Tips for Writing CE Provider Policies

The purpose of this tip sheet is twofold. It is intended to help CE Providers better understand NBCC Continuing Education Provider Policy (Policy) sections that require CE Providers to maintain written and published policies pertaining to CE programming procedures. In addition, it supports CE Providers as they evaluate their own policies and procedures to determine if they sufficiently meet their own needs and satisfy Policy.

Below is a review of policies that are required by NBCC. Keep in mind, when writing policies and procedures, the CE Provider must take ownership and tailor them to address their needs rather than quoting NBCC’s Policy, or stating or implying that NBCC requires a specific policy and/or procedure.

Confidentiality of Participant Information (Policy Section C.11)

The CE Provider must maintain a policy concerning the confidentiality and security of participant information.

- The CE Provider must protect participant information received during registration, such as name, address, social security number, telephone number, email address, and financial information.

- If the CE Provider plans to offer NBCC credit for a home study program that includes a recorded webinar or in-person training, the CE Provider must ensure that participants are not identifiable through name, image, or any other means or the CE Provider must have proper consent from the participants allowing it to use their image, name, etc. in the home study program.

Program Complaints (Policy Section C.12)

The CE Provider must maintain a policy concerning the review and resolution of program participant complaints and disputes related to its CE programs.

- A wide variety of statements can be used to meet this requirement; however, the main point of this policy is to provide an avenue for a complaint to be heard and responded to in a timely manner. Here is an example:

  “If a participant or potential participant would like to express a concern about [the CE Provider] or a continuing education program provided by [the CE Provider], the individual may call [telephone number] or email [email address]. Although we do not guarantee a particular outcome, [the CE Provider] will consider the complaint, make any necessary decisions, and respond within [a reasonable time].”

Fees, Refunds, and Cancellation (Policy Section C.12)

The CE Provider must maintain policies concerning program fees, refunds, and participant cancellation. A wide variety of statements can be used to satisfy this Policy requirement; however, the basic concept is for providers to inform participants prior to registration about what they can expect concerning fees, refunds, and cancellations initiated by either the CE Provider or the participant.
In addition, CE Providers should consider developing policies and procedures concerning the matters listed below to further enhance the quality of their business practices and ensure consistency. It is helpful to have policies or guidelines in place before a problem arises.

Confidentiality Breaches. (Policy Section C.11)
Consider how the CE Provider will handle a confidentiality breach, such as notification to the affected parties.

Attendance. (Policy Sections I.1, I.2, and I.4)
Think about how the CE Provider will handle situations when a participant does not follow instructions related to attendance verification or the CE Provider has conflicting information about a participant's attendance.

Consider whether the CE Provider will allow any credit for partial attendance. If not, it is important to make this clear prior to registration.

Enduring Materials. (Policy Sections D.5 and J.6 (b))
Consider how the CE Provider will ensure that enduring materials used in home study programs remain current, such as establishing requirements for systematic review, audit, and/or program retirement.

Record Keeping and Retention. (Policy Section C.10)
NBCC established this requirement, but it is up to the CE Provider to determine how to ensure the requirement is satisfied.

Disclosure or Use of Client Information in a CE Program. (Policy Section D.6)
Client information must not be disclosed by a presenter or participant unless proper informed consent has been obtained for use in a continuing education program.

Composites of real-life case examples are commonly used in continuing education programs to provide examples or facilitate role plays or discussion while maintaining confidentiality.

ADA Accommodations. (Policy Sections C.5 and C.6)
Consider how the CE Provider will give participants the means to request accommodations and how the CE Provider will evaluate the request and respond.