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**SENATE COMMITTEE ON  
BUSINESS, PROFESSIONS AND ECONOMIC DEVELOPMENT**  
Senator Dr. Aisha Wahab, Chair  
2025 - 2026 Regular

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<b>Bill No:</b>	AB 2477	<b>Hearing Date:</b>	June 15, 2026
<b>Author:</b>	Chen		
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<b>Urgency:</b>	No	<b>Fiscal:</b>	Yes
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**Subject:** Structural pest control

**SUMMARY:** Allows an unlicensed individual, who meets specified criteria, and is employed by a registered company to apply pesticides under the supervision of a licensed operator or field representative for a period of 60 days if specified conditions are met.

**NOTE:** *This bill is double referred to Senate Committee on Environmental Quality, second.*

**Existing law:**

- 1) Establishes the Structural Pest Control Board (Board) under the jurisdiction of the Department of Consumer Affairs (DCA) to license and regulate structural pest control operators, applicators, and field representatives, as specified. (Business and Professions Code (BPC § 8520 et. seq.)
- 2) Defines structural pest control” and “pest control” to mean with respect to household pests and wood destroying pests or organisms, or other pests that may invade households or other structures, including railroad cars, ships, docks, trucks, airplanes, or the contents thereof, the engaging in, offering to engage in, advertising for, soliciting, or the performance of, any of the following:
  - a) Identification of infestations or infections.
  - b) The making of an inspection or inspections for the purpose of identifying or attempting to identify infestations or infections of household or other structures by those pests or organisms.
  - c) The making of inspection reports, recommendations, estimates, and bids, whether oral or written, with respect to those infestations or infections.
  - d) The making of contracts, or the submitting of bids for, or the performance of any work including the making of structural repairs or replacements, or the use of pesticides, or mechanical devices for the purpose of eliminating, exterminating, controlling or preventing infestations or infections of those pests, or organisms. (BPC § 8505)

- 3) Defines a “structural pest control operator” as any individual licensed by the Board to practice structural pest control. (BPC § 8506(a))
- 4) Defines a “registered company” as any sole proprietorship, partnership, corporation, or other organization or any combination thereof that is registered with the Board to engage in the practice of structural pest control which may submit bids or otherwise contract for pest control work. A registered company may employ licensed field representatives and licensed operators to identify infestations or infections, make inspections, and represent the company in the securing of pest control work. A registered company may hire or employ individuals who are not licensed under this chapter to perform work on contracts covering Branch 1, 2, or 3, or any combination of branches, only after an operator or field representative has fully completed the negotiation or signing of the contract covering a given job. (BPC § 8506.1(a)(b))
- 5) Defines “fumigation” for purposes of the structural pest control act to mean be the use within an enclosed space for the destruction of plant or animal life, a substance having a vapor pressure greater than 5 millimeters of mercury at 25 degrees centigrade when the substance is labeled for those purposes and includes the following lethal fumigants: Methyl bromide, sulfuryl fluoride, aluminum phosphide. (BPC § 8505.1(a))
- 6) Permits fumigation to only be performed under the direct and personal supervision of an individual who is licensed by the Board as an operator or field representative in Branch 1, as specified, and defines “direct and personal supervision” for this purpose to mean that the Branch 1 licensee exercising that supervision is present at the site of the fumigation during the entire time the fumigants are being released, the time ventilation is commenced, and at the time property is released for occupancy. (BPC §§ 8505.2 and 8505.3)
- 7) Makes it unlawful for any licensee to recommend or perform any pest control corrective work under any contract or agreement that the licensee knows or has reason to know is in excess of that required to eliminate the condition for which the licensee was employed, and a violation of this prohibition is punishable by imprisonment or a by a fine not exceed \$10,000, or by both. (BPC § 8666)

**This bill:**

- 1) Defines the following for purposes of this bill:
  - a) “direct supervision” to mean the direction of actions authorized by this bill by a licensed operator or field representative who is physically present on location and immediately available to intervene.
  - b) “supervision” to mean either direct supervision or the direction of actions by a licensed operator or field representative who is immediately available to the unlicensed individual during pesticide application, either by being physically present at the site or through audio and video communication with access to the customer’s relevant information and the ability to intervene by directing onsite personnel.

- 2) Allows an unlicensed individual employed by a registered company who has applied for a structural pest control applicator examination in Branch 2 or Branch 3 to apply pesticides included in Branch 2 or Branch 3 under the supervision of a licensed operator or field representative for a period of up to 60 days, upon conclusion of a background check, if all of the following conditions are met:
  - a) The unlicensed individual has submitted a complete structural pest control applicator examination, as evidenced by written or electronic confirmation of receipt;
  - b) The unlicensed individual has completed a minimum of 80 hours of documented, in-person training in pesticide application under the direct supervision of a licensed operator or field representative.
  - c) The unlicensed individual has submitted fingerprint identification to and completed a background investigation, with the Board.
- 3) Requires the supervising licensee to maintain documentation demonstrating compliance with the requirements allowing an unlicensed person to apply the specified pesticides as authorized by this bill, including proof of completion of the required training, applicator examination application submission, fingerprint identification and background check requirements, as specified.
- 4) Specifies that the authorization period for an unlicensed person to perform Branch 2 or Branch 3 pesticides under supervision be granted only once per individual; commence upon Live Scan approval; ;not be renewed or granted again, including after failure of the examination, submission of a subsequent application, or change in employment; and terminates upon the issuance of a license, the denial of an application, or expiration of the 60-day period.

**FISCAL EFFECT:** According to the Assembly Committee on Appropriations, SPCB, anticipates minor and absorbable costs.

**COMMENTS:**

1. **Purpose.** This bill allows unlicensed personnel to provide certain pest control services under supervision of a licensed structural pest control operator or field representative, while waiting to take the licensing examination for up to 60 days. The California Pest Management Association is the sponsor of this bill. According to the Author, “AB 2477 provides targeted, practical relief for California’s small pest control businesses while maintaining strong consumer and safety protections. The bill addresses a gap between hiring and licensure, during which new employees—despite completing training and initiating the licensing process—are unable to fully contribute to routine operations. By establishing a narrow, one-time provisional supervision period of up to 60 days, AB 2477 allows qualified applicants who have completed at least 80 hours of supervised training, submitted to background checks, and applied for licensure to perform work under enhanced supervision, including real-time audio and video oversight. This measured approach preserves regulatory integrity while reducing unnecessary workforce bottlenecks, lowering

operational costs, and supporting the viability of small, often family-run pest control businesses across the state.”

## 2. Background.

*Structural Pest Control Board (Board)*. The Board was established in 1935 to regulate the pest control profession and ensure consumer protection in the application and operation of pest control activities. The Board issues three types of licenses for three different practice areas (branches) of pest control which include Applicator, Field Representative, and Operator. The three branches include fumigation, general pest, and termite (wood-destroying pests and organisms). Each branch covers a distinct area of pest control.

The branch types are as follows:

- Branch 1 Fumigation – The practice relating to the control of household and wood-destroying pests or organisms by fumigation with poisonous or lethal gases.
- Branch 2 General Pest – The practice relating to the control of household pests, excluding fumigation with poisonous or lethal gases.
- Branch 3 Termite – The practice relating to the control of wood-destroying pests or organisms by the use of insecticides, or structural repairs and corrections, excluding fumigation with poisonous or lethal gases.

The license types are as follows:

- Applicator - An entry-level license category issued in Branch 2 and 3 only. An Applicator is an individual licensed by the Board to apply a pesticide, or any other medium to eliminate, exterminate, control, or prevent infestations or infections. Applicators cannot inject lethal gases used in fumigation.
- Field Representative - A full journey-level license issued in all three branches. A Field Representative secures work, makes identifications, makes inspections, submits bids, and contracts for work on behalf of a registered company.
- Operator - The highest level of licensure issued in all three branches. Depending on the license category, an Operator must have at least two years, or as many as four years, qualifying experience. Only a licensed Operator may qualify a company for registration by assuming responsibility for the company and its employees as the company Qualifying Manager.

As reported in the DCA’s 2024-2025 Annual Report, the Board oversees approximately 24,000 licensees including 5,640 applicator licensees, 14,793 field representative licensees, and 3,853 operator licenses, and has slightly over 2,000 branch office registrations and company registrations. Applicators are licensed to

provide services under Branch 2 and Branch 3. Field representatives and Operator licenses are permitted to provide services in Branch 1-3 depending on education and experience requirements. The provisions of this bill are applicable only to those individuals who would apply for an applicator license.

*Structural Pest Operators and Licensees.* To obtain a field representative license for a Branch 1 application an individual must meet the following experience and examination requirements: Six months' training and experience in the practice of fumigating with poisonous or lethal gases under the immediate supervision of an individual licensed to practice fumigating. Of these six months' experience, a minimum of 100 hours of training and experience must be in the area of preparation, fumigation, ventilation, and certification and pass an examination

For a field representative license for Branch 2 application, an individual must meet minimum of 40 hours of training and experience in the practice of pesticide application, Branch 2 pest identification and biology, pesticide application equipment, and pesticide hazards and safety practice, of which 20 hours are actual field work. The minimum hour requirement must include training and experience in Integrated Pest Management and the impact of structural pest control services on water quality.

For a field representative license for Branch 3 application, an individual must meet A minimum of 100 hours of training and experience in the practice of pesticide application, Branch 3 pest identification and biology, pesticide application equipment, pesticide hazards and safety practices, structural repairs, and structural inspection procedures and report writing, of which 80 hours are actual field work. The minimum hour requirement must include training and experience in Integrated Pest Management and the impact of structural pest control services on water quality.

For an Operator Branch 1 license an individual must complete a board-approved course in the areas of pesticides, pest identification and biology, contract law, rules and regulations, business practices, and fumigation safety, and . Two years' actual experience in the practice relating to the control of household and wood-destroying pests or organisms by fumigation with poisonous or lethal gases. One year of experience must have been as a licensed field representative in Branch 1 and pass an examination.

For an Operator Branch 2 license, an applicant must meet the similar education requirements for the Branch 1 operator license, and two years' actual experience in the practice relating to the control of household pests, excluding fumigation with poisonous or lethal gases. One year of the required two years' experience must have been as a field representative in Branch 2 and pass an examination.

For an Operator Branch 3 license, an applicant must complete a board-approved course in the areas of pesticides, pest identification and biology, contract law, rules and regulations, business practices, and construction repair and preservation techniques.

*Experience.* Pursuant to current regulations, Title 16, California Code of Regulations (CCR) § 1937, experience for purposes of licensure requirements is defined to mean actual field work. In addition, a qualifying manager of a registered company or a licensed operator designated by a company is required to provide written certification of an employee's or former employee's experience and time accurately and promptly upon request of the employee.

For field representative and operator license applicants, the complete application and licensing process is as follows: Take the required educational course, dependent upon the branch an applicant will be applying for. Submit the application for the examination, which includes proof of completion of the education/experience in the examination application. Once approved to take the examination, the Board will provide the examination ID for registration purposes and a candidate handbook. Applicants schedule their own examination appointments at a PSI Test Center. Once an individual has taken and passed the examination, they then submit the licensing application to the Board.

Unlike the other two branches of pest control licensure, applicators do not need to meet education requirements or complete specific on-the-job training prior to applying for licensure. The process for an applicator license is as follows: complete an examination application with Board. Once approved to take the examination, the Board will provide the examination testing number authorization for registration purposes and a candidate handbook, and the applicant is required to schedule the examination appointment with PSI Test Center.

Once the individual passes the examination, they then apply to the Board for their license. This bill is applicable only to those persons seeking the applicator license. An applicator license is not granted unless the applicant is employed by a registered pest control company. An individual does not acquire an applicator license prior to employment.

Current law does allow an unlicensed individual who is employed by a registered pest control company to apply any pesticides in Branch 2 or 3; except, current law permits an individual under the direct supervision of a licensed field representative or operator to apply pesticides for the purposes of training for up to 90 days from the start date of their employment and the 90-day timeframe may not be extended. While many employers and prospective applicators take advantage of this 90-day period for purposes of training, it is not a requirement.

The author and sponsors note that the current licensing structure for applicator licenses is challenging from an employer standpoint, as the time from hiring the employee to actual licensing takes a significant amount of time, which likely exceeds the necessary employment training needs and standards. Although the Board processes the initial testing application around two weeks, test center schedules and Live scan results can extend the final licensure application into longer time periods, anecdotally up to two months or more. As a result, this bill seeks to create a pathway for individuals who are in the applicator licensure process to provide branch 2 and 3 services under indirect supervision, although they do not have a license. Indirect supervision, for purposes of this bill, means a

supervisor is available via audio or video communication but is not physically present at the site.

To be eligible for this, the individual must have first applied to the Board for examination eligibility and submitted the required fingerprint background check. They must also complete 80 hours of supervised training and document such training. As currently drafted, this bill does not specify what the standards should be the training. For all other applicator license applicants, they are not required to complete any training for licensure purposes, although they likely receive on-the-job training as determined through each employer. Although this bill does not specify the liability, it is likely that any disciplinary issues would fall to the licensed pest control operators or businesses who employ the unlicensed individual. This bill narrows this authorization for unlicensed applicator work to 60 days, and it is not renewable.

*Examinations.* The SPCB does not maintain reciprocal agreements with other states and therefore does not accept a national exam. The SPCB does not offer exams in language other than English because the applicant and licensee must be able to read and understand pesticide labels and comply with California labeling laws. For each license type, applicants must successfully pass written examination with a score of 70% or better. The Board develops the licensing examinations; however, the Board does not administer the examinations. Upon receiving the application for testing authorization, the Board provides the testing access number, and it is the responsibility of the licensee to schedule their own individual examination with PSI Test Centers.

During the Board's last sunset review, the question was posed to the Board about its application and licensing timelines, specifically, the Board was asked to: *Describe any increase or decrease in the board's average time to process applications, administer exams and/or issue licenses. Have pending applications grown at a rate that exceeds completed applications? If so, what has been done by the board to address them? What are the performance barriers and what improvement plans are in place? What has the board done and what is the board going to do to address any performance issues, i.e., process efficiencies, regulations, BCP, legislation?*

In Board's sunset review report 2022, the Board responded with the following: *Pending applications do not exceed completed applications. Processing times can vary based on the volume of applications at any given time, however, they remain within the SPCB's target cycle times. Processing delays are rare; however, if they occur, they are usually a result of factors beyond the SPCB's or applicant's control (i.e. response to fingerprinting submissions by the Department of Justice). Applicants are encouraged to begin the fingerprint background check as the first step in the examination/licensure process to minimize any delays. Because the SPCB's actual processing times have historically been very low, Board members have not directed the SPCB to adopt regulations for the establishment of application processing times. DCA does, however, require all programs to establish target dates for the*

*processing of applications and collects quarterly statistics on processing times.*

The author and sponsor contend that this bill is necessary to help alleviate examination and licensing delays for those individuals who seek an applicator license. The author and sponsor note that issues with scheduling the examination, application processing delays, and background check and livescan requirements can delay an applicant's time to get a license. They note that for small companies it is problematic as multiple employees must be assigned to a single job, even when the work is routine; newly hired workers cannot perform independent work while awaiting license approval; small businesses experience reduced productivity and increased labor costs. These delays can create unnecessary workforce barriers for entry-level workers while imposing disproportionate operational burdens on small pest control businesses.

3. **Arguments in Support.** The California Pest Management Association writes in support and notes, "AB 2477 provides a practical, balanced solution to a challenge facing both workers and California's licensed pest control businesses. Under the current framework, individuals entering the pest management profession can complete training and begin the licensing process, yet there is often a period where they are limited in their ability to fully participate in day-to-day operations while awaiting the completion of that process."

4. **Policy Issues for Consideration.**

*Training standards.* As drafted, this bill requires an individual who will be authorized to provide branch 2 and 3 applicator services without the required license if they first have acquired 80 hours of documented in-person training under the direct supervision of a licensed operator or field representative. However, this bill currently lacks any specificity regarding what should be included in those 80 hours of training. *Given that unlicensed applicators will be eligible to provide services without on-site direct supervision, moving forward, the bill should provide greater specificity on what standards should be included in this pathway to licensure.*

*What is the Board's Oversight of Unlicensed Trainees?* Although this bill is not establishing a new license, it will require the Board to be responsible for additional workload. This bill requires that individuals eligible to work under the provisions of this bill meet certain standards: including training, live scan and examination authorization, but there is not a process for the Board to approve, verify or have any knowledge of those authorized to provide unlicensed services pursuant to the provisions of this bill. *Moving forward, the bill should clarify authority for the Board in this space and ensure the Board has the appropriate statutory provisions in place to promulgate necessary regulations.*

*Crossover with the Current Training Authorization.* Under current law, an unlicensed individual employed by a registered company, is prohibited from applying pesticides included in Branch 2 or Branch 3 except the unlicensed person is permitted for 90 days from the date of employment, apply pesticides under direct supervision for training purposes. The difference between the current 90-day training period in current law, and the provision of this bill is that the unlicensed person as proposed

in this bill must first obtain 80 hours of training, pass a background check by the Board, and have completed an application for education-and the unlicensed person may provide services without direct supervision. *As currently drafted, this bill tries to ensure that the current unlicensed 90-day training and the unlicensed applicator practice authorized by this bill do not conflict, but as currently drafted, this bill may be confusing for employers and future applicants. Moving forward, unnecessary code references should be removed.*

*Joint Sunset Review Oversight.* The Board is subject to the Committee's comprehensive sunset review oversight process. The sunset review oversight process provides an opportunity for the Department of Consumer Affairs, the Legislature, the boards, interested parties and stakeholders to discuss the performance of the boards and make recommendations for improvements. The sunset date for each board allows enough time for the board to be reviewed by the Committees and for legislation to be passed to extend the sunset date of the board when appropriate, as well as simultaneously make appropriate policy changes to board operations and regulation of the profession.

The Board is scheduled for the sunset review oversight next year, given that the Board is scheduled to sunset on January 1, 2028, if legislation is not introduced to extend the operations of the Board. Next year, the Board will submit its required sunset review report to the appropriate legislative policy committees, where operations of the Board will be reviewed, including licensing processing and licensure requirements among other issues. Sunset review is the appropriate time to review and discuss any challenges with licensing and review whether the current requirements for licensure are appropriate and necessary.

#### **SUPPORT AND OPPOSITION:**

##### Support:

California Pest Management Association

##### Opposition:

None received

**-- END --**