulate conversation and consideration. The LSPA is available at your convenience to discuss any of our suggestions and to assist with implementation as appropriate. Please do not hesitate to contact Joe at 781-721-4136 or Wendy at 617-417-4351 with any questions or concerns.

Respectfully,

THE LSP ASSOCIATION, INC.

A handwritten signature in blue ink, appearing to read 'Joe Roman'.

Joseph Roman, LSP, President

A handwritten signature in blue ink, appearing to read 'Wendy Rundle'.

Wendy Rundle, Executive Director