



September 10, 2013

Board of Psychology
Continuing Education Committee
1625 North Market
Sacramento, CA 95834

Dr. Gallardo –

Thank you for requesting our feedback on the proposed CPD regulations. Dr. Linder Crow and I have reviewed the draft version you provided and we have several comments; some to suggest specific language changes and some more general concerns. Working through the document in regulation order:

1397.60 Definitions - concern for clarity, suggested language

Continuing Professional Development (CPD) ~~Activity~~ means one of earning and documenting 36 CE credits per renewal period selected from twelve continuing education (CE) learning activities grouped under four different categories. The four categories and twelve We suggest dropping the intervening sentence as it sounds more like a rationale than a regulation.

1397.60 (a) and (b) – suggested clarifying reference.

“. . . an institution ~~that~~ whose degree meets the requirements ~~set forth in~~ of. . . should be “. . . an institution ~~that~~ meets the requirements ~~set forth in~~ of Section 2914. . . . Reference in code is to the institution and not to the degree.

1397.60 (c) suggested clarifying and streamlined language

“Board Certification” means earning a certification, or a Senior Option Certification, from the American Board of Professional Psychology (ABPP). *Strike out subsection a. as repetitive.*

1397.60 (d) recommend insertion of new definition (original 1397.60 (c)) with minor clarification

A “course” or “presentation” means an approved systematic learning experience of at least one hour in length. One hour shall consist of 60 minutes of actual instruction. Courses or presentations less than one hour in duration shall not be approved. Courses more than one hour in length shall be in quarter hour increments. OR Courses more than one hour in length shall be in half or full hour increments.

CPA does not have a preference as to whether or not quarter hours are accepted. CPA's preference, based on Accrediting Agency (AA) experience, is that this is clearly defined in regulation. This will make auditing much easier and provide guidance when assessing four - 20 minute presentations bundled into one convention session.

1397.60 (de) (if there is a new section (d) inserted) *suggested minor clarifications to referent, grammar and to streamline language.*

"Conference/Convention" means attending a professional gathering that consists of . . . ~~Continuing Education~~ CE credit can be accrued for Conference/Convention activities attendance in addition to credit for recognized CE credit earned for sessions at the same conference/convention." for which the attendee does not otherwise earn credit for CE hours for Recognized Continuing Education.

1397.60 (fg) *suggested change to grammar for clarity*

"Professional Activities" . . . scientific grant review teams, or boards member of a regulatory body.

1397.60 (kl) Recognized Continuing Education (2) – *suggested replacement language for precision, clarity and streamlining*

(12) *"Independent Learning" means all forms of organized and directed learning that occur when the instructor and the student are not in real time/synchronous visual or auditory contact.*

This establishes that the only difference between independent and 'face-to-face' learning is real time contact.

1397.60 (lm) *the draft has a question about the word intern. We know that this is a technical issue concerning the supervision regulatory language but would like to ensure that all post-doc supervision earns CE credit. Also impacts Matrix language in B(8)*

1397.61 (a) – *How would this be implemented for new licensees? 50% max of credit earned via recognized CE, of which half could be independent learning? For clarity, this might be a good place to repeat that this is a 36 hour continuing education requirement (4th line.)*

1397.61 (b) (c) - *As noted, is the language intended to be parallel in these two sections? (i.e., obtain training vs continuing education.) If formal training is not required, does the implied requirement of documentation apply?*

Actually, the first question may be - is there an implied requirement for documentation of these two content areas? They are not listed on the matrix. Would documentation for these content areas be part of a CE audit?

There was a discussion of adding “scary” language to emphasize the importance of, specifically (b), the law and ethics content requirement. Mention of the need for documentation as to how the activity (formal training or other CE activity) meets the content requirement might be both sufficient emphasis and make explicit an implicit expectation.

Comment [cwm10] - what is the ISR? If it is the rationale for subsection (c), CPA supports its inclusion.

Matrix - *This is the place where we see the confusion as most evident between the terms CE hours and CE credits. We believe both columns need to be labeled as credits (i.e., Max # of credits allowed and Value of credits) with the term “hour” referencing only a specific passage of time; i.e., 60 minute hour. This would require a find and individually replace each reference to hour to see if the word credit needs to be substituted.*

Template language (Licensee shall maintain a record of hours served for submission to the Board) might read better if adapted more closely to each type of requirement; e.g., Conference/Convention. Might also be helpful to request the dates the activities occurred in addition to the number of hours.

Recommend, based on AA experience, the word “full” be added to clarify a conference and a seminar day. Recommend that “calendar” be added to clarify a year.

A. Professional Activity (1) - *in earlier language, the names of the others in the peer consultation group was required as part of the documentation. Was that dropped intentionally? Would it be better to ask for a description of the consultation group that includes # of members, frequency of meetings and a brief description of how they are organized or function? No need for names.*

A. Professional Activity (3) - *If one calendar year of service equals 9 CE credits; does that mean 6 months of service equals 4.5 hours? Would it also mean that three months of service equals 2 (or 2.25 depending on the outcome of the earlier recommended change to 1397.60 (d))?*

A. Professional Activity (4) - *replace ‘sponsor with ‘recognized’. Suggest change in template documentation language to be a record of names and dates of conventions/conferences.*

B. Academic (6) - *Quarter is generally abbreviated as Qtr rather than Qu. The only reference accepting an undergraduate course for CE credit was in Academic Instruction; not for attending and claiming credit.*

B. Academic (7) - *(Maximum # allowed column) should be . . . renewal period **or** in any. . . rather than ‘renewal period **of** in any. . .’*

C. Recognized CE (10) – re: above question about 1397.61 (a), would it be helpful to clarify in the first column that no more than 50% of recognized CE be earned by independent learning? i.e., if a licensee only earns 12 hours of recognized CE, then at least 6 has to be face-to-face. Is that the intent of the Board’s requirement? Or, if they only earn 9 credits of recognized CE in total, can all nine hours be independent learning?

1397.61 (f) (1) (C) – Technical language change. Replace word ‘sponsors’ with ‘providers.’

1397.61 (g) – We find that it is confusing when some of the documentation requirements are listed in the definition of the activity (e.g., POM) some on the matrix and some as a subsection in the regulations. This subsection would appear to apply to all 12 activities and the phrase (if any) does not provide sufficient clarification. Does the requirement for a syllabus or course description really only apply to recognized CE courses? Can the placement of documentation requirements be consistent so that they are either in the definition or part of the matrix or integrated into the log that will need to be kept?

Again, thank you for requesting our input. We regret that neither of us is able to travel to attend this meeting of the CE Committee. If you have any questions, please let us know.

Respectfully,



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