

National Operating Policy # 23

Subject: Professional Development Hours - Progressive Compliance Cycle
Approved: February 15, 2019 by the National Executive Council

Objective and Rationale

The objective of this Policy is:

- a) to advise members of the Progressive Compliance Cycle (“PCC”) that will be applied to members who fail to complete Professional Development Hours (“PDHs”) in a manner that complies with the Continuing Professional Competency (“CPC”) Program; and
- b) to support members to achieve their professional development goals and avoid termination of membership.

The Council of Professional Experience (“CoPE”) and the Canadian Institute of Public Health Inspectors (“CIPHI”) recognize there can be many reasons why a member may fail an audit of their PDHs. CIPHI wants members to fully understand the CPC Program requirements and achieve compliance. To support this goal, a 2-year PCC has been developed. The first membership year affected by this Policy will be 2019. This means that members who are audited in 2020 and found not to have met the 2019 PDH requirements will be placed in the first step of the PCC.

Background

Bylaw Requirements

CIPHI Bylaw #1 Section 2.01(a)(iv)(b) states that persons may be eligible for regular membership if they participate in the CPC Program of CoPE. Members must complete Professional Development Hours (“PDHs”) in a manner that complies with the CPC Program in order to maintain a regular membership in CIPHI.

All regular members of CIPHI are reminded each year, and periodically during the year, of the need to submit PDHs via the CIPHI Member Service Centre. CoPE oversees the CPC Program and determines the number of PDHs required.

Enforcement of PDH Requirements

Compliance with the CPC Program has been a requirement of maintaining a regular membership since 2010.

There was no immediate enforcement of this requirement while the CPC Program was in its infancy. A robust PDH audit system is now in place and CIPHI is committed to enforcing mandatory professional development of all its regular members.

Persons failing to fulfill the annual PDH requirements outlined by the CPC Program can avoid termination of their CIPHI membership through participation in the PCC described in this Policy.

Specific Operations

The PCC is initiated when a member fails an audit for one of the following reasons:

1. a member was selected for a random audit of their PDHs for the previous membership year and is found to be in non-compliance; or
2. the year end audit of all regular members indicates a member has entered insufficient number of PDHs for the previous membership year.

1st Audit Fail

A member fails an audit and is placed at Step 1 of the PCC. The member is:

- notified of failure through electronic means and/or registered mail (CoPE/CIPHI Office)
- provided information on how to make application to appeal audit decision (CIPHI Office)
- advised of implications and potential outcomes of continued non-compliance such as termination of membership in CIPHI and suspension of Certificate in Public Health Inspection (Canada) (“CPHI(C)”) credential if certified after January 2017 (CIPHI Office)
- advised of requirements of CPC Program and Regular Membership (CoPE)
- provided information about CPC Program and Professional Development Model (CoPE)
- provided other appropriate assistance requested by candidate in support of achieving future compliance (CoPE)
- moved to Step 2 of the PCC and re-audited the following year for compliance with PDH requirements (CoPE)

Step 2

2nd Audit - Pass

Member is re-audited the year following the first audit fail and they **PASS** the 2nd audit. Member is:

- notified of the audit results – no further action required by CoPE or CIPHI
- subjected to the PCC “Five Year Rule”

2nd Audit - Fail

Member is re-audited the year following the first audit fail and they **FAIL** the second audit.

Member is:

- notified of failure through electronic means and/or registered mail (CoPE/CIPHI Office)
- provided information on how to make application to appeal audit decision (CIPHI Office)
- notified that their audit outcome will be referred to NEC/BOC for further action including termination of membership in CIPHI and suspension of CPHI(C) credential if certified after January 2017 (see CIPHI National Operating Policies (NOP):

Termination and Reinstatement of Membership NOP # 25 and

Suspension and Reinstatement of CPHI(C) Credential NOP # 22

- reminded of requirements of CPC Program and Regular Membership (CoPE)
- re-issued information about CPC Program and Professional Development Model (CoPE)
- subject to the PCC “5 Year Rule”

PROGRESSIVE COMPLIANCE CYCLE

“FIVE YEAR RULE”

This rule applies to all members who have failed an audit of their PDHs

Scenario 1:

If a member fails an audit and at least **five years have elapsed** since they previously failed an audit they may repeat the progressive compliance cycle. This means that they will be placed at Step 1 of the cycle and their membership is not immediately impacted. For example: John last failed an audit in 2020. Since that time he has been compliant with his PDH requirements and maintained membership in CIPHI. However in 2025 John is audited and fails to meet the required PDHs. As it has been 5 years since he last failed an audit he is put at Step 1 of the cycle again and given an opportunity to become compliant with the CPC program. His membership is not affected.

Scenario 2:

If a member fails an audit **within** 5 years of previous failing an audit they are **not** placed at Step 1 of the PCC again. They are considered to still be in the PCC and this counts as a 2nd audit fail.

For example: John last failed an audit in 2020. In 2023 John is audited and again fails to meet the required PDHs. As 5 years has **not** elapsed since his 2020 audit fail this is considered his second audit fail. The 2023 audit fail will be referred to NEC/BOC for further action including termination of membership in CIPHI and suspension of CPHI(C) credential if certified after January 2017. (See CIPHI National Operation Policies (NOP): **Termination and Reinstatement of Membership NOP # 25 and Suspension and Reinstatement of CPHI(C) Credential NOP # 22**

Accountability

Role of National Executive Council

- Ensure this Policy is followed
- Receive notification of audit fails from CoPE
- Take disciplinary action against members after notification of second audit fails

Role of CIPHI Office in PCC

- Manage spreadsheets (all members and their current status and history to ensure the proper flow occurs)
- Communication with members (send letter about failure, send letter about membership suspension, etc.)
- Provide list to CoPE by the first week of February of all members that have not entered required number of PDHs
- Provide statistics on number of members in the PCC, suspended members, etc.
- Process or refer any questions or concerns related to the appeals process and/or progressive compliance model

Role of CoPE in PCC

Complete required audits as per the CoPE PDH Audit Policy and Procedures. This includes:

- Randomly audit a minimum of 5% of regular members
- Audit all members who entered insufficient PDHs as per the list provided by the CIPHI Office
- Provide list of audit failures to the NEC/CIPHI Office for all audit fails by June 1 of each year (for statistical purposes, include whether failure was due to insufficient hours entered or from a random audit of submitted PDHs)
- Refer detailed audit history and information to NEC as required
- Respond to questions or concerns related to the auditing procedure

Attachments / Appendices

Appendix 1: PDH Progressive Compliance Cycle Diagram

Document Change History

Attachment # 1

Process begins when member fails PDH audit for one of the following reasons:

- a) a member is selected for a random audit of their PDH entries of the previous membership year and is found to be non-compliant; or
- b) when year-end audit indicates insufficient PDHs have been entered for the previous membership year.

Any audit fail may be appealed. If appeal is **allowed** there is no further action. If appeal is **dismissed** member is subject to STEP 1

