

CLTAC POSITION PAPER ON CONTINING EDUCATION

The charge to the CLTAC Subcommittee on Continuing Education in January 1997 was to review and make recommendations to update continuing education requirements for all personnel licensed to perform or direct testing under Chapter 3 of the California Business and Professions Code (CBPC). The subcommittee requests CLTAC approval of this position paper which contains the deliberations and recommendations of this subcommittee.

A. PROPOSED CHANGES BY LFS (see Notable Changes for Continuing Education Regulations)

1038 c - Accredited Academic Institution

Recommendation - accept LFS recommendation

1038 e - Approved Provider

Recommendation - change LFS recommendation as follows: "Approved Provider means an accredited academic *institution* offering a semester or quarter unit course, *given for credit*, relevant to the scope of practice of clinical laboratory science, or any person or entity offering continuing education who has been approved by an accrediting agency."

1038 k - New Regulation *re* alternate means obtaining CE credit

Recommendation - Combine with 1038.7 c, but increase fee to \$50 or more to defray review costs by LFS. Change LFS recommendation as follows: "Department Approved Continuing Education Program means a presentation given by an organization that was not approved through an accrediting agency or academic institution, but conforms to the requirements at 1038.3 and the approval was *requested* by an individual licensee for *a specific presentation*."

1038.1 a - 12 contact hours of CE per calendar year

Recommendation - change LFS recommended wording, from "prior to" to "*during*" to clarify when CE to take place. This becomes insignificant if proposed 2 year cycle is accepted.

1038.l b - License renewals and CE

Recommendation - that licensing renewal be changed from an annual cycle to a biennial cycle for all clinical laboratory personnel in order to allow more flexibility in the manner license holders can obtain their continuing education, and minimize the workload for the department. This will also standardize the renewal process. This change can be made under the authority of CBPC 1301.l.

Also, that continuing education contact hours be changed from 12 hours each calendar year, to 24 hours in the 24 months preceding renewal of the license. This will allow more flexibility for the department as well as license holders. This would require a regulatory change per Cindy Lloyd.

1038.1 e - Failure to complete CE results in inactive status

Recommendation - do not assess a fine in lieu of continuing education.

1038.2 b4 - New regulation re determining successful completion CE program

Recommendation - The suggestion by LFS should be strengthened to emphasize that the accrediting agency must define "successful completion" and "successful participant", to the satisfaction of LFS.

1038.2 g - Maintenance of CE records for 5 years

Recommendation - change LFS recommended wording to: The agency ***shall*** also maintain for five years all documentation relative to the approval of providers of continuing education programs. ***This shall include, but is not limited to, the administrative processes approved by the Department for each accrediting agency in accordance with Section 1038.2.***

1038.4 b - Issuance of certificates by approved providers

Recommendation - accept LFS recommendation

1038.4 c - Issuance of certificates by accredited academic institutions

Recommendation - accept LFS recommendation

1038.5 a3C - New regulation re request for waiver/verification good cause

1038.5 a5 - New regulation

Recommendation - combine both sections and number 1038.5 a5

1038.6 - Moving from inactive to active status

Present regulations state "a licensee...shall document 12 hours of continuing education for the year (emphasis added) prior to reinstatement...." Cindy Lloyd states this could be interpreted as the 12 months prior to reinstatement.

Recommendation - that regulation be changed to accommodate the 2-year renewal cycle. If inactive for 12 months or less, 12 contact hours of CE must be obtained; if inactive for more than 12 months, 24 contact hours would be required. Do not assess a fine in lieu of continuing education.

1038.7 c - New regulation regarding fee to be charged for request to approve CE not previously approved by accrediting agency (combine with 1038 k).

Recommendation - Increase LFS recommended fee of \$25 to \$50 to defray cost of review by LFS. Alternate means of obtaining continuing education credit put forth by the National Certification Agency for Clinical Laboratory Science were discussed, but eliminated by the subcommittee as too problematic to administer and would not serve the overall purpose and integrity of the present system of using accrediting agencies to approve providers. Teaching as part of one's employment should not be considered as part of their contact hours for license renewal. ***However, teaching not related to one's employment may be considered as part of their contact hours, subject to LFS approval.***

B. ADDITIONAL CE SUBCOMMITTEE RECOMMENDATIONS

1. CE Requirement for Laboratory Director
 - a. It is recommended that the laboratory director (all categories) be required to obtain 3 hours of approved continuing education on laboratory administration and regulations from approved LFS accrediting agencies. **This would be included as part of the laboratory director's CEU requirement.** A fee should be assessed to administer this program.
 - b. It is also suggested that the department make available to the laboratory directors an annual seminar in current regulatory and laboratory management information which could be used to fulfill the CE requirement.
2. CE Requirement for Other Testing Personnel as defined at CBPC 1206.5
 - a. It is recommended that the laboratory director, as defined at 1209 of the CBPC, be responsible for **verification of** continuing education and training of laboratory testing personnel (licensed and unlicensed), and that they be evaluated during the survey process to assure that this requirement is being met.
 - b. It is recommended that all persons authorized to do testing under 1206.5 obtain CE each year in laboratory focused areas as part of the director's responsibilities in CBPC Subsection 1209.
3. Laboratory Inspection
 - a. It is felt that the inspection itself does not fit the requirement for CE activity. It is suggested that at the discretion of the inspector and the facility, the exit interview could be made into a CE activity if all the CE requirements are met and approved beforehand by an accrediting agency.
4. Signature Requirement
 - a. It is recommended that this requirement be maintained.
5. Section 1038.1 (d) - Auditing for CE Requirement
 - a. It is recommended that this regulation be changed to include an audit of individuals at the discretion of the department. This change would allow the department the authority to audit individuals it deems necessary to verify the validity of the reported continuing education activity.

Subcommittee members: Harold Moore, Chairperson; Barbara Brunell, Sam Chafin, Marsha Eagles, Joan Steiner-Adler, Deanna Iverson, plus Fred Struve, Ex-officio and Dona Lynch, LFS Liaison.

December 2, 1996

Karen Nickel, Ph.D., Chief
Laboratory Field Services
Department of Health Services
2151 Berkeley Way, Annex 12
Berkeley, California 94707-1011

Dear Dr. Nickel:

This letter will confirm our recent conversation relative to appointment of a new Subcommittee of the Clinical Laboratory Technology Advisory Committee (CLTAC). This subcommittee will review and make recommendations on Continuing Education for Laboratory Personnel. I am requesting the following people be appointed to serve on the subcommittee:

Subcommittee on Continuing Education

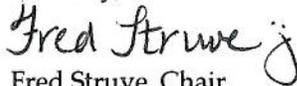
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| LFS Staff Liaison: | Donna Lynch |
| Chair: | Harold Moore, Ph.D.* Samuel Chafin* Marsha Engle-Arcadia Barbara Burnell Don Brown, Watsonville Hospital Joan Steiner, Palm Springs Deanna Iverson* Fred Struve, CLTAC Chair ex-officio |

**Members of CLTAC*

The charge to the subcommittee shall be to review and make recommendations to update continuing education requirements for all personnel licensed or authorized to perform testing under Chapter 3 of the California Business and Professions Code.

Please call me 408-975-1015, ext. 244 if you have questions. I am presently on vacation and will return to my office on December 23.

Sincerely,



Fred Struve, Chair
CLTAC
967 Mabury Road
San Jose, California 95133

cc: CLTAC Membership
Michael Genest
Michael Volz, Ph.D.