

## POLICY

## POLITIQUE

### National Operating Policy # 23

*Subject: Professional Development Hours - Progressive Compliance Cycle*  
*Approved: February 15, 2019 by the National Executive Council*  
*Revised: April 2023*

#### *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.

#### *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.

## Specific Operations

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

- a) an audit indicates a member has not met the minimum number of PDHs due to an auditor disallowing a PDH submission **or**
- b) the year-end auto-audit of all regular members indicates a member has entered insufficient number of PDHs for the previous membership year.

There are two steps to the compliance cycle.

### Step 1

A member who fails an audit is placed at Step 1. Members placed at Step 1 are still eligible to hold membership in CIPHI.

The member will remain at Step 1 until:

- a) five years as a CIPHI regular member have elapsed since being placed at Step 1 and they have not failed another audit during those five years. ( See **Appendix 1** “ How to Calculate 5 year Compliance Cycle) At the end of year five they will have completed the progressive compliance cycle and are removed from Step 1, or
- b) they fail another audit within five membership years of being placed at Step 1 and are placed at Step 2

### Mandatory Audits:

When a member is placed at Step 1, **year one** of their five year compliance cycle will be subjected to a mandatory audit by CoPE. A member at Step 1 may also be randomly selected from the pool of regular members for audits in years 2-5 of the cycle in accordance with CoPE audit policies and procedures.

### Step 2

Members at Step 1 who fail another audit within five membership years of being placed at Step 1 will be placed at Step 2.

Members at Step 2 certified prior to January 2017 will be subject to termination of membership in CIPHI.

Members at Step 2 certified after January 2017 will be subject to termination of membership and suspension of Certificate in Public Health Inspection (Canada) credential.

A person will remain at Step 2 until they have applied for and received reinstatement of their membership eligibility as stipulated in **NOP #25 Termination and Reinstatement of Membership**.

Following a successful reinstatement, a member will be placed back at Step 1 and will remain there until:

- a) five years as a CIPHI regular member have elapsed since being placed back at Step 1 and they have not failed another audit during those five years. At the end of year five they will have completed the progressive compliance cycle and are removed from Step 1 **or**
- b) they fail another audit within five membership years of being placed back at Step 1 and are again placed at Step 2.

### *Administrative Roles and Responsibilities*

#### **CoPE**

Role of CoPE in Progressive Compliance Cycle includes:

- complete required audits as per the CoPE PDH Audit Policy and Procedures.
- provide list of audit failures to the 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 an audit of submitted PDHs.)
- refer detailed audit history and information to NEC as required including member fail history within the past five years and number of PDH's required for reinstatement
- respond to questions or concerns related to the auditing procedure
- provide other appropriate assistance requested by candidate in support of achieving future compliance

#### **CIPHI OFFICE**

Role of CIPHI Office in Progressive Compliance Cycle includes:

- Prepare a list by the first week of February of all "auto-failed" members that did not enter the required number of PDHs for the previous membership year.
- Obtain a list of PDH audit results from CoPE by June 1<sup>st</sup>.
- Notify applicable members through electronic means and/or registered mail using the appropriate template approved by the NEC which shall include at a minimum:
  - the Step (1 or 2) of the PCC they have been placed on.
  - how to make an application to appeal the audit decision
  - the members' current eligibility to hold a regular membership in CIPHI (based on their Step placement)
  - the potential for suspension of Certificate in Public Health Inspection (Canada) ("CPHI(C)") credential in the coming year if placed into step 2 of the PCC and if the individual was certified after January 2017 (CIPHI Office)
  - the number of PDHs required for reinstatement and reference to the process for Step 2 members to apply for reinstatement of membership eligibility with a link to [\*\*NOP #25 Termination and Reinstatement of Membership.\*\*](#)
- Provide the NEC with a list of Step 2 members following the conclusion of any appeals
- Manage statistics on behalf of CoPE/NEC 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.

## National Executive Council

Support and advise the CoPE and the office with any issues arising from the implementation of this policy or **NOP #25 Termination and Reinstatement of Membership**.

### *Accountability*

National Executive Council is responsible for the implementation of this policy

### *Attachments / Appendices*

Appendix 1: How to Calculate Five-Year Compliance Cycle: [page 5](#)  
Appendix 2: Progressive Compliance Cycle Flowchart: [page 6](#)

### *Document Change History*

Revised February 17, 2023

## **APPENDIX 1**

### **How to Calculate Years 1-5 of the Five Year Compliance Cycle**

When a member is placed on Step 1 of the PCC Cycle they remain there until they complete 5 membership years and are compliant with the CPC program by submitting the required PDH's in each of those five years.

The membership year that can be counted as year 1 in the cycle can be calculated based on one of the following scenarios. These apply whether the Step 1 placement is due to a first audit failure or the result of a reinstatement from Step 2 back to Step 1.

#### **Scenario A**

A person holds a membership in CIPHI for any portion of the calendar year that they are placed at or returned to Step 1. Provided they are compliant with the annual PDH requirements by Dec 31<sup>st</sup> of the same year then this will be year one of the cycle.

#### **Scenario B**

A person does not hold a membership in CIPHI anytime during the calendar year they are placed at or returned to Step 1. The next year in which they hold membership in CIPHI and are compliant with the annual PDH requirements for that year will be year one of the cycle. For example, they are placed at Step 1 in 2020 but are not a member in 2020. They renew their membership in 2021 and are compliant with PDH requirements for 2021 so 2021 becomes year one of the cycle.

#### **How to Calculate Years 2-5 in the Five-Year Cycle**

Following the first year of the cycle, each year that the person holds a membership in CIPHI and are compliant with the PDH requirements can be counted toward the five-year cycle. For example, if 2020 was the first year of the cycle and membership was continuous for the next five years then the person would finish the cycle on Dec 31<sup>st</sup> 2024.

However, the years do not have to be consecutive. For example, if 2020 was the first year of the cycle but membership was not renewed until 2023 then 2023 would be the second year of the cycle and so on.

**APPENDIX 2  
Progressive Compliance Cycle Flowchart**

