



<b>Health Care Agency Behavioral Health Services Policies and Procedures</b>	Section Name:	Human Resources
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Deputy Director Behavioral Health Services	_____ Signature on File	_____ 5/22/2024

**SUBJECT:** Continuing Education Course Approval for HCA Programs

**PURPOSE:**

This procedure outlines the process to obtain approval from the Health Care Agency (HCA) Behavioral Health Services (BHS) Continuing Education program for offering Continuing Education (CE) or Continuing Medical Education (CME) credits (also known as hours) for learning activities. Continuing Education learning activities update licensed clinicians' knowledge and skills consistent with established accreditation standards. Licensed clinicians are required by their licensing boards to obtain Continuing Education credits to renew their licenses.

**POLICY:**

The Health Care Agency (HCA) Behavioral Health Services (BHS) shall provide Continuing Education for its employees. Behavioral Health Training Services (BHTS) program in Behavioral Health Services shall obtain accreditation by governing boards to provide for these Continuing Education Courses when appropriate.

**SCOPE:**

This Policy and Procedure applies to all HCA programs requesting HCA BHS accreditation approval for Continuing Education courses.

**REFERENCES:**

- [Standards and Criteria for Approval of Sponsors of Continuing Education for Psychologists, August 2015](#)
- [California Association of Marriage and Family Therapists \(CAMFT\) Continuing Education Provider Approval Program Handbook](#)
- [California Medical Association \(CMA\) Accreditation website regarding Continuing Medical Education \(CME\) Requirements](#)
- [California Board of Registered Nursing \(BRN\) Continuing Education for License Renewal](#)

[Orange County Health Care Agency Behavioral Health Services Continuing Education Training Coordinator \(CETC\) Handbook, revised 2024](#) (or subsequent versions)

**FORMS:**

Please contact the Behavioral Health Training Services program at 714-667-5600, or [BHTrainingRequest@ochca.com](mailto:BHTrainingRequest@ochca.com), or visit [Behavioral Health Training Services \(BHTS\) website](#) (County only) for updated copies of these forms:

BHTS Training Request and CE Application

CME Specific Forms:

- Disclosure of Relevant Financial Relationships form for presenters
- Disclosure of Relevant Financial Relationships form for planners and committee members
- Documentation of Verbal Disclosure to Learners

Other forms required when collaborating with other agencies or organizations:

- Joint Providership Agreement
- Letter of Agreement with Ineligible Company

**PROCEDURE:**

- I. The application process, the notification of course approval and the final documentation are outlined in this procedure. The BHTS program is the part of HCA BHS that oversees the accreditation process with various CME/CE approval agencies. As part of the BHTS program, the Continuing Education Coordinator (CEC) will review and ensure CE courses meet or exceed requirements for the education content and satisfies the format required by the State. Below is a listing of available CME and CE accreditations.
  - A. CME credits for Physicians through accreditation by the California Medical Association (CMA).
  - B. CE credits for Psychologists through accreditation by the American Psychological Association (APA).
  - C. CE credits for Licensed Clinical Social Workers (LCSWs), Licensed Marriage Family Therapists (LMFTs), Licensed Professional Clinical Counselors (LPCCs), and Licensed Educational Psychologists (LEPs) through accreditation by the California Association of Marriage and Family Therapists (CAMFT).
  - D. CE credits for Nurses (RNs) through accreditation by the California Board of Registered Nursing (BRN).

- E. CE credits for Alcohol and Other Drug (AOD) Counselors through compliance with California Code of Regulations §13055 of Chapter 8, Division 4, Title 9.

II. Application Process

- A. HCA staff identifies training needs and contacts BHTS to work with the Continuing Education Training Coordinator (CETC) to develop the Continuing Education course to be submitted for approval
- B. The CETC is responsible for gathering the required documents and information with the requestor to complete the BHTS – Training Request and CE Application.
- C. If approval is desired for several available disciplines, such as physicians and psychologists, the BHTS program coordinates the application process.
- D. In planning a Continuing Education course, the CETC should consider all of the following information which may be used to complete an application for continuing education credits.
  - 1. Needs Assessment: There are typically three reasons to offer continuing education activities.
    - a) HCA has a *Demonstrated Needs Assessment* – From QI data, committee studies of care, county data, national trends from national data, professional literature review, US health data.
    - b) HCA staff have *Expressed Needs* – From requests submitted on participants' activity evaluation forms, surveys of potential participants, informal verbal comments, patient problems, consensus.
    - c) HCA has a *Presumed Needs Assessment* – New methods of diagnosis, treatment, or technology, input from experts regarding advances in medical knowledge, regulatory changes affecting patient care.
  - 2. Learning goals for the continuing education activity need to be identified and must relate to the purpose of the program.
    - a) Topics to be covered and methods of instruction.
    - b) Learning goals related to addressing identified needs
    - c) Describe the program:
      - i) Briefly and broadly describe the program (e.g., diagnosing, treating, one illness vs. many, basic science vs. clinical, etc.).

- ii) Pragmatically decide on a format such as lecture discussion, panel, etc. which would facilitate achievement of the learning goals.
- 3. Learning objectives for this learning activity must be measurable.
  - a) Clearly identify behaviors participants can perform to demonstrate their understanding of the material presented and its application
  - b) The objectives need to be written (using words like “identify,” “describe,” “list,” “explain,” “demonstrate”), so that they describe measurable behaviors or outcomes the participant will be able to demonstrate or achieve upon completion of the learning activity.
- 4. Cultural/linguistic issues relevant for this program.
  - a) Demonstrate how cultural/ethnic information/data are used either for demographic overview of the issue or to establish therapeutic relationships, diagnosis/treatment, or enhance clinical care processes. Evidence will need to be provided if cultural or linguistic issues are not relevant.
- 5. Discussion of the effects of implicit bias.
  - a) Implicit bias is defined by California Assembly Bill 241 as, “the attitudes or internalized stereotypes that affect our perceptions, actions, and decisions in an unconscious manner, exists, and often contributes to unequal treatment of people based on race, ethnicity, gender identity, sexual orientation, age, disability, and other characteristics.”
- 6. Evaluation of the effectiveness of each learning activity.
  - a) All training needs to be evaluated by some method related to their effectiveness and relevance to the target audience(s). For CE and CME trainings specific evaluations are to be used and are provided by the BHTS program.
- E. The following items must be submitted together for the review process to start:
  - 1. A BHTS Training Request and CE Application and all supporting documentation are due to the CE Program Coordinator at least sixty (60) calendar days before the course date. The complete application must include the following:
    - a) Clear and concise description of course content and objectives with time estimates.

- b) Current resume of each speaker.
- c) Copies of presentations and handouts.
- d) Financial statement outlining cost and funding for program (for conferences).
- e) Posttest (required for online/enduring materials trainings).
- f) A draft Advertisement or Notice of Course to include:
  - i) Title of the course.
  - ii) Name(s) of presenter(s) and their qualifications and affiliations.
  - iii) Description of the course (including learning objectives).
  - iv) Intended audience.
  - v) A timed agenda which outlines course content in moderate detail and identifies all non-instructional time such as breaks or meals.
  - vi) Course objectives in behavioral terms.
  - vii) Required credit designation statements regarding all relevant CE approval agencies—see section g) below.
  - viii) CMEs can only be advertised after they have been granted. They are never to be advertised as in process, applied for, or any other type of wording.
  - ix) The number of actual training hours of continuing education credit as outlined below.
  - x) Information on requests for Accommodations.  
For example: “Accommodations: If you need disability-related reasonable accommodation or an alternative format for this training event, please contact [BHTS@ochca.com](mailto:BHTS@ochca.com) beforehand.”
  - xi) Grievance Policy  
For example: “For any grievance concerning the Orange County Health Care Agency BHS’s Continuing Education Program, please write to Behavioral Health Training Services at 4000 W. Metropolitan Suite 402 Orange, CA 9288 or call (714) 667-5600.”

xii) Information on when and how CE certificates will be provided to participants.

For example: "Course completion (CE) certificates will be provided immediately at the end of the training in exchange for a completed evaluation."

xiii) A post-test must be used to evaluate participant learning for enduring materials courses such as asynchronous, recorded trainings.

g) Course Accreditation Statement for each accrediting body:

i) The required accreditation statements are specific for each type of CME or CE credits approved according to each approval agency standards. This information will be provided to the requestor to add to flyers/announcements as part of the approval process.

F. Course is planned with another organization (outside of HCA):

1. The CETC needs to obtain an agreement from all agencies involved regarding who is responsible for content, presentation, monitoring, record keeping, advertising, financial arrangements and administrative decisions.
2. In order to enter into a "joint-sponsorship" for a CE activity or "joint-providership" for a CME learning activity, if the other organization is not accredited, then HCA BHS must assume responsibility for the content and planning of the activity.
3. In cases where the other organization is also accredited with the same accrediting body, then an agreement must be made to clarify which of the two organizations shall accept and maintain responsibility for the activity and would be the provider of the credits.

III. Notification of Course Approval

- A. Educational programs offered by HCA BHS are not accredited automatically. Each course offering requires a unique application submitted to the CEC for review and approval.
- B. The CEC or designee shall notify the requestor in writing that the course is approved or if further documentation or information is needed.
- C. The CEC or designee shall provide an approved certificate for distribution to the attendees following completion of an evaluation at the end of the course.
- D. The CEC or designee shall also provide blank attendance sign-in/sign-out registration sheets (if in-person) and evaluation form links.

- E. Courses can be approved for a maximum of one calendar year and may be repeated within that calendar year if the program is identical in content, length, and instructor. The approval may be extended beyond one year if the content of the course is the same, the information is still current, and an approved instructor is facilitating the course.

IV. Final Documentation

- A. After each course, the CETC must submit final documentation to the CEC. The final documentation must include:
  - 1. Course attendance sheets (or user report for virtual trainings) with each participant's name, license type, license number.
  - 2. Completed evaluations.
  - 3. Copy of results of post-test (if applicable, but required for enduring materials/recorded trainings).
  - 4. Disclosure of relevant financial relationships, documentation of verbal disclosure to learners, filled out by CETC who was in attendance.

V. Record Requirements

- A. The CEC must keep the following records for at least four years:
  - 1. Syllabi for all courses.
  - 2. Time and location of courses.
  - 3. Course advertisements.
  - 4. Instructors' vitae or resumes.
  - 5. Attendance rosters with the names of those who attended the course (and license numbers of licensees who completed the course).
  - 6. Sign-in and sign-out sheets (or User Reports for virtual trainings).
  - 7. Documentation of the disclosure of relevant financial relationships (or lack of such relationships) for instructors or anyone in control of course content such as documentation of verbal disclosure to learners filled out by CETC who was in attendance or of information provided to attendees prior to start of training.
- B. The CEC is required to make the records available to accreditation boards if audited.

- C. Audits are on a random basis to ensure compliance with criteria of each accrediting body.
  - D. It is the CEC's responsibility to apply for re-accreditation and to submit all documentation to the accreditation boards prior to the expiration date.
  - E. Accreditation may be approved for varying lengths of time for each type of license.
- VI. CME Committee for the CME Program for physicians
- A. This committee is comprised of physicians and administrators in the Health Care Agency.
    - 1. By design, other Continuing Education Training Coordinators sit on this committee to facilitate coordination between all accreditation functions.
    - 2. Each activity is reviewed by the CME Committee and/or expert content reviewers to ensure activities meet criteria for CME credits.
  - B. The CME committee meets as needed to review the CME Program, and to ensure that all activities approved for CME credits meet the criteria of the California Medical Association (CMA) and the Accreditation Council for Continuing Medical Educations (ACCME).
- VII. APA Committee is the CE Program for psychologists
- A. This committee is comprised of psychologists and other doctorate trained clinicians and administrators within HCA BHS.
  - B. The committee reviews course applications and meets as needed to review the performance of HCA BHS as an approved provider of APA continuing education activities.
- VIII. Other CE Approval Agencies overseen by CEC
- A. The CEC is responsible to ensure trainings meet CE approval guidelines for other approval agencies such as CAMFT and BRN.
  - B. The CEC is responsible for ensuring records are maintained for each training course for which CE credits are provided justifying such approval.
- IX. Commercial support guidelines:
- A. To identify potential conflicts, disclosure forms shall be completed by all people with control over the content of a learning activity such as planners, instructors, and training coordinators. The disclosures will cover all financial relationships that such people have had in the past 24 months with ineligible companies. An



ineligible company is any entity whose primary business is producing, marketing, selling, re-selling, or distributing healthcare products used by or on patients. This is particularly relevant to CME activities.

- B. The disclosure must be made to participants prior to the start of the learning activity. The disclosure may be made verbally or in writing.
  - 1. Disclosures must be made regarding the presenter(s) and anyone having control over the content of the course—such as program planners and committee members.
  - 2. Such disclosures need to be made even in the case in which no one with control over the content or presenter of the course has any relevant financial disclosures with ineligible companies to disclose.
  - 3. Potential conflicts of interest (i.e., relevant financial relationships with ineligible companies) must be resolved prior to the presentation or no CME credits will be approved.
- C. If the speaker is unable to make an unbiased presentation, then continuing education credit is not granted for this presentation, or a different speaker is found for the chosen topic.
- D. Presentation material must be reviewed prior to the presentation. All commercial references would need to be removed.
- E. The CETC shall assure the disclosure of all relevant financial relationships with ineligible companies and any necessary resolution of any conflicts of interest has occurred. The CETC must submit documentation of this at the end of the program using the form, “Disclosure of Relevant Financial Relationships, Documentation of Verbal Disclosure to Learners.”