



Health and Human Services  
Division of Public Health

## **Bureau of Radiological Health Radon Program**

# **Application Guide Iowa Radon Mitigation Specialist Credentialing**

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## 1. Introduction

**ATTENTION:** On July 1, 2022, the Iowa Department of Public Health (IDPH) and the Iowa Department of Human Services (DHS) merged to become the Iowa Department of Health and Human Services (Iowa HHS or HHS). Therefore, you may see references to IDPH in old documents, rules, web sites, email addresses and other documents and online resources.

### 1.1 Overview

This guide explains the requirements and process for applying for the first time as a “Radon Mitigation Specialist” under IAC Chapter 44, “Minimum Requirements for Radon Mitigation”.

In order to become credentialed in Iowa as a radon mitigation specialist there are certain qualifications that must be met along with specific training and examination, see Section 1.2. This guide explains the qualifications you need to apply for credentialing like work experience and/or education. Read Section 2.2 carefully to make sure you have the necessary experience and/or education to qualify for registration before taking any classes.

**Under 641-44.3 (136B) General Provisions** - A complete application must be filed on a form or other electronic document as prescribed by the department and shall contain complete and accurate information. A person must individually qualify under a certain set of conditions in order

for the application to be acceptable. An application must show positive proof the applicant meets all of the credentialing requirements. You will be prompted to upload/submit, **all** of the following information and supporting documents outlined in Section 2 with your completed application.

Under 641--44.4(2) in addition to the information outlined in this guide the department may require the applicant to submit supplementary statements containing additional information to enable the department to determine whether an application should be approved or denied, or whether a previously issued credential should be amended, suspended, or revoked.

This guide will also help you to prepare all the information and documentation you will need to have available when you are ready to apply for credentialing The HHS Radon Program uses the division’s online AMANDA licensing portal so you will need access to a computer with internet access. You should have all documents ready in electronic format when you are ready begin your application process. If you cannot convert your documents to an electronic format or if you do not have access to a computer or the internet, please contact the Radon Program at (515) 281-4928.

### 1.2 Definitions

“AARST/NRPP or NRPP” means American Association of Radon Scientists and Technologists/National Radon Proficiency Program; [www.aarst-nrpp.com](http://www.aarst-nrpp.com) or [nrpp.info](http://nrpp.info)

“ASTMI and ASTM E2121” means American Society for Testing and Materials International, ASTM E2121 - Standard Practice for Radon Mitigation Systems in Existing Low-Rise Residential Buildings; [www.astm.org](http://www.astm.org)

“EPA and EPA RMS” means U.S. Environmental Protection Agency, Radon Mitigation Standards (EPA 402-R-93-078, Revised April 1994); [www.epa.gov/radon](http://www.epa.gov/radon)

“IAC” means the Iowa Administrative Code

“IEA” Indoor Environments Association, formerly AARST (transition to this new name started in late 2023)

“Iowa HHS” or “HHS” means the Iowa Department of Health and Human Services; [hhs.iowa.gov](http://hhs.iowa.gov)

“NRSB” means National Radon Safety Board; [www.nrsb.org](http://www.nrsb.org)

Regulations and Standards (IAC 641—44.3(4) c. & 44.5 16.)

A copy of Iowa Code 136B RADON TESTING and Iowa Administrative Code 641 Chapter 44 “MINIMUM REQUIREMENTS FOR RADON MITIGATION” can be found at the department’s radon website: [hhs.iowa.gov/radiological-health/radon](http://hhs.iowa.gov/radiological-health/radon). The website also has other useful resources.

A credentialed mitigation specialist shall comply with department standards and all the requirements as stated in EPA’s Radon Mitigation Standards (RMS) EPA 402-R-93-078, October 1993 (Revised April 1994) and ASTM E2121. A copy of the EPA RMS is available from the HHS Radon Website, [hhs.iowa.gov/radiological-health/radon](http://hhs.iowa.gov/radiological-health/radon), scroll down to the **Fix** section at towards bottom and click on it. Copies of ASTM E2121 can be purchased from the ASTM website at [www.astm.org](http://www.astm.org).

Be advised the Iowa Mitigation Rule states that all “shoulds” will be designated as “shalls” in any EPA and ASTM documents.

Per Chapter 44 and the above standards, a credentialed mitigator must also comply with all federal, state, or local statutes, codes and regulations (i.e.: National Electrical Code, Fuel Gas Code, National Fire Code, etc.).

### **1.3 Initial Training and Examination Requirements (IAC 641—44.3(2) c.)**

To become credentialed as an Iowa Radon Mitigation Specialist you must complete a department approved initial radon measurement class (pre-requisite to the mitigation course), an initial radon mitigation class and pass a department approved mitigation proficiency exam (You do not need to take the measurement exam unless you also want to be certified as a radon measurement specialist). Be aware that there are also “technician or Installer” classes and exams offered that do not satisfy our course and exam requirements.

**Approved Training Course** – A department approved initial training course is a course approved and accepted by either the NRPP for their Radon Mitigation Specialist (RMS) certification or the NRSB for their Radon Mitigation Specialist (RSS) certification. Other training classes or exams will be approved on a case-by-case basis.

An initial radon measurement specialist training courses should have a minimum of 16 hours of classroom instruction and an initial radon mitigation training courses should have a minimum of 24 hours of classroom instruction that includes active participation in radon mitigation techniques.

Lists of approved classes for both measurement and mitigation can be found at the following links:

- NRPP: <https://nrpp.info/education-training/initial-training-courses/>, or (828) 348-0185
- NRSB: <https://nrsb.org/> click on Education  or (866) 329-3474

In the past the Kansas State University (KSU) Engineering Extension has offered classroom-based training in Iowa, however, these have not been held in the last couple of years due to lack of student sign up. Please check with KSU, [radoncourses.com](http://radoncourses.com) or (833) 723-6222, for availability. Other in person classroom options may be available in surrounding states or through other training providers by checking the above national organization’s respective training list.

Please remember that the Iowa Radon Testing and Abatement Act and the Minimum Requirements for Radon Mitigation Rules and all other Iowa specific regulations and policies supersede any conflicting information that may be dispensed in these national training courses. It is the Iowa Radon Mitigation Specialists responsibility to ensure that they are aware of all Iowa radon requirements and standards, some of which vary from national standards or protocols or those from other states.

**Approved exam** – A department approved exam is an exam accepted for certification by either of the two national certification organizations; the NRPP or NRSB. You will need to use the links below to take the exam through either the NRPP or NRSB (a course completion quiz/exam given at the end of an online course is not sufficient). You must receive a passing score on the exam.

- NRPP: Exam information: [nrpp.info/nrpp-exams](http://nrpp.info/nrpp-exams)
- NRSB: Exam: [www.nrsb.org/exams/exam-information](http://www.nrsb.org/exams/exam-information)

As a reminder, you do not have to take the certification exam for measurement unless you also want to get an Iowa Radon Measurement Specialist certification.

**NOTE 1:** Completing the above classes and obtaining an Iowa Radon Mitigation Specialist credential does not allow you to perform radon testing such as pre or post mitigation system installation testing that is provided to clients. To provide pre or post mitigation radon testing services you must also obtain an Iowa Radon Measurement Specialist certification. This requirement would not include radon monitoring done as part of a worker protection program. The additional requirements to obtain a measurement certification would be to take the measurement exam and follow the instructions for submitting a measurement specialist application.

**NOTE 2:** A course and exam for certification through NRPP as a Mitigation Installer (RMI) is not accepted for Iowa radon mitigation specialist credentialing.

**NOTE 3:** By taking a certification exam through one of the above organizations you will be eligible to apply for their respective national certification(s), however you do not have to become certified through either of the above-mentioned national certification organizations to get your Iowa measurement certification and/or mitigation credential.

#### **1.4 Initial Application & Credentialing Fees (IAC 6741—44.4(6) a.)**

The following fees must be paid at time of application. An application will not be processed until the appropriate fees are paid.

- a. A nonrefundable initial application fee is \$25 for Iowa residents and \$100 for nonresidents.
- b. Credentialing fee of \$150. This fee is refundable if credentialing is not completed.

Therefore, the total credentialing fee for an Iowa resident is \$175 and nonresident is \$250.

## 2. Required information and Documentation for Application

### 2.1 Age Requirement/Birthdate (IAC 641—44.3(2) a.)

An individual must be at least 18 years of age to obtain credentialing. The applicant's birth date must be provided. Additional documentation proving the applicant's age verification may be requested.

### 2.2 Work Experience/Education (IAC 641—44.3(2) b.)

The applicant must possess **3 years** of relevant professional work experience and/or relevant post-secondary education. Up to 2 years of relevant post-secondary education can be substituted for work experience.

- **Relevant professional work experience** includes the design or construction of buildings, or associated heating, ventilation, and air-conditioning systems, or closely related activities approved by the department. The following work related areas can be used to show the appropriate type of work experience, but is not all inclusive:
  - Heating & Cooling (HVAC) installation and/or maintenance
  - Plumbing installation and/or maintenance
  - Carpentry framing, finishing, installation and/maintenance
  - Remodeling installation and/or maintenance
  - Drywall Installation
  - Electrical installation and/or maintenance
  - Roofing installation and/or maintenance
  - Waterproofing installation
  - Radon mitigation installation
  - Concrete-basement pours, slab on grade, driveway-side walk building construction related installation
  - Brick laying (Masonry) installation and/or maintenance
  - Maintenance relating to building construction
  - Trenching relating to building construction
- **Relevant post-secondary education** includes universities and colleges, as well as accredited trade and vocational schools or other accredited training programs. Post-secondary curriculum must be in one or more of the following areas:
  - Architecture,
  - Engineering,
  - building construction,
  - the physical sciences which include chemistry, geology, physics, and atmospheric sciences, or
  - other curriculum as approved by the department

One year of post-secondary education consists of a minimum of 24 semester hours, of which at least ten hours must be in the above subject areas, or 36 quarter hours, of which at least 15 hours must be in the above subject areas.

### **2.2.1 To use work experience only:**

To meet the 3 year relevant work experience requirement the applicant must provide proof in the form of a detailed resume that includes the following information for each employer:

- Company/employer name, address and contact information.
- Dates of employment from mm/yyyy to mm/yyyy
- Approximate hours worked per week, month or year
- A detailed description of job functions or work performed, and responsibilities.

### **2.2.2 To use post-secondary education and work experience:**

To use a combination of work experience and post-secondary education (up to 2 years) to qualify the following must be provided:

- a. A detailed resume as outlined in Item 2.2.1 demonstrating relevant hands on fulltime experience in one of the construction trades listed in Item 2.2.1 for each year not covered by post-secondary education in Item a. above.
- b. A college transcript(s) demonstrating post-secondary education in one or more of the disciplines listed under section 2.2 for each year, up to 2 years, not covered by work experience in Item a. above.

**NOTE:** The 16 hour radon measurement and 24 hour radon mitigation course taken to satisfy the requirements for this credential do not count towards qualifying post-secondary education.

### **2.3 Training Course Completion and Test Verification**

The applicant must submit/upload a copy of the following documents at time of application so make sure you have electronic copies available:

- 1) The completion certificates for an approved initial radon measurement and an initial radon mitigation course.
- 2) The NRPP or NRSB mitigation examination completion letter indicating you have passed the exam.

### **2.4 Radon Affirmation Statements**

You must acknowledge that you agree to the following statements included in the online application process:

- 1) I will keep all records for a minimum of 5 years after the radon mitigation installation is completed.
- 2) I will submit any changes in QA/QC procedures within 14 days to Iowa HHS.
- 3) I will conduct business in accordance with all local building codes and ordinances and within the standards, guidelines and protocols established and referenced by EPA, ASTM E2121 and NRPP guidelines and protocols.
- 4) I am uploading a QA\QC plan for mitigation.
- 5) I am Uploading a Worker Protection Plan
- 6) I am uploading a copy of an installation manual that will be provided to the home owner after each installation.
- 7) I am uploading a copy of the Iowa Workforce Development Contractor Registration for my current employer(s) or application (if self-employed).
- 8) I will enter details for each mitigation job I conduct during the renewal cycle on the Mitigation Systems Installed tab prior to submitting renewal payment annually.

## 2.5 Affirmation Questions

The following questions are required to be answered as part of the application process and are included in the online application. If a “Yes” answer is provided and additional documentation is required, please have the documentation ready for upload/submittal.

- 1) Do you have a medical condition, which in any way currently impairs or limits your ability to perform the duties of this profession? “Medical condition” means any physiological, mental, or psychological condition, impairment, or disorder, including drug addiction and alcoholism.  
*If yes, provide a description of your condition and submit a letter from a physician stating how your condition will affect your ability to perform the duties of this profession.*
- 2) Have you, within the past 5 years, engaged in the illegal or improper use of drugs or other chemical substances?  
*If yes, provide a statement and a copy of relevant documentation including records from a physician or treatment program.*
- 3) Have you ever been convicted of a misdemeanor or felony crime? (You do not need to answer yes if your sole conviction or convictions are for minor traffic violations with fines under \$250). In answering this question, note that a conviction means a finding, plea, or verdict of guilt made or returned in a criminal proceeding, even if the adjudication of guilt is deferred, withheld, or not entered. This means you must answer yes if a finding or verdict of guilt was returned against you in a criminal proceeding or if you plead guilty, entered a plea of nolo contendere, or entered an Alford plea in a criminal proceeding, even if the court expunged the matter or the court deferred judgment. You must submit the complaint and judgment of conviction for each offense.  
*If yes, include the date, location, charging orders, court disposition, and current status (i.e. probation) for each charge.*
- 4) Has any state or other jurisdiction of the United States or any other nation ever limited, restricted, warned, censured, placed on probation, suspended, revoked, or otherwise disciplined a professional license, permit, registration, or certification issued to you?  
*If yes, include the date, location, reason, and resolution.*
- 5) Have there ever been judgments or settlements paid on your behalf as a result of a professional liability case?  
*If yes, include the date, location, reason, and resolution.*
- 6) Have you ever had a license, permit, registration, or certification denied, suspended, revoked, or otherwise disciplined by a certification body?  
*If yes, provide a description of the circumstances.*

Per IAC 641--43.4(2), the department may require the applicant to submit supplementary statements containing additional information to enable the department to determine whether an application should be approved or denied, or whether a previously issued certification should be amended, suspended, or revoked.

## 2.6 Quality Assurance/Quality Control (QA/QC) plan (IAC 641—44.3(3) b.)

Applicants must submit a quality assurance plan for performing mitigation installations that addresses and includes all of the following:

- 1) All diagnostic tests performed on a building before mitigation must be spelled out to include what type of test(s) will be performed and what the purpose is for performing the test (s). Types of tests performed may include indoor ambient radon measurements, radon entry point measurements, sub- slab communication measurements, blower door



tests, etc. Diagnostic test performed must include the name (s) of the individual(s) performing the tests. Each test should be described in detail along with the manufacturer's name and model number for any equipment used. If the equipment used in performing diagnostic test(s) has a required calibration frequency issued by the manufacturer, the calibration frequency for the equipment must be documented in the application.

- 2) A complete description of the most commonly used mitigation materials and mitigation strategies offered must be documented in the plan. If an uncommon mitigation strategy is occasionally performed, a detailed description of this strategy and the materials used must also be documented in the application.
- 3) If any other related services such as pre-mitigation and post-mitigation radon measurements, soil radon measurements, water radon measurements, or other types of mitigation and measurement services are offered within your place of business or occupation, a list of those services must be fully documented in the plan.
- 4) An explanation of when the waivers as described in section 2.9 will be used and include examples of each.

A template is available upon request.

### **2.7 Worker Protection Plan (IAC 641—44.3(3) a.)**

Radiation exposure to workers must be kept as low as is reasonably achievable (ALARA). Applicants must design a mitigation worker protection plan which addresses or includes the items outlined in Section 12 of the EPA RMS and/or Section 6 of ASTM E-2121. See Section 1.3 of this guide for information on downloading a copy of the EPA RMS or to order a copy of ASTM E2121. An example WPP is available on our website;

<https://hhs.iowa.gov/radiological-health/radon/radon-testing-lab-certification-and-mitigation>

Exception: A worker protection plan is not required for a contractor who is a sole proprietor unless required by state or local regulations. However, you may want to develop and submit one so it is on file if you do add employees who will be performing radon mitigation work.

### **2.8 Installation Manual**

Provide an example of an installation manual that you would give to a homeowner for the installation of an active sub-slab or sub membrane depressurization system as required by the EPA RMS and ASTM E2121. According to Section 18.5 of the EPA RMS, and section 7.7.3 of ASTM E2121, the manual must fully explain how the system operates, where all the components are located, all warranty information, and what steps an owner must take to maintain or ensure the system is operating, including the following:

- a. Any building permits required by local code.
- b. Copies of the Building Investigation Summary and Floor Plan Sketch.
- c. Pre- and post-mitigation radon data.
- d. Copies of contracts and warranties.
- e. A description of the mitigation system installed and its basic operating principles.
- f. A description of any deviations from RMS and or State requirements.
- g. A description of proper operating procedures of any mechanical or electrical systems installed, including manufacturer's operation and maintenance instructions and warranties.
- h. A list of actions for clients to take if the system failure warning device indicates system failure or degradation.
- i. The name, telephone number and IA Radon mitigation credential number of the installer.
- j. Phone number of the state radon office; Iowa HHS Radon Program 515-281-4928.

## 2.9 Building Owner Waivers.

There are several instances in Chapter 44, where a signed waiver from the building owner for specific acts may be required. Examples of the waivers you will use must be provided with your application and the use of any waivers must be referenced in your mitigation QA\QC plan outlined in section 2.5. Copies of these signed waivers must be maintained for 5 years under the record keeping requirements of IAC 641--44.6, 4. through 6.

### A. Confidentiality Waiver.

IAC 44.3(5) states that a credential person shall:

c. Not disclose to any other person, except to the department or its agents, the addressee or owner of a nonpublic building, the radon levels present in the building or abatement measures needed or performed, unless the building owner waives this right of confidentiality in writing.

### B. Pre and/or Post-mitigation Testing Waiver.

IAC 44.3(5) states that a credentialed person shall:

d. Ensure that each building is tested for radon levels before and after mitigation work is performed. Such tests shall be of sufficient type, duration and consistency and shall be performed at such times and under such ventilation conditions as to allow for comparison of before and after mitigation radon levels. Premitigation and postmitigation radon tests shall be performed independently by a measurement specialist or technician who is not employed by the same firm as the mitigation specialist performing the mitigation. Postmitigation radon tests shall be started no sooner than one day after mitigation is completed. This requirement is not binding if the building owner waives the procedure, on a form prescribed by the department, before the mitigation process has started.

Therefore a waiver would be needed to be signed by the building owner for any of the following scenarios and before the mitigation process has started for 2-4:

1. Releasing any of the information outlined in item A above to anyone but the building owner.
2. Owner agrees to not having a pre-mitigation test done by a certified measurement specialist (i.e.: has done their own passive test).
3. Leaving a test kit for the owner or the owner obtaining his own test kit to perform the post- mitigation test.
4. When you or other member of your staff have performed the pre-mitigation test or will perform the post-mitigation test. **(Reminder: you have to be certified as an Iowa Radon Measurement Specialist to perform pre or post mitigation testing for clients)**

It is important that the waiver clearly states which of the above rights or procedures the building owner is waiving.

**NOTE: The use any of the above waivers and waiver form, their applicability and the use of the form must be referenced in your mitigation QA\QC plan outlined in section 2.6 and the waiver form included in the appendixes.**

An example of the above waivers can be found on our website at <https://hhs.iowa.gov/radiological-health/radon/radon-testing-lab-certification-and-mitigation> under the “Resources for applicants and certified/credentialed individuals” section. Click on “Mitigation Confidentiality & Testing Waiver Example” to download the ZIP file. An explanation/instructions document is also included in the ZIP file.

## 2.10 Division of Labor Registration.

Your business/company will also need to be registered with the Iowa Division of Labor within the Iowa Department of Inspections, Appeals & Licensure to perform work as a contractor in Iowa.

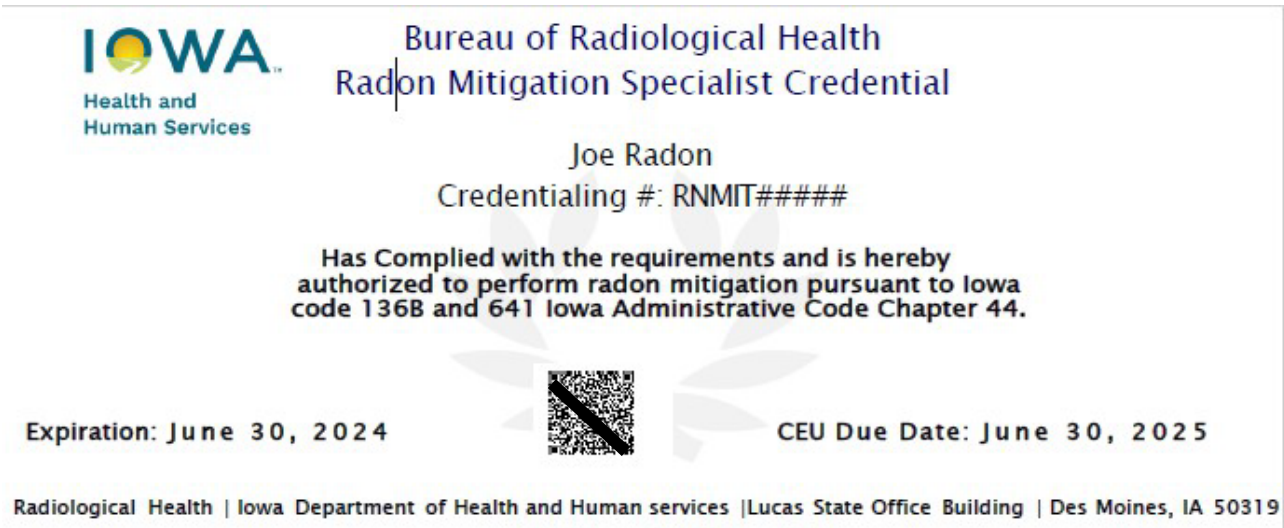
Information on contractor registration can be found here [www.iowacontractor.gov/contractor-registration](http://www.iowacontractor.gov/contractor-registration) or by calling (515) 242-5871.

## 2.11 Applying for Credentialing.

The Radon Program within the Bureau of Radiological Health uses an online licensing portal called AMANDA. This system will need to be used to submit your initial application for credentialing, submit changes to your application, complete required installation reporting, and to renew your credential. For instructions for using the licensing portal please contact program staff. Here is the link to the licensing portal where you can set up and view your account and apply for credentialing; <https://amanda-portal.idph.state.ia.us/adpereh/portal/#/commons/sign-in>

If you do not have access to a computer or internet please call the Radon Program at (515) 281-4928. Again, the application fee is non-refundable.

If approved, you will receive a wallet card via email, typically overnight. The card will show your certification number, RNMIT#####, Expiration Date (1 year after end of the month issued), CEU Due date (2 years after end of the month issued) and list of approved test methods.



If you do not receive an email with your wallet card attached, check your SPAM folder for an email from [idph.adpereg\\_noreply@iowa.gov](mailto:idph.adpereg_noreply@iowa.gov), since this is a no reply email some programs will flag it as SPAM. If found in your SPAM folder, add this email address to your safe/trusted email list.

### 3. After Credential Approval

#### 3.1 Record Keeping (IAC 641—44.5 14.)

You are required to maintain records for a period of 5 years that must include but is not limited to the following:

1. The address or location of the building.
2. The name and phone number of the owner(s) of the building where the radon mitigation is conducted.
3. A written description of each mitigation system and materials installed, diagnostic test results and cost of each system.
4. The name of the certified radon measurement specialist or technician used to perform radon or radon progeny testing before and after radon mitigation of a building. This requirement does not apply if the building owner has waived the testing requirement set forth in 641—subrule 44.3(5) and the mitigation specialist maintains a copy of the signed waiver.
5. The results of any initial or follow-up radon or radon progeny measurements performed and the measurement methods utilized. This requirement does not apply if the building owner has waived the testing requirement set forth in 641—subrule 44.3(5) and the mitigation specialist maintains a copy of the signed waiver.
6. The results of the post-mitigation radon measurements performed, including method of measurement and all pertinent dates. This requirement does not apply if the building owner has waived the testing requirement set forth in 641—subrule 44.3(5) and the mitigation specialist maintains a copy of the signed waiver.

The following mitigation system information is required to be reported via your account on the online portal (AMANDA) as part of your credential renewal. You can enter the information as the mitigation systems at any time during the licensing period but must be completed but must be entered at time of renewal to calculate your renewal fee, see below for more information on renewal fees. The information to be reported includes:

- Building Owner Name
- Building Owner phone number
- Physical address of installation including street address, City State and Zip.
- Installation date
- Employer at time of installation

Instructions for entering mitigation systems installed information can be found here:

<https://hhs.iowa.gov/radiological-health/radon/radon-testing-lab-certification-and-mitigation>

#### 3.2 Application Changes.

Any changes to your application such as change of employer shall be made to the department within 14 days of occurrence. This will require submission of new documents outlined in sections 2.5 through 2.8 above. You will also be responsible for coordinating payment for all mitigation systems you installed for your previous employer, see Section 3.3 below.

### 3.3 Credential Renewal (IAC 641—44.4(4) & (6) b.).

A credential is valid for one year and must be renewed yearly by the last day of the month in which their certification was approved and issued and can be found on the wallet card issued to the applicant. The renewal fee is \$150 or a mitigation system installation surcharge fee of \$40 per mitigation system installed (as defined in 641—44.2(136B)) costing more than \$200, whichever is greater. With each renewal, a credentialed person must submit legal documentation of the number of mitigation systems installed the previous credentialing year. Reporting mitigation system installations is done via your account in AMANDA.

Instructions for renewing your Iowa mitigation credential and for entering mitigation system installation information prior to renewal can be found here:

<https://hhs.iowa.gov/radiological-health/radon/radon-testing-lab-certification-and-mitigation>

- decide not to renew your credential the following year, all surcharge fees for the mitigation systems you have installed since your initial certification or last renewal are to be paid in full within 30 days of the date of expiration of the credential.
- If you change employers during the credentialing period you will also be responsible for coordinating payment for all mitigation systems you installed for your previous employer.

### 3.4 Continuing Education.

You are required to complete 8 hours of department-approved continuing education (CE) on either radon measurement or mitigation or both every 2 years. You will report the number of hours completed and upload a copy of you CE completion certificate(s) with the renewal it is due with. The CEU due date can be found on the wallet card sent to the applicant.

Lists of approved continuing education:

- NRPP - [nrpp.info/education-training/category-1-courses](http://nrpp.info/education-training/category-1-courses)
- NRSB - [www.nrsb.org/courses/continuing-education-courses](http://www.nrsb.org/courses/continuing-education-courses)

**NOTE:** If you have both an Iowa measurement specialist certification and mitigation specialist credential you will need to complete 8 separate hours of continuing education to renew each certification for a total of 16 hours. You cannot use the same class to renew both licenses unless it is 16 hours or combined with other approved CE hours that equals or exceeds 16 hours.