

CPME 730

**PROCEDURES FOR APPROVAL OF CONTINUING
EDUCATION PROVIDERS ~~OF PROVIDERS OF~~
~~CONTINUING EDUCATION~~ IN PODIATRIC MEDICINE**

Council on Podiatric Medical Education

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Council on Podiatric Medical Education

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INTRODUCTION

The Council on Podiatric Medical Education (CPME) is an autonomous, professional accrediting agency designated by the American Podiatric Medical Association (APMA) to serve as the accrediting agency in the profession of podiatric medicine. The Council evaluates, accredits, and approves institutions and programs. The scope of the Council's approval activities extends to institutions throughout the [jurisdiction of the](#) United States and ~~its territories and~~ Canada.

The mission of the Council is to promote the quality of graduate education, postgraduate education, certification, and continuing education. By confirming these [p](#)Providers meet established standards and requirements, the Council serves to protect the public, podiatric medical students, [residents, fellows,](#) and doctors of podiatric medicine.

The Council was established by the APMA House of Delegates in 1918 and charged with formulating educational standards. ~~The Council began accrediting colleges of podiatric medicine in 1922. The Council conducted its first residency evaluation in 1964.~~ The Council has been responsible for approval of [Continuing Education](#) [p](#)Providers ~~of continuing education~~ in podiatric medicine since 1977.

The Council approves ~~providers of e~~Continuing ~~e~~Education [Providers](#) that demonstrate and maintain compliance with the standards and requirements stated in CPME 720, *Standards and Requirements for Approval of [Continuing Education](#) Providers of [Continuing Education](#) in Podiatric Medicine*. The Council and its Continuing Education Committee (CEC) base approval on programmatic evaluation and periodic review. The Council approves the [p](#)Provider itself rather than ~~each of the~~ [p](#)Provider's continuing education activities but reserves the right to review any or all of a [p](#)Provider's activities, educational or otherwise. [The Council recognizes that institutions, organizations, or individuals seeking approval do so voluntarily. The burden of demonstrating compliance with Council standards and requirements is the responsibility of the Continuing Education Provider.](#)

"Approval" is defined as the recognition accorded a ~~e~~Continuing ~~e~~Education [p](#)Provider that has demonstrated compliance with standards and requirements established by the Council. The approval process for ~~providers of e~~Continuing ~~e~~Education [Providers](#) in podiatric medicine ~~involves is essentially a six-step process, involving:~~ (1) development and submission of [an](#) application or petition materials documenting the ability to comply with the Council's standards and requirements; (2) review of the application or petition by CEC; (3) forwarding of an approval recommendation from CEC to the Council; (4) determination by the Council of initial or continued approval; (5) procedural reconsideration, reconsideration, and appeal of a proposed adverse approval action; and (6) annual follow-up of progress in improving the quality of the activities provided.

The Council reserves the right at any time to conduct on-site, [virtual, and reverse](#) evaluations of activities offered by applicant and approved [p](#)Providers, to evaluate ~~instructional media educational activities~~ developed by applicant and approved [p](#)Providers, ~~and to schedule reverse site visits.~~ Providers must review CPME 720 prior to applying for approval or submitting petitions. Particular attention should be paid to the sections entitled "About this Document" and "Information for Providers."

For a pProvider to be eligible for Council approval the primary administrative office of the pProvider must be located within the jurisdiction of the United States or Canada and the preponderance of the pProvider's activities must be offered within the jurisdiction of the United States and/or Canada. The following approval procedures have been developed to assist potential and approved pProviders in preparing for initial or continuing approval and to guide CEC and the Council in their deliberations concerning the approval of eContinuing eEducation pProviders. Prior to adoption, all Council policies, procedures, standards, and requirements are disseminated widely in order to obtain information regarding how the Council's community of interest may be affected.

COMMUNICATION BETWEEN CEC/COUNCIL AND ~~THE~~ PROVIDER

The CEC and ~~the~~ Council have adopted the following general policies related to communication with ~~providers of e~~Continuing eEducation Providers. Information related to specific correspondence (e.g., notification of approval actions) appears in the pertinent sections of this document. All correspondence and inquiries must be directed to the Council office.

The CEC and ~~the~~ Council require that the pProvider's director of continuing education is the individual responsible for submitting the submission of all materials to Council staff related to applications, petitions, annual reports, and reconsiderations and for communication with the Council related to the application and approval processes. All materials submitted by the pProvider must be submitted on media in a form or format as determined by Council, as determined by the Council or its committees, accompanied by a cover letter signed by the director. Signatures may be electronic or handwritten. The CEC, ~~the~~ Council, and evaluators will not consider unsigned or stamped signature ~~stamped~~ correspondence or materials. Materials submitted by fax or electronically will be accepted as long as they follow these guidelines. Unsigned or signature stamped correspondence or materials will not be considered. Submission of such materials may adversely affect the approval status of the provider.

All correspondence and inquiries should be directed to the Council office. Utilization of other channels of communication may delay the processing of applications and result in inconvenience to applicant and approved providers.

The CEC and ~~the~~ Council mail correspondence to the director of continuing education at the director's office email and/or physical address indicated on the pProvider's application, progress report, or most recent annual report. The pProvider's chief administrative officer is copied on all correspondence.

The pProvider is responsible for informing the Council office in writing within 30 calendar days of substantive changes in the program. The pProvider must inform the Council of changes in areas including, but not limited to, appointment of a new director of continuing education, joint providership, and significant changes in curricular structure educational activities and administrative structure. Notice of appointment of a new director or new chief administrative officer must be submitted by an appropriate member of the pProvider's administrative staff.

The Council's continuing education documents and any proposed revisions to the documents are available on at the Council's website, <https://www.cpme.org>.

CONTINUING EDUCATION COMMITTEE

~~The~~ CEC is responsible for reviewing applications, petitions for continued approval, ~~reports of on-site evaluations~~ evaluation reports, progress reports, ~~requests for reconsideration~~, and other information submitted by the Providers ~~annual reports when concerns have been identified through staff review~~. CEC may modify its own policies and/or recommend to the appropriate ad hoc committee modifications in standards, requirements, and procedures for pProvider approval.

The Council determines the Provider's approval status.

Composition of the CEC includes three representatives from approved providers of continuing education in podiatric medicine (selected by the Council), two representatives from the podiatric practice community (selected by the Council), one representative from ~~state licensing boards~~ state boards for examination and licensure (the Council may request that the Federation of Podiatric Medical Boards recommend a potential representative), ~~at least two Council members (one of whom is a public member), and one representative of the American Society of Podiatric Executives (selected by this organization).~~ one representative from the American Society of Podiatric Executives (ASPE) and at least two Council members (one of whom should be a public member). ASPE shall be requested to provide a list of names from which the Council chair shall select an appointee for the Committee. The members of the Committee are appointed by the Council chair and confirmed by the Council. The Council and its staff administer the affairs of CEC.

APPLICATION FOR APPROVAL OF A NEW CONTINUING EDUCATION PROVIDER

Submission of the Application

~~Providers seeking initial approval must follow the procedures stated in this section.~~ The Council encourages potential pproviders to contact Council staff early in the developmental stages of the program of continuing education should questions arise related to the Council's standards, requirements, and procedures for approval. The Council does not accept applications directly from potential pProviders. It must be first received by the CEC.

An institution, organization, or individual seeking initial approval must ~~complete and submit~~ submit a completed CPME 715, *Application for Approval of a Continuing Education Provider of Continuing Education in Podiatric Medicine*, accompanied by ~~specified supplementary information~~ all required materials and the non-refundable application fee, to the Council office. The ~~supplementary documentation requirements~~ required materials are outlined on the application form. ~~A provider may apply for approval based on joint providership (including activities and/or instructional media developed by the joint providers).~~

~~The Council recognizes that institutions, organizations, or individual s seeking approval do so voluntarily. Therefore, the burden of proof regarding compliance with Council standards and requirements is the responsibility of the potential provider.~~

Council staff reviews the application to determine the completeness of information submitted. The pProvider is informed whether the application appears to be complete. If the application is considered to be incomplete, the director of continuing education is notified in a timely manner with the request to submit the missing required information. If the completed application, required

~~supplementary documentation, materials, and non-refundable application fee are in order, received 60 days prior to the next scheduled CEC meeting, -the prospective pP~~Provider's application ~~is will be~~ placed on the agenda ~~of the next CEC meeting.~~ The entire review process for a Provider requesting approval may require a period of four to six months from the time the application is reviewed by the CEC until an approval action is taken by the Council. Approval of a ~~provider of e~~Continuing ~~e~~Education Provider is effective on the date on which the Council takes the approval action.

~~Complete applications will be considered at the next regularly scheduled CEC meeting. The entire review process for a provider requesting approval may require a period of 4–6 months from the time an application is received by Council staff until an approval action is taken.~~

~~All applications must be reviewed by CEC. The Council does not accept applications directly from potential providers. CEC and the Council will not consider incomplete applications.~~

~~Approval of a provider of continuing education is effective on the date on which the Council takes the approval action.~~

Withdrawal or Termination of the Application

A pPProvider submitting an application for approval may withdraw its application without prejudice at any time before the Council takes an action on the application.

If the pPProvider fails to respond ~~in writing~~ within six months to ~~written~~ requests from Council staff and/or CEC in a form and format as specified by Council staff for information to complete the application, the application will be terminated by Council staff. Council staff will correspond with the director of continuing education and the pPProvider's chief administrative officer to inform them the application has been terminated. The pPProvider may submit a new application, supplemental required material, and non-refundable application fee after the application has been terminated.

Review by the Committee and Council

Following review of a prospective pPProvider's application, CEC has the following recommendation options: (1) approve the pPProvider, with or without a request for additional information (progress report), (2) withhold approval, or (3) table the decision and request additional information.

CEC and the Council reserve the right to conduct an on-site on-site, virtual, and reverse evaluation of any continuing education activity ~~or to schedule a reverse site or virtual visit~~ with the pPProvider bearing full responsibility for expenses ~~involved incurred.~~ The CEC and ~~the~~ Council ~~also~~ reserve the right to survey participants or to collect supportive data information through any reasonable means considered necessary to facilitate an approval action. The pPProvider may request, at its own expense, an appearance before CEC to submit additional information about its application and/or continuing education activities. CEC and the Council reserve the right to reject applications from and to deny approval as a pPProvider to applicants that promote or provide clinical course work or learning experiences that do not have a sound scientific basis, proven efficacy, or ensure public safety.

~~An applicant should be aware it may be difficult to demonstrate the ability to comply with standards and requirements until after at least one continuing education activity has been completed. If the provider wishes to proceed with the application process during its first activity, CEC and the Council will honor the provider's request. To complete the process of committee review and Council approval, the provider must submit documentation of subsequent evaluation of the activity and its use in planning future activities before the Council will consider the approval status of the provider. The Council advises prospective Providers to at least be in the process of planning an activity prior to applying for approval. Activities that occur prior to the Council granting approval must not allow learners to earn Continuing Education Contact Hours.~~

PETITION FOR CONTINUED APPROVAL FOR APPROVED PROVIDERS

An approved ~~p~~Provider seeking continued approval as a ~~provider of e~~Continuing ~~e~~Education ~~Provider~~ in podiatric medicine must submit CPME 735, *Petition for Continued Approval*, accompanied by ~~specified supplementary information required materials~~, and the petition fee to the Council ~~office~~. The required ~~supplementary documentation is materials are~~ outlined on the petition form and the amount of the petition fee is invoiced. The petition materials are to present detailed information related to the ~~p~~Provider's continuing education activities, allowing the ~~p~~Provider to document continued compliance with the Council's standards and requirements for approval, as well as improvements in any previously identified areas of concern.

~~Approximately six months prior to the next scheduled CEC meeting, Council staff contacts the director of continuing education to confirm the petition due date. The Council and CEC expect the pProvider's director of continuing education is the individual responsible for submission of the petition and communication with Council staff related to the petition. Providers are reminded in approval letters as to when their next petition is due. CPME Sstaff will review each timely petition and may request additional information as needed when the petition is received by the deadline. IfOnce the petition and required materials supplementary documentation are in ordercomplete and received by the deadlinedue date, the pProvider's petition is placed on the CEC agenda of CEC's next meeting. Council staff will inform a pProvider whose materials are grossly incomplete that an appropriately completed petition must be submitted immediately for consideration at the CEC meeting for which the petition was requested. Failure of an approved pProvider to submit a completed petition shall be cause for the Council to place the Provider on extendprobation, which may lead to withdrawal of approval.~~

Review by the Committee and Council

Following review of a petition, CEC has the following recommendation options: (1) approve the ~~p~~Provider, with or without a request for additional information (progress report), (2) extend probationary approval, (3) withdraw approval, for a ~~p~~Provider already on probation, and (4) table a decision and request additional information from the ~~p~~Provider.

~~The CEC and the Council reserve the right to conduct an on-site on-site, virtual, and reverse evaluation of any continuing education activity, and to evaluate any on-demand activities/instructional media educational activities, or to schedule a virtual or reverse site visit with the pProvider bearing full responsibility for expenses incurredinvolved. CEC and the Council also reserve the right to survey participants or to collect supportive data information through any reasonable means considered necessary to facilitate an approval action. The pProvider may~~

request, at its own expense, an appearance before the CEC to present additional information about its petition and/or continuing education activities.

~~The Council recognizes providers submitting petitions for continued approval do so voluntarily. Therefore, the burden of proof is the responsibility of the provider; including demonstrating activities are educational in nature.~~

ON-SITE EVALUATION ON-SITE, VIRTUAL, AND REVERSE SITE VISITSEVALUATIONS

~~The CEC and the Council, at their discretion, will~~may conduct an evaluation of the provider ~~whenever circumstances require such review~~. Circumstances that might warrant ~~scheduling of~~ an evaluation include, but are not limited to, the following:

- The ~~provider of e~~Continuing ~~e~~Education Provider has undergone a substantial change.
- Major deterioration ~~in~~of the program of continuing education ~~has occurred~~.
- The ~~p~~Provider has requested reconsideration of a proposed adverse approval action.
- ~~A formal complaint against an approved p~~Provider ~~requires evaluation of the issues related to the complaint~~.
- A Provider applying for provisional approval
- A Provider with probationary approval

~~In any event, CEC and the Council reserve the right to conduct an evaluation of the p~~Provider, ~~whenever circumstances require such review~~. The primary purpose of ~~either an on-site or reverse-site visit~~ an evaluation is to ~~document and assess~~ review the capacity of the ~~p~~Providers' to ~~conduct~~ continuing education activities, ~~for the podiatric medical profession. The evaluation assesses the following: The evaluation may have an impact on the Provider's approval status.~~

Evaluation Guide

The Council has developed and makes available CPME 705, *Evaluation Guide*. This publication is available on the Council's website or may be obtained by contacting the Council office.

~~The general quality of the program of continuing education~~

~~The provider's ability to carry out its mission and the learning objectives established for its individual activities~~

~~The provider's plans for continued improvement~~

~~The evaluation may have an impact on the provider's approval status. The extension of continued Council approval is contingent upon the findings of the evaluation. An on-site evaluation is usually scheduled to coincide with the date of an activity.~~

Appointment of Evaluator(s) and Preparation for Evaluation

The Council chair appoints the evaluator(s) based upon a recommendation from the CEC chair and Council staff. The evaluator is selected from a pool of professionals who have expertise in ~~adult and~~ continuing education, ~~and/or continuing education in podiatric medicine. The pool will be constituted through recommendations from Council members, Council staff, and/or the~~

~~community of interest. Evaluators may include, but are not limited to, current and former members of the Council and CEC. Ordinarily, i~~Individuals who are selected to represent the Council as evaluators will have participated in a training session for evaluators. Should an evaluation team be appointed, one evaluator will serve as chair and be responsible for preparing and submitting the report of the evaluation.

The evaluators do not act as consultants to the pProvider. The evaluators' role ~~is~~are that of fact-finder and observer to present ~~their findings to the~~ CEC ~~an assessment~~ of the pProvider's ~~potential non~~compliance with the Council's standards and requirements.

~~Approximately At least 4560~~ calendar days before the evaluation, Council staff formally informs the pProvider of the name of the evaluator(s) and the time, date, and location of the evaluation. The pProvider has the prerogative of rejecting an evaluator when an appropriate cause related to conflict of interest can be clearly identified. In such a case, a written statement from the pProvider is to be submitted to the Council office ~~within 10 calendar days of receipt of the notice of evaluators. no later than 30 days before the date of the evaluation, affording the Council sufficient opportunity to appoint a replacement evaluator(s).~~ The Council will not appoint evaluators who have any known conflict of interest in the evaluation of the pProvider, including graduates, current and former faculty members, administrators, or officers of the pProvider.

~~Preparation for and Conduct of Evaluation~~

~~The evaluator(s) determine(s) the date of the on-site evaluation in conjunction with the director of continuing education. A copy of CPME 705, Agenda Guide, is forwarded to the director of continuing education. Using the agenda guide, the director of continuing education is required to prepare a schedule identifying personnel to be interviewed by the evaluator. Depending upon the reasons for which the evaluation is to be conducted, the director of continuing education may be advised by Council staff and/or the evaluator of interviews and activities that need not be scheduled. The agenda must be forwarded to the Council office at least three weeks prior to the evaluation.~~

~~In order that the evaluator may assess the administrative structure of the provider and curriculum content of the program of continuing education, the agenda for the on-site evaluation requires that key participants in the program of continuing education be interviewed, as indicated in CPME 705. The evaluator conducts interviews with the director of continuing education, chief administrative officer, members of the advisory/education committee, and staff members involved in planning continuing education activities. The director of continuing education and other representatives of the provider should be prepared to clarify and amplify data in the application or petition materials and demonstrate the effectiveness of the provider's continuing education activities. If the activity is offered under joint providership, an administrative representative of the primary approved provider must be available for interview by the evaluator.~~

On-site evaluation of an activity includes observation of a learning activity in session and review of facilities and resources. Evaluation of instructional media includes participation of the evaluator in the continuing education activity. ~~The evaluation concludes with an exit interview that includes the director of continuing education and the chief administrative officer to discuss the tentative findings. During the exit interview, the evaluator explains to the representatives of the provider that the Council's procedures for approval of providers of continuing education in~~

~~podiatric medicine (specifically, the sequence of events that will follow the evaluation).~~

~~Failure of key participants in the program of continuing education to be available will be cause for cancellation of the evaluation, which may jeopardize the approval status of the provider.~~

~~Rescheduling of the evaluation may be possible but only at the expense of the provider.~~

Preparation of the Report

The evaluation ~~team~~ prepares a draft report based on observations ~~and impressions~~ from the ~~on-site~~ evaluation. The ~~team chair/evaluator~~ forwards this draft report to the Council ~~staff office~~ for ~~proofreading and formatting for editing~~. The ~~edited~~ draft of the report is then returned to each evaluator for review and comments. A draft copy of the report, consisting of a summary of findings, ~~a list of interviewees~~, areas of potential noncompliance, ~~and~~ recommendations ~~and commendations~~ is forwarded to the director of continuing education and the chief administrative officer of the provider.

The ~~p~~Provider is ~~encouraged to offered~~ 30 calendar days to submit a substantive response to areas of potential noncompliance ~~and recommendations~~ identified ~~by in~~ the ~~report/evaluator~~, as well as any supporting documentation, prior to consideration of the report by CEC. The cover letter to the ~~p~~Provider specifies the deadline for receipt of the response. The ~~p~~Provider may ~~offer corrections of errors as they relate to names, positions, data, and other documentable facts~~ ~~correct factual information included~~ in the report; however, ~~impressions and observations findings~~ based on the on-site visit will not be modified.

Reverse Site Visit/Evaluation

CEC and/or the Council have the prerogative of scheduling a reverse site ~~visit/evaluation~~ rather than an on-site ~~or virtual~~ evaluation of a ~~p~~Provider. In a reverse site ~~visit/evaluation~~, a representative(s) of the ~~p~~Provider attends a CEC meeting ~~virtually or in person at the discretion of the Council, at the Provider's expense~~, to present information and appropriate documentation about the ~~p~~Provider relative to specific concerns of CEC and/or the Council.

Once the CEC and Council have made a determination that a reverse site evaluation must occur, the provider will be informed of the specific concerns needing to be addressed. The Provider is expected to address all concerns and provide any additional supporting documents related to the concerns on the day of the reverse site ~~visit/evaluation~~.

Virtual Site Evaluation

This may include a visualization of a live activity that is occurring, the attendance of a virtual activity, and/or a web interviews.

CONSIDERATION BY CEC AND THE COUNCIL CEC REVIEW

CEC meets prior to each of the ~~semi-annual/regular~~ meetings of the Council ~~and submits their~~. ~~Approval~~ ~~action~~ ~~recommendations to the Council~~ ~~are determined by CEC, only at meetings of CEC,~~ ~~or by virtual meeting/conference call, and e ballot.~~ (see Categories of Approval and Approval Period).

~~CEC reviews applications, petitions, reports of on-site evaluations, progress reports, requests for reconsideration, and annual reports when concerns have been identified through staff review other request. The CEC reviews other topics on its agenda based on timely issues or concerns.~~

For each proposed approval action to the Council, the CEC recommendation may includes the approval status, date by which the next petition is due, must be submitted, period of approval, identification of areas of noncompliance with Council standards and requirements, identification of areas that merit commendation, and a schedule for requesting progress reports. The recommendations from the CEC to the Council are confidential.

During discussions about the approval status of ~~providers of e~~Continuing ~~e~~Education Providers, CEC members affiliated with the ~~p~~Provider under consideration in a governance, administrative, staff, or faculty capacity or in any other financial or personal capacity must recuse themselves from the deliberations. CEC members who served on the most recent ~~on-site~~ evaluation team are required to recuse themselves from discussion and voting until the Council has determined a final approval action.

In reviewing a progress report, CEC has the prerogative to add, modify, or delete areas of potential noncompliance or to recommend the Council add, modify, or delete areas of potential noncompliance.

Council Action

At a meeting of the Council, the CEC chair presents ~~for each provider~~ the confidential recommendation(s) of the CEC. Areas of noncompliance determined by the Council may include, but are not limited to, those ~~indicated-identified~~ by an evaluation team and CEC. The ~~p~~Provider ~~may will~~ be ~~requested-required~~ to submit documentation of progress made in addressing areas of noncompliance and/or concerns expressed by CEC or the Council.

Approval actions are taken by the Council at official meetings. Under special circumstances, e-ballots or video/conference calls may be used. ~~for provider approval decisions.~~

During discussions about the approval status of the ~~p~~Provider, Council members affiliated with the provider under consideration in a governance, administrative, staff, or faculty capacity or in any other financial or personal capacity must ~~excuse-recuse~~ themselves from the deliberations. Council members who served on the most recent ~~on-site~~ evaluation ~~of educational activities or evaluation of an on-demand/ instructional media activity~~ are required to ~~excuse/recuse~~ themselves from discussion and voting until the final approval action has been determined.

THIRD PARTY COMMENT

The Council provides opportunity for individuals or organizations to submit written comments concerning a Provider's qualifications for approval. The Council publishes notices regarding its plans to review petitions for continued approval and conduct an evaluation of a Provider on the Council's website. The notice indicates the deadline for receipt of third-party comments.

Third-party comments must be signed relate to the provider, and be received no later than 60 days prior to the continuing education committee's next meeting. Comments will be forwarded to the CEC for review and appropriate action.

CATEGORIES OF APPROVAL ~~AND APPROVAL PERIOD~~

The following approval actions are available to the Council:

- For ~~new providers completing an application~~, the Council grants ~~provisional approval or withholds approval~~.
- For ~~existing approved providers completing a petition or submitting a progress report~~, the Council extends approval (with or without further progress reports), extends probation, or withdraws approval (the option of withdrawal of approval applies only to a provider already on probation).

The Council has established the following categories of approval:

Provisional Approval

Provisional approval indicates substantial compliance with the CPME 720, *Standards and Requirements for Approval of Continuing Education Providers in Podiatric Medicine*. Provisional approval is effective on the date the action is taken by the Council. Approval is not granted retroactively nor prior to the date on which the Council takes action.

Continued provisional approval is contingent upon submission of a progress report by the date specified in the approval letter. The progress report(s) is to demonstrate correction of specific areas of noncompliance in meeting one or more requirements and/or to any **other concerns** identified by the CEC and/or the Council.

The Provider's petition is due no later than three years from the time of the Council action. The approval letter includes the date by which the first scheduled petition is due.

A Provider granted provisional approval may not extend joint providership.

Approval

Approval indicates full compliance ~~recognition that a provider is in full compliance~~ with the Council's standards and requirements for approval. In granting an extended period of approval, the Council expresses its confidence in the abilities of the pProvider to continue providing adequate support and implementing ongoing improvements in the continuing education program.

~~As a condition of continued approval, the provider may be requested to submit a progress report relating to educational or administrative enhancement as based upon recommendations made by CEC and/or the Council. Alternatively, a progress report will be requested related to correction of specific areas of none compliance.~~

The pProvider is granted an initial term of approval effective at the time of the Council action. ~~Under no circumstances is approval granted retroactively or prior to the date on which the Council takes action. The approval letter includes the effective date of approval and the submission date of the next scheduled petition for continued approval. length of approval is clearly stated in the approval letter transmitting the Council's action to the provider. Approval may be contingent on~~

~~the submission of one or more progress reports at specified intervals, as indicated in the approval letter. The approval letter also includes the date by which the scheduled petition for continued approval must be submitted. The provider's initial petition is due no later than three years from the time of the Council action. For each subsequent terms of approval, Subsequent the petitions isare due no later than every five years, from the time of the Council action. The period of approval for approved providers extends from the effective date of approval until the Council acts upon the provider's petition for continued approval. CEC and/or the Council may request additional information or submission of the petition at an earlier date, should significant concerns become evident. from review of the provider's progress report(s) and/or annual report(s). CEC/Council reserves the right to extend the submission date of the petition.~~

~~Approval of a provider does not imply approval of the provider's satellite organizations or divisions, such as regional or local chapters of a national organization. Approval of a Provider does not imply approval of the Provider's auxiliary organizations or divisions, such as regional or local chapters of a national organization.~~

Approval with Report

Approval with report indicates a Provider is in substantial compliance with the CPME 720, Standards and Requirements for Approval of Continuing Education Providers in Podiatric Medicine, however one or more areas of noncompliance have been identified.

The progress report(s) must demonstrate correction of specific areas of noncompliance in identified by the CEC and/or the Council and must be submitted by the date specified in the approval letter. Failure to meet the standards and requirements as stated by the Council may result in probation.

Probation

Probation indicates a provider ~~has not demonstrated is in non~~ compliance with the Council's CPME 720, standards and requirements for approval Standards and Requirements for Approval of Continuing Education Providers in Podiatric Medicine to the extent that the quality and effectiveness of the continuing education program are in jeopardy. This category serves as a strong warning to the ~~p~~Provider that serious problems exist that could cause its educational program to fail to meet its stated mission. ~~When probation is extended, t~~The ~~p~~Provider is considered to be a candidate for withdrawal of approval when placed on probation.

Providers with probationary approval may not enter into any type of joint providership agreements. Providers on probation may fulfill previously executed joint providership agreements. The Provider is required to submit to the CEC and Council all executed joint provider agreements.

The Provider must demonstrate significant progress in the correction of areas of noncompliance within a specified period, as determined by the CEC/Council. The Council may then grant a change in approval status. This period of probation is to be determined by the Council but is usually limited to a maximum of two years. Failure to meet the standards and requirements as stated by the Council during the two-year period, including any extension for good cause, will result in withdrawal of approval.

A decision to extend probation is not subject to the Council's procedures for procedural reconsideration, reconsideration, or appeal.

~~The provider must demonstrate submit evidence of significant progress in correcting areas of noncompliance, within a specified period. The Council may then grant a change in approval status. Probation may not extend for more than two years unless the committee determines an extension of the probationary period is necessary due to demonstration of progress on a plan whose fulfillment would require an extension in time. This category applies only to previously approved providers and is a published approval status. A decision to extend probation is not subject to the Council's procedures for procedural reconsideration, reconsideration, or appeal.~~

~~Providers approved on a probationary status may not extend joint provider approval to another entity or organization. Providers approved on a probationary status may, however, extend joint status for activities contracted prior to institution of probationary status.~~

Withholding of Provisional Approval

~~Withholding of provisional approval occurs when the application from a new Provider fails to demonstrate is determined in the event a new provider seeking approval evidences substantial noncompliance with the Council's CPME 720, Standards and Requirements for Approval of Continuing Education Providers in Podiatric Medicine standards and requirements for approval. When the Council proposes withholding approval of a potential provider, factors having significant impact on the effectiveness of the educational program are identified as the basis for the action. A decision to withhold approval will not become final or be published until the processes of procedural reconsideration, reconsideration, and appeals are exhausted (see Procedural Reconsideration, Reconsideration, and Appeal).~~

Withdrawal of Approval

Withdrawal of approval is determined under any one of the following conditions:

- A pProvider on probation has failed to correct one or more areas of noncompliance, or a new area(s) of noncompliance has emerged, and therefore the pProvider fails to demonstrate evidences substantial noncompliance with the Council's CPME 720, Standards and Requirements for Approval of Continuing Education Providers in Podiatric Medicine standards and requirements.
- A pProvider withdraws voluntarily from offering continuing education activities. Actions to withdraw approval voluntarily are not subject to the Council's procedures for procedural reconsideration, reconsideration, and appeal.
- Two or more providers merge into a single new provider, resulting in the loss of identity of a previously approved provider.
- A pProvider has remained inactive by not conducting an educational activity for three consecutive years immediately following completion of the last educational

~~activity. for a period of more than two consecutive years (see [Inactive Status](#)).~~

~~When the Council considers an action to withdraw approval, factors having significant impact on the effectiveness of the provider are identified as the basis for the action. A decision to withdraw approval will not become final or be published until the processes of procedural reconsideration, reconsideration, and appeal are exhausted. Reconsideration and appeal are available only to pProviders on probation failing to correct areas of noncompliance (see [Procedural Reconsideration, Reconsideration, and Appeal](#)).~~

NOTIFICATION OF ACTION

~~Within a reasonable period fFollowing each of action by the Council,'s semi-annual meetings, an approval letter indicating the Council action is forwarded to each pProvider currently under consideration. Confidential correspondence regarding Council actions is addressed to the director of continuing education and the chief administrative officer. A copy of the letter is forwarded to tThe chief administrative officer of the provider is copied on all correspondence.~~

~~When the Council acts ~~ion is either~~ to pPlace the provider on probation, ~~to~~ continue probation, ~~to~~ withhold approval, or ~~to~~ withdraw approval, the letter is sent by email and with a trackable delivery service to the director of continuing education and the chief administrative officer. ~~letter to the director is sent by certified mail, with a return receipt requested. Letters to withhold approval or to withdraw approval are forwarded sent to the director~~ within 30 calendar days of the Council action.~~

~~EachThe notification letter indicates the approval categorystatus of the pProvider. Letters to Providers who have been granted provisional approval, approval, approval with report, and probation will include ~~and~~ the due date of the next petition,; ~~unless the action is to withhold or withdraw approval.~~ When the CEC and Council ~~takes an action and require~~ requests submission of a progress report, the letter identifies the reason(s) for taking the action, the required supplementary documentation, and the due date. ~~The letter outlinesstates the necessary information required supplementary documentation and the due date. that must be submitted for CEC and the Council to review the approval status of the provider at future scheduled meetings, as well as the date on which this information is due in the Council office.~~~~

~~Letters to Providers, when the action is to~~ When the Council considers withholding or withdrawing approval, the letter will specify the reason for the action, the date of the action, the process for procedural reconsideration, reconsideration, appeal, and the date by which such a request must be received by the Council. ~~advising the provider of the proposed action contains: the specific reason(s) for taking the proposed action, the date the action becomes effective unless a request for procedural reconsideration or reconsideration is received from the provider, and the right of the provider to request procedural reconsideration, reconsideration, and appeal and the date by which such a request must be received by the Council.~~

~~When the approval action is based on the report of an on-site evaluation, a final copy of the report is enclosed with the approval letter. The report reflects the provider's educational program, as it existed at the time of the on-site evaluation. The final report does not, therefore, reflect program modifications made subsequent to the on-site evaluation that may have been described in the provider's response to the draft report.~~

~~The Council awards a certificate to approved providers.~~

The Council awards a certificate to institutions sponsoring programs recognized in the categories of provisional approval, approval, and approval with report.

PROCEDURAL RECONSIDERATION, RECONSIDERATION, AND APPEAL

The following reconsideration and appeal procedures are available if the Council proposes withholding or withdrawing approval:

- **Procedural reconsideration, followed by reconsideration, followed by appeal, or**
- **Reconsideration, followed by appeal**

A request to initiate the processes of procedural reconsideration, reconsideration, or appeal will be accepted for cause, ~~and A request~~ will not be accepted ~~solely on the basis of~~ based on dissatisfaction with the proposed adverse action; nor will it be accepted on the basis of ~~for~~ modifications made subsequent to the determination of the adverse action.

~~A provider that conforms to Council standards, requirements, and/or procedures following determination of an adverse action (resulting in withholding of approval or withdrawal of approval) will be viewed as a new provider and will be required to follow the application procedures described earlier in this publication.~~

~~The provider receives formal written notification of~~ The letter of the adverse action shall include following the action of the Council. ~~The~~ the basis for the adverse action and the pProvider's right to request procedural reconsideration, reconsideration, and appeal are stated clearly in the notification letter.

When the Council considers an adverse action, the action does not become final, nor is it published, until the pProvider has been afforded an opportunity to complete the processes related to procedural reconsideration, reconsideration, and/or appeal. If the pProvider does not initiate the procedural reconsideration, reconsideration, or appeal processes, then the pProvider's rights to due process through the Council are ~~viewed to be~~ exhausted.

During this due process period, the approval status of the pProvider reverts to the status prior to the adverse action. If the Council sustains an action to withdraw approval, the final action becomes effective as determined by the Council but will not be fewer than 60 calendar days and not more than one year following the date of the initial adverse action of the Council.

Procedural Reconsideration

Procedural reconsideration is the process allowing the pProvider opportunity to request that the Council review the proposed adverse action for the purpose of determining whether the Council or CEC failed to follow Council procedures described in this publication. Because procedural reconsideration is designed for the review of errors in the application of Council procedures, matters of disagreement related to issues of substance will not be reviewed within the procedural reconsideration process. Such matters, however, may be identified as the basis for a request for reconsideration and/or appeal.

A request for procedural reconsideration must be submitted within ~~15~~30 calendar days following receipt of the ~~notification~~ letter. If such a request is not submitted and postmarked or date-stamped within this ~~15~~30 day period, then the Council considers the provider to have waived all rights to procedural reconsideration. The ~~p~~Provider ~~is encouraged to~~ must submit its written request to the Council ~~office~~ by a trackable delivery service to the address on the letter received. ~~certified mail, with a return receipt requested.~~

The request for procedural reconsideration must identify the procedure(s) in question and describe in detail the ~~p~~Provider's claim that the procedure(s) was not followed, including any documentary evidence to support the claim. Following receipt by Council staff, the Council's Executive Committee considers the request for procedural reconsideration by virtual meeting/conference call or actual meeting. The Council acknowledges in writing the receipt of all procedural reconsideration materials.

Based on a recommendation of the Executive Committee, a decision may be made by the Council either by virtual meeting/conference call or meeting to:

- sustain the previous action
- rescind the previous action and refer the matter for additional review by CEC; or
- defer action and conduct an on-site evaluation

~~If an evaluation is conducted during procedural reconsideration, the provider and the Council share the cost of the evaluation equally.~~ The director of continuing education and the chief administrative officer are notified of the action taken with respect to the procedural reconsideration no later than 30 calendar days following the next scheduled meeting of the Council following the original determination of the action that led to the request for procedural reconsideration.

Reconsideration

Reconsideration is the process allowing the ~~p~~Provider opportunity to request that CEC and/or the Council review the proposed adverse action for the purpose of determining whether any error or omission occurred in making the decision.

A written request for reconsideration must be received ~~in by~~ the Council ~~office~~ within 30 calendar days following receipt of the notification letter. If a request for reconsideration is not received within this 30-day period, the Council considers the provider to have waived all rights to reconsideration and subsequent appeal. The ~~p~~Provider ~~must is encouraged to~~ submit its written request to the Council ~~office~~ by a trackable delivery service. ~~email and certified mail, with a return receipt requested.~~

The request must include specific facts and reasons for which the ~~p~~Provider contends the adverse action should not be taken, ~~as well as an appropriate number of copies of substantiating materials.~~ Council staff acknowledges in writing the receipt of all reconsideration materials. Following receipt by Council staff, the materials are considered by CEC/Council by virtual meeting/conference call or at its next scheduled meeting. Reconsideration related to withholding of approval or withdrawal of approval must be considered by CEC/Council at its next meeting.

Reconsideration of the adverse action is completed no later than the next scheduled CEC meeting following the original determination. The director of continuing education and the chief administrative officer are notified of the CEC/Council action.

Based on a recommendation of CEC, a decision to sustain or rescind a proposed action to withhold or withdraw approval is considered by the Council as determined by the Council. at its next scheduled meeting. A recommendation may be made by CEC and/or the Council to assess the request for reconsideration by conducting an on-site evaluation of the provider. ~~The on-site evaluation is designed to evaluate the particular issues or concerns related to the adverse action.~~ When an on-site evaluation is conducted, action is deferred as determined by the Council. to the second scheduled meeting following the original determination of the adverse action. If an evaluation is conducted during procedural reconsideration, the Provider and the Council share the cost of the evaluation equally. The director of continuing education and the chief administrative officer are notified of the Council's action.

During the reconsideration process, a representative(s) of the pProvider under reconsideration may request in writing the opportunity to submit a statement to the CEC/Council regarding the proposed adverse action. Any additional information that is to be brought to the attention of the CEC/Council must be submitted to the Council office 60 calendar days prior to the meeting.

Appeal

Following completion of the procedural reconsideration and/or reconsideration processes, the provider may appeal the decision to the Ad Hoc Committee for Appeals. The appeal process followed by the Council is articulated in CPME 935b, *Guidelines for the Conduct of Appeals by Residencies, Fellowships, Providers of Continuing Education, and Specialty Boards*. The pProvider may pursue a substantive and/or procedural claim.

REAPPLICATION FOLLOWING WITHHOLDING OR WITHDRAWAL OF APPROVAL

A pProvider seeking approval of ~~an educational program~~ that has had provisional approval withheld or approval withdrawn is expected to follow the procedures outlined for new pProviders (see Application for Approval of a New Continuing Education Provider).

JOINT PROVIDER

A Joint Provider is an organization, that is not a commercial interest, choosing to collaborate with a Provider having approval or approval with report status to conduct a continuing education activity providing continuing education contact hours (CECH). The Joint Provider agreement must clearly identify the Provider.

~~An approved provider may elect to extend its approval to another institution, organization, or individual resulting in a joint provider. As indicated in CPME 720, the Council recognizes an institution, organization, or individual that conducts one or two continuing education offerings per year, for example, may not wish to pursue approval as a provider. For this reason, a joint provider status is permissible and encouraged; the non-approved organization may offer its activity under the auspices of an approved provider.~~

Requirement ~~4.6~~ 1.5 in CPME 720 outlines the requirements of an approved ~~P~~provider that elects to extend ~~j~~provider status to a non-approved organization. Activities provided in this manner **must be** reported as such in the ~~p~~provider's CPME 740, Annual Report for Continuing Education Providers in Podiatric Medicine~~annual report to the Council~~. A ~~p~~provider not reporting these activities will be placed on probation at the next meeting of the Council (see Annual Report).

Providers ~~approved on~~with ~~probationary or provisional approval~~ ~~a provisional or probationary status~~ may not ~~act as the approved Provider in Joint Provider agreements. extend joint provider approval to another organization. Providers approved on a probationary status may, however, extend joint status for activities contracted prior to institution of probationary status. Providers with probationary approval may fulfill previously executed joint providership agreements. The Provider is required to submit to the CEC and Council all executed Joint Provider agreements.~~

~~If a provider offers activities for which it has not been approved or authorized by the Council and in any way states or implies it is approved or authorized by the Council to offer these activities, then the provider will be placed on probation at the time of the next Council meeting.~~

The identified approved ~~p~~provider must be the entity ~~to~~issuing the document verifying attendance, not the Joint Provider~~the certificate of attendance, not the non-approved organization.~~

INACTIVE STATUS

Inactive status is given to Providers who fail to conduct an educational activity for three consecutive years immediately following completion of the last educational activity. If a provider's educational program that is inactive temporarily will be considered eligible for continued approval for a period not to exceed two~~three~~ years immediately following completion of the last educational activity. The Council may withdraw approval from Providers on inactive status. A provider that is not reactivated within two~~three~~ years must follow the application procedures for a new provider if and when the educational program is reinitiated.

All approved Providers, whether or not any education programs are conducted, with inactive, approved educational programs are required to submit an annual report forms and annual assessment fees throughout the recognized period of inactivation. During this period of inactivity, the provider is not required to submit a petition.

Once a provider decides to reactivate its educational program, if a petition was due during this period, the provider must submit a petition for the next scheduled CEC meeting. An inactive provider cannot offer an educational program until the Council reviews the provider's petition and grants approval status.

Collaborating with a joint pProvider constitutes active status for a pProvider, including when the joint activity is the pProvider's sole activity during the year. ~~For example, Provider A is considered active in the following situation:~~

~~Approved Provider A joins with approved Provider B, with Provider B serving as the primary provider of the activity. The activity produced through this collaboration is Provider A's sole activity during the year.~~

TERMINATION OF PROVIDER

If an approved pProvider ceases operations ~~or if for any other reason the educational program is discontinued~~, the Council will withdraw approval of the pProvider based on voluntary termination, effective on the date of closure of the pProvider or termination of the educational program. It is the responsibility of the director of continuing education and/or the chief administrative officer to notify the Council in writing of the termination of pProvider. The pProvider is responsible for notifying participants/registrants of any upcoming activities of the voluntary termination of the program of continuing education and implement their cancellation policy. The Provider is responsible for maintaining records verifying completion of the activity and number of CECH awarded each learner. Records must be securely maintained with backup for a minimum of five years.

ANNUAL REPORT

Completion of ~~an the~~ annual report ~~form~~, CPME 740, *Annual Report for Continuing Education Providers of Continuing Education in Podiatric Medicine*, is required of each approved pProvider, ~~beginning with the calendar year following application~~. The annual report provides the Council current information for CPME's database and the List of Approved Providers maintained on the Council's website.epme.org.

Council staff reviews annual reports regarding with emphasis on the determination of continuing education contact hours and acceptable educational activity content and brings concerns to the attention of CEC and/or Council at its next scheduled meeting. Council staff may correspond with the director to request that the pProvider submit specific information for consideration at the CEC meeting.

CEC and/or the Council reserve(s) the right to request additional materials to clarify information in the annual report. Failure to submit a complete and accurate report/annual report all activities in the annual report, including joint activities, will may result in a change of approval status by the Council. extension of probationary approval at the next Council meeting.

CONFIDENTIALITY AND DISCLOSURE POLICIES

All reports and communications regarding pProviders are confidential within the Council, CEC, Ad Hoc Committee for Appeals, evaluation teams, and Council staff. ~~On-site evaluators, Council members,~~ CEC members, Council members, consultants, evaluators, and staff sign a confidentiality statement on an annual basis, confirming privileged information will not be disclosed in any manner. to any person or entity.

All proceedings of CEC and the Council with respect to determining approval recommendations and actions are held in executive session.

Because of the relationship of approval and licensure, the Council has the prerogative of providing confidential information regarding the approval status of pProviders to state boards for examination and licensure, upon the specific written requests of these organizations. Council staff, CEC, and the Council will not release or confirm the following information in any form:

- The name or status of a pProvider initiating contact with the Council office concerning an application for approval.
- The name or status of a pProvider applying for approval that has not yet been apprised of an approval decision.
- The name or status of a pProvider that has applied for and been denied approval as a provider of continuing education ~~(prior to exhaustion of the procedural reconsideration, reconsideration, and appeal processes, as applicable).~~
- The name or status of a pProvider having approval withheld or withdrawn (prior to exhaustion of the procedural reconsideration, reconsideration, and appeal processes).

All inquiries as to the approval status of a specific pProvider will be answered by referral to the List of Approved Providers on the Council's website or to the pProvider(s) in question.

The List of Approved Providers on the Council's website and the List of Approval Actions identifies approved pProviders and their approval status ~~providers approved on a probationary basis.~~ Areas of noncompliance, as reflected by standard and requirement numbers, are included ~~in the probationary information when the provider is granted probationary approval.~~

Withholding of approval and withdrawal of approval are published following exhaustion of the entire process of procedural reconsideration, reconsideration, and appeal. ~~or following the provider's indication it does not wish to pursue these processes.~~ Voluntary termination is published following Council action.

~~The Council requires that~~ The pProviders is responsible for notifying the appropriate state boards for examination and licensure of final adverse actions. ~~upon completion of the reconsideration process.~~

REVIEW OF FORMAL COMPLAINTS

A mechanism exists for reviewing formal complaints against approved pProviders. The Council reviews only those complaints related to the alleged noncompliance of a pProvider with the Council's CPME 720, Standards and Requirements for Approval of Continuing Education Providers in Podiatric Medicine ~~standards and requirements.~~ The mechanism for reviewing formal complaints is specified in CPME 925b, Complaint Procedures (Committees).

STATEMENT OF APPROVAL STATUS

Approved pProviders must use the following statement in reference to ~~their~~ its approval status

~~in final activity materials/webpages, documentation of attendance, on-demand/instructional media, and other publications pertaining to the continuing education activity:
the brochure(s), websites, certificates, instructional media, or other publications (online or in print) pertaining to the program of continuing education:~~

“(Name of pPProvider) is approved by the Council on Podiatric Medical Education as a pPProvider of continuing education in podiatric medicine. (Name of pPProvider) has approved this activity for a maximum of _ continuing education contact hours.”

Joint pPProviders must use the following statement in reference to their approval status in the final activity materials/webpages, documentation of attendance, on-demand/instructional media, and other publications pertaining to the continuing education activity:
~~brochure(s), websites, certificates, instructional media, or other publications (online or in print) pertaining to the program of continuing education:~~

“This activity has been planned and implemented in accordance with the standards and requirements for approval of pPProviders of continuing education in podiatric medicine through a joint pPProvider agreement between (name of pPProvider) and (name of non-approved pPProvider). (Name of pPProvider) is approved by the Council on Podiatric Medical Education as a pPProvider of continuing education in podiatric medicine. (Name of pPProvider) has approved this activity for a maximum of __ continuing education contact hours.”

~~No other statements regarding approval by the Council may be used.~~

ASSESSMENT OF EVALUATOR EFFECTIVENESS

~~The provider, the evaluator(s), and Council staff assess the effectiveness of the on-site evaluation process formally. CEC and the Executive Committee of the Council review evaluator performance. The Council commends effective evaluators and provides remediation for ineffective evaluators. CEC and/or the Executive Committee may suggest to the Council evaluators who demonstrate repeated ineffectiveness be removed from the list of continuing education evaluators.~~

The effectiveness of the on-site and virtual evaluation process is assessed formally by the institution and the evaluation team. The Executive Committee of the Council monitors the effectiveness of on-site evaluators by reviewing evaluation questionnaires completed by institutions regarding the performance of on-site evaluators, as well as those completed by the team leaders and other team members. The Executive Committee forwards a report of its review, identifying areas requiring follow-up and evaluators who might require remediation or dismissal to the Council for its review.

In reviewing evaluation team reports, the CEC may forward comments about individual evaluators to the Council’s Executive Committee. To assure objectivity in its approval recommendations, the CEC is never provided the post-evaluation questionnaires completed by the sponsoring institution and evaluation team members.

The Council commends effective evaluators and provides remediation for ineffective evaluators. The CEC and/or the Executive Committee may suggest to the Council that evaluators who demonstrate repeated ineffectiveness be removed from the list of Continuing Education Provider evaluators.

NONDISCRIMINATION POLICY

~~The Council prohibits discrimination in accord with federal, state, and local regulatory guidelines and policies in the election and appointment of members, students, and public representatives to the Council and its committees and in the selection of evaluation team members, consultants, employees, and others involved in its activities.~~

The Council prohibits discrimination related to all of its activities on the basis of sex, creed, race, national origin, age, color, sexual orientation, gender identification, political belief, disability, or any other factor protected by law.

FEE POLICIES

Fees have been established for ~~p~~P Providers seeking approval and the submission of petitions and annual reports. Continuing Education Fees are on the [Council's website](#).

All costs related to ~~on-site~~ evaluations of new and approved ~~p~~P Providers are borne by the ~~p~~P Provider. The Council requires pre-payment of a specified ~~on-site~~ evaluation fee. Following the ~~on-site~~ evaluation, the Council ~~office bills/invoices~~ the ~~p~~P Provider for the remainder of the full cost of the ~~visit/evaluation~~. In the event a reverse site visit is scheduled, the ~~p~~P Provider is responsible for all expenses associated with its representatives' attendance at a committee meeting. ~~If a scheduled on-site evaluation is canceled because key participants in the program are unavailable, rescheduling of the visit or evaluation is possible but only at the expense of the provider.~~

If an evaluation is conducted for the purpose of reconsideration, the Provider and the Council share the cost of the evaluation equally. If the Provider cancels or reschedules, any resulting penalties, fees, or increased costs are the responsibility of the Provider.

Providers having approval withheld or approval withdrawn and subsequently reapply, must submit ~~another~~ reapplication fee.

The Council has established an annual fee that is assessed to each approved ~~p~~P Provider. A late fee is assessed to all fees not paid by the date identified by the Council.

Providers requesting appeals of adverse actions are assessed a portion of the anticipated actual costs prior to the appeal. Providers are ~~billed/invoiced~~ the remainder of any additional actual costs after the appeal.

~~The All~~ fees are nonrefundable. The Council reserves the right to revise established fees.

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