



AMERICAN PSYCHOLOGICAL ASSOCIATION
APPROVAL OF SPONSORS OF CONTINUING EDUCATION
FOR PSYCHOLOGISTS:

Policies and Procedures Manual

February 2006



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PSYCHOLOGICAL
ASSOCIATION

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CONTINUING EDUCATION SPONSOR APPROVAL SYSTEM

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PREFACE

This document is the most recent revision of the document originally entitled *APA Approval of Sponsors of Continuing Education for Psychologists Criteria and Procedures Manual*, first approved by the American Psychological Association Council of Representatives in January 1987.

Changes to the policies and procedures of the Sponsor Approval System contained in this manual are recommended by the Continuing Education Committee and require approval by the Board of Educational Affairs, the Board of Directors, and in some cases the Council of Representatives. Amendments with broad or major policy implications require approval by the Council of Representatives. Amendments to general policies and procedures may be approved by the Board of Directors on behalf of the Council of Representatives.

This revision is effective as of February 19, 2006 and supersedes all previous versions.

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APPENDIX 1

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Structure of the Continuing Education Committee

The APA Continuing Education Committee (hereinafter referred to as the CE Committee or the Committee) reviews and acts upon applications from organizations that offer continuing education programs for psychologists. Organizations that seek approval from APA as sponsors of continuing education must demonstrate that they meet the set of standards and criteria described in the *APA Standards and Criteria for Approval of Sponsors of Continuing Education for Psychologists (April 2005)*. By design, APA approval is at the organizational level only. The CE Committee does not review and approve the individual programs of sponsoring organizations on an on-going basis, although examples of individual programs are used by organizations in the application process to demonstrate their ability to administer a CE program that meets these standards.

The Committee is composed of members appointed by the APA's Board of Educational Affairs, with nominations solicited openly by means of the nomination process as specified in the APA Association Rules. In appointing members, individuals are selected who have expertise and experience in CE program planning, administration, and evaluation, and who broadly represent the major fields of psychology, various geographic regions, and individual characteristics such as sex and ethnic or cultural identity. Members of the Committee serve a three-year term, with at least 2 new members appointed each year.

Function of the Continuing Education Committee

The CE Sponsor Approval System was created by APA to facilitate psychologists' access to CE programs offered by organizations that have come under careful review and that meet the APA standards as set forth in the *APA Standards and Criteria for Approval of Sponsors of Continuing Education for Psychologists*.

APA's CE Sponsor Approval System:

1. Encourages continuing and professional education among psychologists;
2. Encourages the development of high-quality CE programs;
3. Offers psychologists access to CE programs offered by APA-approved sponsors; and
4. Provides technical assistance and guidance to organizations in the development or improvement of existing CE programs.

In reviewing applicants and monitoring approved sponsors, the Committee is committed to following the guidelines as established in the *American Psychological Association Standards and Criteria for Approval of Sponsors of Continuing Education for Psychologists*. The Committee reports to the Board of Educational Affairs and operates as a part of the overall governance structure of the American Psychological Association. The work of the Committee in approving sponsors of CE is kept confidential, with the following exceptions: (a) when disclosure is legally advisable or required; (b) when information is shared, as needed, with APA's legal counsel; and (c) when approved confidential minutes of the Committee's meetings are made available to the Board of Educational Affairs, the Executive Director of the Education Directorate, the APA Executive Officer, the Board of Directors, or the relevant CE Office or other APA staff. The Committee also

reserves the right to seek expert advice and relevant information from external sources when reviewing an application, provided that such advice is kept confidential by the Committee and the advisor and that there is no possible conflict of interest. Aggregate data based on routine reports from APA-approved sponsors may occasionally be used to provide general information about the activities of the APA CE Sponsor Approval System.

APPLICATION REVIEW

How to Apply

In order to obtain APA-approval as a sponsor of CE for psychologists, organizations must submit an application for review by the Committee. The original and three copies of the application, along with supporting materials, must be accompanied by a nonrefundable check covering the appropriate application fee. Applicants who would like assistance in completing the application may write or call the APA CE Sponsor Approval System. The application and all subsequent communications should be forwarded to: CE Sponsor Approval System, American Psychological Association, 750 First Street, NE, Washington, DC 20002-4242. For costs involved in applying for and maintaining APA approval see Appendix 1 of this manual. Upon request, Sponsor Approval System staff will review draft applications and provide feedback to applicants assuming that a draft is received at least one month in advance of the application deadline. Review of draft applications by staff does not imply an approval decision by the Committee.

When to Apply

The Committee reviews applications for approval twice a year, and application deadlines are February 1 and August 1 of each year. Approval will be based on the extent to which the applicant is judged to meet the *Standards and Criteria* of the Sponsor Approval System.

In addition to the information and materials supplied by the applicant, the Committee reserves the right to consult other sources of information as appropriate. Under special circumstances, the Committee may request a site visit with the cost of this visit borne by the sponsor.

Who Should Apply

The Sponsor Approval System encourages applications from organizations that have a commitment to continuing education for psychologists. Approved sponsors represent a wide range of organizational settings, including: APA divisions, state and regional psychological associations, departments of psychology or other divisions within universities or colleges, professional schools of psychology, private organizations, professional societies and associations, hospitals, medical schools, mental health centers, government agencies, and individuals. Any organization that offers continuing education that is relevant to the field of psychology and involves doctoral-level psychologists in all aspects of program planning and development is welcome to apply provided that the organization's mission and basic tenets and/or program offerings are consistent with APA policy.

TYPES OF COMMITTEE ACTION

The Committee meets approximately 6 weeks after the application deadlines. Sponsors and sponsor applicants will be informed of the Committee's decision shortly after the meeting. Decisions of the Committee are by majority vote.

2 Year Preliminary Approval

2 Year Preliminary Approval is granted to first time applicants who meet the standards and criteria as outlined in the *Standards and Criteria* manual. At the end of the preliminary approval period, sponsors must reapply for continuation of approval by submitting a full application. During the preliminary approval period, sponsors will be required to address any shortcomings noted by the Committee at the time preliminary approval was granted. At the end of the 2 Year Preliminary Approval period, sponsors apply for a five-year period of time.

5 Year Full Approval

5 Year Full Approval is granted to applicants who have successfully completed a 2 Year Preliminary Approval period and submitted an application that satisfactorily addresses any shortcomings noted by the Committee at the time of the last approval. A full renewal application must be submitted at the end of the five-year period.

Inquiry

Inquiry may be made if the Committee requires timely clarification of an apparent misuse or misunderstanding of one or more points of the standards and/or criteria. At the time of the Review Report, the Committee makes inquiry into the suspected standards/criteria violation or concern and asks for a response within a specific time frame (usually 30 days). Staff then reviews the response for its thoroughness in addressing and/or correcting the concern(s) and determines whether the response is sufficient. If staff deems the response insufficient in addressing the concerns, the materials will be forwarded to the Committee members who initially reviewed the application, and they will determine if probation should be put into effect. If the sponsor does not respond to the inquiry by the specified deadline, it will be placed on probation for 30 days, after which termination of approval will occur if a response is not forthcoming. Inquiries may be made with either 2-year or 5-year approval decisions.

1 Year Conditional Approval

1 Year Conditional Approval may be granted to applicants who have completed, at a minimum, a 2 Year Preliminary Approval period but do not meet all of the SAS standards and criteria. Conditional approval is for a period of one year, at which time sponsors must reapply with attention given to the specific areas of concern indicated by the Committee at the time of conditional approval. Conditionally approved sponsors retain the benefits, rights, and responsibilities of preliminary or fully approved sponsors.

Conditional approval may be granted at any point in the approval cycle after the initial 2 Year Preliminary Approval is completed (i.e., at any time a reapplication is required, either after the initial two-year period or after a five-year approval period). After one year of conditional approval, a second conditional year can be granted if issues of concern remain. Conditional approval may be granted only twice consecutively for any approval cycle. Should the sponsor not adequately remedy any areas of concern after the second conditional year of approval, further approval will be denied.

Probation

If the Committee has concerns that go beyond an Inquiry decision, sponsors may be put on probation for a specified length of time. The length of the probation will vary depending on the nature of the concern. During this time, the sponsor's activities may be monitored more closely. If the concern(s) is not adequately addressed by the end of the probationary period, or the sponsor fails to respond, approval may be terminated. A probationary status is normally applied to a One Year Conditional or 5-year approval decision.

Deferral

The Committee may defer action on an application if more information is needed to allow the Committee to make a decision about the organization's capability to offer CE for psychologists in compliance with the SAS standards and criteria. The applicant will receive a request for more information by a specified deadline, and this information will be reviewed at the next regularly scheduled meeting of the Committee.

The purpose of a deferral is to allow the Committee to request clarification on procedures that were in place at the time of the application. New procedures adopted subsequent to a deferral will not be considered during the Committee's review of the response to deferral. If the requested information is not forthcoming by the next meeting of the Committee, the application will be considered inactive. Any request for approval at a later time will require a new application. Only applications submitted by new applicants may be deferred.

Denial

Applicants who do not provide adequate evidence of meeting the SAS standards and criteria will not be approved. The reasons for denial will be specified in a written report to the applicant. A decision to deny can be handed down (a) at initial application review; (b) at application review after preliminary approval; (c) at application review after first conditional approval; (d) at application review after second conditional approval; and (e) at review after any five-year full approval. Applicants denied approval may reapply in one-year's time or request reconsideration or formal appeal of the adverse decision (see **Procedures for Reconsideration and Appeal of Decisions**).

TERMS OF APPROVAL

Responsibilities of the Approved Sponsor to APA

1. APA-approved sponsors must conform to the APA CE Sponsor Approval System *Standards and Criteria*.

Approved sponsors agree to conduct CE activities in conformance with the SAS standards and criteria set forth in the *Standards and Criteria*. Sponsors in violation of the standards and/or criteria will be subject to probation or termination of approval.

2. Sponsors must pay scheduled fees (see **Appendix 1** for amounts and schedule of payment):
 - a. Application review fee: nonrefundable, due with any application requiring Committee review.
 - b. Recognition fee: one time only as long as approval is continuous; due upon preliminary approval.
 - c. Annual fee: due for each year of approval.

Nonpayment of fees will result in probation and, ultimately, in termination of approval. New applications will not be reviewed or activated until appropriate fees are paid.

3. Sponsors must submit an annual Activity Summary Form.

The Activity Summary Form is sent at the same time as the annual fee invoice in years in which a renewal application is not due. The Activity Summary Form lists all activities offered by the sponsor in the previous year and must include a promotional piece for each corresponding program. Sponsors who have not offered any programs are still required to return the form. Failure to submit an Activity Summary Form will result in probation and, ultimately, in termination of approval. In addition, staff may make inquiry into programs that appear to be in violation of the *Standards and Criteria* (i.e., are not relevant to psychological practice, theory and method, or are not at a post-doctoral level).

4. Sponsors must submit Status Reports.

APA-approved sponsors must submit Status Reports that respond to issues raised in the Review Report. Status Report Requirements will be mailed approximately two months prior to the Status Report submission deadline. Status Reports are due one year after approval for two-year and five-year approvals. Conditionally approved sponsors will not submit Status Reports because they will be reapplying at the end of one year. Sponsors will be notified in advance of the due date. Failure to submit Status Reports will result in probation and, ultimately, in termination of approval.

Responsibilities of APA to the Approved Sponsor

1. APA-approved sponsors may list programs in the CE Calendar.

A calendar of CE activities offered by approved sponsors is listed on the APA website. To list offerings in the CE Calendar, an approved sponsor must complete the online CE Calendar Listing Form. Alternatively, sponsors may mail or fax completed listings to the Sponsor Approval System.

2. APA-approved sponsors are entitled to reduced advertising rates in the *APA Monitor* and may purchase APA membership mailing lists.
3. APA-approved sponsors will receive a complimentary subscription to the *APA Monitor*, a monthly publication for APA members.
4. Sponsors will be listed on the APA website.

CHANGES IN APPROVAL STATUS

APA-Approved Sponsors May Be Reassessed

Approved sponsors may be reassessed under the following circumstances:

1. Failure to comply with the Terms of Approval outlined in this manual.
2. Substantial changes in a sponsor's goals, activities or administration.
3. Indications that a sponsor's CE activities fail to meet the requirements of the *SAS Standards and Criteria*.
4. The planning, evaluation and other procedures followed by the sponsor are substantially inconsistent with those described in the sponsor's application.

Under any of these circumstances, the sponsor may be reevaluated and a decision as to continuation of approval will be made. Reassessment may result in probation or termination of approval.

APA-Approved Sponsors May Request Inactive Status

When no CE activities are planned for a period of one year, fully approved sponsors may request inactive status for that year. The request must be made in writing prior to the time that inactive status will begin, and will not be granted retroactively.

Terms of inactive status are as follows:

1. The annual fee billed during the inactive year will be one half of the amount required for active status.
2. The name of the organization will remain in the APA master listing of APA-approved sponsors.
3. Inactive sponsors may not:
 - a. use the statement of APA approval;
 - b. list any programs in the CE Calendar;
 - c. obtain reduced advertising rates in the *APA Monitor*.
4. If the sponsor wishes to regain active status at any time prior to the end of one year, the balance of the full annual fee for active status must be paid before action may be taken.
5. Inactive status will not extend the period of approval.
6. Sponsors granted inactive status for a particular year may offer full credit for activities that began when the sponsor was active and conclude in the inactive year.
7. If inactive status has been requested in a year that a Status Report is due, the sponsor is still required to submit a Status Report and address previous concerns.

APA-Approved Sponsors May be Placed on Probation

If an approved sponsor's activities do not meet the *Standards and Criteria* of the Sponsor Approval System, or if a sponsor fails to comply with the Terms of Approval as outlined in this manual, the sponsor may be placed on probation. The reasons for and length of the probationary period will be outlined in writing to the sponsor. Although retaining approval status, the sponsor's activities will be closely monitored during this period.

At the end of the period of probation, the sponsor must provide documentation of compliance with the issues raised in the notification-of-probation letter. If such documentation is not provided, approval will be terminated. If approval is terminated, the sponsor must submit a new application in order to regain approval status.

APA-Approved Sponsors May Not Withdraw if a Complaint Against Them is Pending

APA has an established grievance procedure that includes informing approved sponsors when another organization or individual brings a complaint against them. Once the sponsor has been informed of the complaint, it cannot withdraw from the Sponsor Approval System until the complaint has been resolved.

PROCEDURES FOR RECONSIDERATION AND APPEAL OF DECISIONS

The following decisions made by the Continuing Education Committee (the “Committee”) are considered adverse decisions for which the sponsor or applicant (“sponsor/applicant”) may request reconsideration or formal appeal in accordance with the procedures outlined below:

1. Denial
2. Probation or continued probation
3. Termination of Approval

Such decision by the Committee shall be transmitted to the sponsor/applicant in a notification letter. The letter of notification shall include the basis for the adverse decision and inform the sponsor/applicant of the right to request reconsideration of the decision by the Committee.

A request for reconsideration is required prior to formal appeal. If the Committee votes to uphold its adverse decision following the request for reconsideration, the sponsor/ applicant will then have the right to request an appeal of the decision.

A written request for reconsideration or appeal that is timely filed by a sponsor/applicant shall stay the adverse decision until the reconsideration or appeal hearing by an appeal panel is completed. The approval status of the organization during the process of reconsideration or appeal shall remain as it was prior to the adverse decision.

Request for Reconsideration

If reconsideration of an adverse decision is desired, a written request for reconsideration shall be submitted to the Sponsor Approval System within 30 days following the date of receipt of the notification letter detailing the basis for denial.

Reconsideration shall be based *only* on the information before the Committee at the time of its initial decision. If the sponsor/applicant seeks to submit revised information in response to Committee concerns (e.g., changes in the organization or programs since the initial decision), a new application must be filed and a request for reconsideration will not be entertained. All materials in support of the reconsideration must be submitted by the next Sponsor Approval System application deadline (February 1 or August 1).

The reconsideration will occur at the next regularly scheduled meeting of the Committee and shall be at no additional cost to the sponsor/applicant. If, following the reconsideration, the Committee upholds its initial decision, the sponsor/applicant may request a hearing before an appeal panel.

Appeal

1. Filing an Appeal

A sponsor/applicant may challenge an adverse decision within 30 days of receipt of written notice of the Committee's adverse decision on reconsideration. The appeal must be based only on the grounds that the Committee's decision was (1) arbitrary, capricious or otherwise not in accordance with the standards and criteria and the procedures of the Committee; or (2) not supported by substantial evidence. The request for appeal shall include a statement of reasons for appealing the decision of the Committee. Any issue not specified in the request for appeal will not be considered on appeal. The appeal should be addressed to the President of APA. A nonrefundable appeal fee will be charged to the appellant organization, such fee to be submitted with the organization's letter of appeal. If no timely request is received, the decision of the Committee shall be considered final.

2. Appointment of an Appeal Panel

Within 60 days of receipt of the sponsor/applicant's letter of appeal, the Sponsor Approval System will provide the sponsor/applicant with a list of three (3) potential appeal panel candidates from a list of potential panel members designated by the APA Board of Educational Affairs. None of the appeal panel candidates will have had a prior connection with the sponsor/applicant or with the approval process related to the sponsor/applicant. Panelists need not have a particular specialty or be from a particular geographic location. Within 30 days, the sponsor/applicant may challenge any of the designated panelists for due cause (e.g., conflict of interest, bias, or other prejudicial infirmity). If the sponsor/applicant shows due cause why a named panel candidate is unacceptable, an alternative will be selected in the same manner as the initial three (3) panelists as a replacement. The replacement may also be challenged for due cause. This procedure will be used until three (3) acceptable panelists have been selected. If the organization does not notify the Sponsor Approval System of any objections within 30 days, the Board of Educational Affairs will designate these three members to serve on the appeal panel. The Board of Educational Affairs will designate one of the three panelists as chair of the appeal panel. The Board of Directors of APA will also be informed of the appeals panel's composition.

3. Scope and Conduct of Appeal

An appeal is a challenge of the decision of the Committee based on the evidence before the Committee at the time of its decision. The Committee's decision should not be reversed by the appeal panel unless such decision was arbitrary, capricious or otherwise not in accordance with the standards and criteria and the procedures of the Committee; or was not supported by substantial evidence. Accordingly, the appeal panel should not substitute its

judgment for that of the Committee merely because it would have reached a different decision had it heard the matter originally. If an issue requires a legal interpretation of the Committee's procedures or otherwise raises a legal issue, the issue may be resolved by APA legal counsel instead of the appeal panel.

The procedural and substantive issues addressed by the appeal panel will be limited to those stated in the organization's appeal letter.

Only the facts or materials that were before the Committee at the time of its final decision and information submitted as part of a request for reconsideration may be considered by the panel. The panel will be provided with only those documents reviewed by the Committee in making its decision, the letter that notified the sponsor/applicant of the Committee's decision, the letter of appeal, written briefs submitted by the sponsor/applicant, and reply briefs submitted by the Committee. The letter of appeal and written briefs shall not refer to facts or materials that were not before the Committee. Any additional information supplied by the sponsor/applicant in the written briefs cannot describe new components of the sponsor/applicant or changes made subsequent to initial review/action. Any such new information will not be considered by the appeal panel. The aforementioned materials must be provided at least 30 days before the date of the appeal hearing.

The appeal panel will convene a hearing via conference call at a date and time acceptable to all parties. In exceptional circumstances and at the expense of the sponsor/applicant, an in-person hearing may take place. In addition to the three members of the appeal panel, the appeal hearing will be attended by one or more sponsor/applicant representatives, one or more representatives from the Committee, and staff of the Sponsor Approval System. Separate legal counsel also may accompany either party.

When legal counsel attends and participates in the hearing, it is with the understanding that they recognize the proceedings are not a judicial forum, but a forum to review the Committee's decision in terms of procedural violations or substantive error.

APA's legal counsel will also attend the hearing. In addition to advising APA, the counsel has responsibility to assure compliance with the Sponsor Approval System Policy and Procedures Manual and may resolve legal or procedural issues or can advise the panel.

At the hearing, the sponsor/applicant's representative, including counsel, shall first present arguments regarding issues raised on appeal. The Committee's representative shall be allowed to ask questions and make the Committee's presentation. After questions of the Committee's representative by the sponsor/applicant, both sides shall be allowed closing statements. The appeal panel may depart from this format should considerations of fairness so require. The appeal panel shall also be free to interrupt with questions of its own during any part of the hearing.

The burden of proof shall lie with the sponsor/applicant.

4. Decision and Report of the Appeal Panel

The Committee's decision should be affirmed unless such decision was (1) arbitrary, capricious or otherwise not in accordance with the standards and criteria and the procedures of the Committee; or (2) not supported by substantial evidence. The appeal panel shall have the power to grant full or conditional approval, to deny approval, to terminate approval, or to order further proceedings of the Committee. The decision of the appeal panel shall be by majority vote.

The report of the appeal panel will state its decision and the basis of that decision based on the evidence before the panel. The report of the panel will be addressed to the President of APA and sent within 30 days of the hearing. Copies will be provided to the sponsor/applicant, the Chair of the Continuing Education Committee, the Chair of the Board of Educational Affairs, and the Sponsor Approval System Office. The appeal panel decision may also be shared with the full Continuing Education Committee, Board of Educational Affairs, or the APA Board of Directors in certain circumstances.

SAS COMPLAINT PROCEDURES

In the event that the Sponsor Approval System receives an inquiry and/or becomes aware of activity that may relate to a potential violation of the *APA Approval of Sponsors of Continuing Education for Psychologists Criteria and Procedures Manual* the following will be used to address the potential violation (hereby referred to as a complaint):

1. The APA CE Sponsor Approval System staff will notify the Chair of the Continuing Education Committee (CEC) of the complaint; the nature of the complaint may be further clarified as necessary with the complainant.
2. The complainant will be informed that the sponsor has received the complaint.
3. The sponsor will be informed in writing of the nature of the complaint as it relates to the potentially relevant criteria and given the opportunity to respond within a specific time period.
4. Upon review of the response from the sponsor, APA staff will request any additional information that is needed.
5. APA staff will review the complaint and the response from the sponsor and will refer the complaint to members of the CEC who are designated to review complaints.
6. In the event of a complaint related to program content, a subcommittee of APA members with relevant expertise may be appointed to serve in a consultative role to the CEC to determine whether or not the course content is based on data, theory, and/or research that is reasonably relied upon in the profession (see discussion under criteria H).
7. Following consultation, if appropriate, with the subcommittee of APA members, the subcommittee of CEC will report its recommendations for action to the full CEC.

8. The CEC will make a determination of action to be taken regarding the complaint, and will notify the APA Sponsor Approval System.
9. The APA Sponsor Approval System, on behalf of CEC, will forward a response to the sponsor that may include any of the following:
 - a) an educative letter, with documentation to the file. This may include a no-fault letter, a letter clarifying and explaining the criteria and issuing a warning, or a sanctions letter,
 - b) a reduction of the current approval period,
 - c) loss of sponsorship privileges, e.g. ability to co-sponsor programs or offer independent study, or
 - d) loss of approval status* (* sponsor will receive additional information on appeals procedure.)
10. The complainant will be notified by the Sponsor Approval System of any action related to the complaint.
11. In addition to processing received complaints, the CEC reserves the right to independently pursue any inquiry or complaint that comes to its attention.

**AMERICAN PSYCHOLOGICAL ASSOCIATION
CONTINUING EDUCATION SPONSOR APPROVAL SYSTEM**

2006 FEE SCHEDULE

Type of Fee	APA Division, State or Regional Association	Others
Application Fee -Due with application	\$180	\$300
Recognition Fee -Due with invoice after initial approval, one time, only for as long as approval is maintained.	\$360	\$600
Annual Fee -Due with invoice at the beginning of each approval year, including the first year.	\$240	\$400
Inactive Status Annual Fee -Inactive status must be requested in writing.	\$120	\$200