



California Stormwater Quality Association®

CASQAlert!

2022 CGP Additional Prerequisite Course Approval Information

We have received several inquiries regarding the new prerequisite courses approved by the State Water Resources Control Board (State Water Board) for the Qualified SWPPP Developer (QSD) and Qualified SWPPP Practitioner (QSP) qualifications. Based on the inquiries received, we are providing the following information.

Overview of the 2022 Construction General Permit (CGP) Prerequisite Course Changes

In September 2022, the State Water Board adopted the 2022 Construction General Permit (CGP), which introduced changes to the QSD and QSP qualification process. A key change from the 2009 permit is the authority for the State Water Board to accept alternative prerequisite courses in addition to those originally identified in the 2009 permit. Specifically, the State Water Board's Division of Water Quality Deputy Director may approve qualifications for additional prerequisite courses for QSD and QSP certification.

Per Section V.H. of the 2022 CGP, individuals can recommend new prerequisite courses for consideration. The Construction General Permit Training Team (CGPTT), detailed below, is tasked by the permit with reviewing these recommended courses and providing input to the State Water Board's Deputy Director of Water Quality.

To provide clarity and transparency in this process and to obtain input, State Water Board staff asked the CGPTT to develop a draft list of minimum criteria for new prerequisite courses. The prerequisite subcommittee of the CGPTT developed draft criteria, which were then reviewed by the full CGPTT. These draft criteria were provided to the State Water Board for their consideration. In January 2024, the State Water Board published their ["2022 CGP Additional QSD & QSP Prerequisite Criteria."](#)

The State Water Board's document provides the framework for evaluating additional prerequisites. If a new prerequisite course is submitted, the course is reviewed by staff from the State and Regional Water Boards who are part of the CGPTT, with recommendations made to the State Water Board's Deputy Director of Water Quality. If approved, the prerequisite course is posted on the State Water Board's [2022 CGP webpage](#).

Background on Why New Prerequisite Courses Were Included in the Permit

The State Water Board's 2022 CGP Additional QSD & QSP Prerequisite Criteria document provides background on why the 2022 CGP allows for new prerequisite courses. For ease of reference, we have included that information here:

"With the adoption of the 2009 Construction Stormwater General Permit (2009 CGP), the State Water Board created the California QSD and QSP certifications to ensure consistent development and implementation of Stormwater Pollution Prevention Plans (SWPPPs) to comply with the permit requirements. The 2009 CGP established several prerequisite options for the QSD and QSP certification, ensuring individuals pursuing certification have fundamental knowledge of construction stormwater management. Since the adoption of the 2009 CGP, some of the prerequisite options were discontinued. The remaining prerequisites rely heavily on years of experience preventing new stormwater professionals from obtaining the necessary QSD or QSP

prerequisites. Due to the limited number of approved prerequisites for QSD and QSP certification, the 2022 CGP includes a provision (Section V.H.) to allow for the consideration of additional training courses as valid prerequisites. Additional approved prerequisites will provide more pathways for new stormwater professionals to obtain QSD and QSP certifications and consequently, support the expanded construction stormwater QSD and QSP responsibilities in the 2022 CGP.”

About the CGPTT

The CGPTT was formed by State Water Board in collaboration with CASQA in 2008 to develop the CGP Training Program. The CGPTT works cooperatively with the State Water Board and CASQA on the CGP Training Program, with the overall goal to achieve higher levels of compliance with the CGP. The CGPTT is a collaborative group of construction stormwater and erosion and sediment control professionals and trainers that provide construction specific knowledge, perspectives, and expertise, including construction BMP implementation, training development, specialty BMP application, with a diverse representation, including but not limited to linear utilities, transportation, the building industry, MS4s, the State Water Board, Regional Water Quality Control Boards, and CASQA. The CGPTT includes five subcommittees: Content Subcommittee, Deployment Subcommittee, Exam Subcommittee, Trainer of Record Qualifications and Oversight Subcommittee, and the QSD/QSP Prerequisites and Qualifications Subcommittee. Individuals who are interested in serving on the CGPTT are encouraged to respond to a Request for Qualifications, released periodically by CASQA and the State Water Board when positions are open. The next RFQ anticipated for release will be in October 2024. The release of the RFQ will be announced through State Water Board’s GovDelivery list serve, CASQA’s Bi-Weekly Update, and directly to active Trainers of Record and QSDs.

Contact Information

- For questions regarding prerequisite courses, please contact the State Water Board at stormwater@waterboards.ca.gov.
- For questions related to the QSD and QSP training program, contact CASQA at CASQA@casqa.org.