

CBPPS Policies

Code of Conduct

CPPS certified professionals have made a commitment to the field of patient safety and the way they conduct themselves reflects on the profession, the specialty, and the healthcare field overall. Compliance with the CBPPS Code of Conduct is critical to the integrity of the CPPS credential and the profession. Violations of the CBPPS Code of Conduct will be reviewed and may result in discipline.

A CPPS professional must:

- Act with integrity, honesty, and respect.
- Communicate openly and listen to understand.
- Accurately and truthfully state credentials, education, and experience.
- Ensure confidentiality of sensitive information.
- Seek out opportunities for continuous improvement and learning.
- Conduct oneself in a manner that reflects positively on the patient safety profession and the CPPS certification.
- Abide by the policies established by the CBPPS.

Appeals

CBPPS will also consider appeals regarding adverse disciplinary decisions.

Appeals should be submitted by email to cpps@ihi.org.

Reconsideration of Adverse Decisions

Applicants who are notified that they do not meet the requirements for eligibility or recertification may request a reconsideration of this decision by sending a written notice to the CBPPS staff within 30 days of communication of the adverse eligibility or recertification decision. The staff will review the applicant's information and will make a final decision. The eligibility or recertification appeal will be reviewed within 45 days of receipt. Written notice from the staff of the final decision will be sent to the new applicant or recertificant within 30 days of the review. The staff may appoint a sub-committee for the purpose of reviewing appeals and making final determinations regarding appeals if needed.

CBPPS will not consider reconsideration requests related to the content of the exam or exam scores. Candidates may request a reconsideration if the exam administration was disrupted, or procedures were not followed.

Disciplinary Policy

To maintain and enhance the credibility of the certification program, CBPPS has adopted the following procedures to allow individuals to bring complaints concerning the conduct of individuals who are candidates or certificants.

In the event an individual candidate or certificant violates the CBPPS Code of Conduct, certification rules, or CBPPS policies, the Board may reprimand or suspend the individual, or may revoke certification.

The grounds for sanctions under these procedures may include, but are not necessarily limited to:

- Violation of the Code of Conduct.
- Violation of established CBPPS policies, rules, and requirements.
- Fraud or misrepresentation in an initial application or renewal application for certification.

Information regarding the complaint process will be available to the public via the CBPPS web site or other published documents. A summary of the policy will be made available to the public.

Actions taken under this policy do not constitute enforcement of the law, although referral to appropriate federal, state/provincial, or local government agencies may be made about the conduct of the candidate or certificant in appropriate situations. Individuals initially bringing complaints are not entitled to any relief or damages by virtue of this process, although they will receive notice of the actions taken.

Complaints

Complaints may be submitted by an individual or entity. Complaints should be reported to CBPPS in writing and should include the name of the person submitting the complaint, the name of the person the complaint is regarding along with other relevant identifying information, a detailed description of factual allegations supporting the suspected violations, citation to the policy or rule involved, and any relevant supporting documentation.

Information submitted during the complaint and investigation process is considered confidential and will be handled in accordance with the Confidentiality Policy. Inquiries or submissions other than complaints may be reviewed and handled by the CBPPS or its staff members at its discretion.

Upon receipt and preliminary review of a complaint involving the certification program, the Director of Certification, in consultation with the Board as needed, may conclude, in their sole discretion, that the submission:

- Contains unreliable or insufficient information, or
- Is patently frivolous or inconsequential.

In such cases, the staff may determine that the submission does not constitute a valid and actionable complaint that would justify bringing it before the Board for investigation and a determination of whether there has been a violation of substantive requirements of the certification process. Preliminary review will be conducted within 30 calendar days of receipt of the complaint.

If a submission is deemed to be a valid and actionable complaint, the Board shall see that written notice is provided to the candidate/certificant whose conduct has been called into question. The candidate/certificant whose conduct is at issue shall also be given the opportunity to respond to the complaint. The Board also shall ensure that the individual submitting the complaint receives notice within 30 days of receipt that the complaint is being reviewed by the Board.

Complaint Review

For each complaint that is a valid and actionable complaint, the CBPPS authorizes an investigation into its specific facts or circumstances to whatever extent is necessary in order to clarify, expand, or corroborate the information provided by the submitter.

The Chair of the Board appoints a Review Committee of three or more individuals, who may or may not be members of the Board to investigate and make an appropriate determination with respect to each such valid and actionable complaint; the Review Committee may review one or more such complaints as determined by the Chair. The Review Committee initially determines whether it is appropriate to review the complaint under these procedures or whether the matter should be referred to another entity engaged in the administration of law. The timeline for responses and for providing any additional information shall be established by the Review Committee. The review and investigation will be completed in an appropriate amount of time, not to exceed six months, unless there are extenuating circumstances that require an extended time period. The Review Committee may be assisted in the conduct of its investigation by other members of the CBPPS Board, staff or legal counsel.

The Chair exercises general supervision over all investigations. No one with any personal involvement or conflict of interest may serve on the Appeal Committee.

Both the individual submitting the complaint the candidate/certificant who is the subject of the investigation (or their employer) may be contacted for additional information with respect to the complaint. The Review Committee, or the Board on its behalf, may at its discretion contact such other individuals who may have knowledge of the facts and circumstances surrounding the complaint.

All investigations and deliberations of the Review Committee and the Board are conducted in confidence, with all written communications sealed and marked "Personal and Confidential," and they are conducted objectively, without any indication of prejudgment. An investigation may be directed toward any aspect of a complaint which is relevant or potentially relevant. Formal hearings are not held and the parties are not expected to be represented by counsel, although the Review Committee and the Board may consult their own counsel.

Members of the Review Committee shall be reimbursed for reasonable and preapproved expenses incurred in connection with the activities of the Committee.

Determination of Violation

Upon completion of an investigation, the Review Committee recommends whether the Board should make a determination that there has been a violation of CBPPS policies and rules. When the Review Committee recommends that the Board find a violation, the Review Committee recommends imposition of an appropriate sanction. If the Review Committee so recommends, a proposed determination with a proposed sanction is prepared under the supervision of the Chair and is presented by a representative of the Review Committee to the Board along with the record of the Review Committee's investigation.

If the Review Committee recommends against a determination that a violation has occurred, the complaint is dismissed with notice to the candidate/certificant, the candidate/certificant's employer, and the individual or entity who submitted the complaint; a summary report is also made to the Board.

If the Review Committee recommends for a determination that a violation has occurred, the Board reviews the recommendation of the Review Committee based upon the record of the investigation. The Board may accept, reject, or modify the Review Committee's recommendation, either with respect to the

determination of the violation or the recommended sanction to be imposed. If the Board makes a determination that a violation has occurred, this determination and the imposition of a sanction are promulgated by written notice to the candidate/certificant.

In certain circumstances, the Board may consider a recommendation from the Review Committee that the candidate/certificant who has violated the certification program policies or rules should be offered an opportunity to submit a written assurance that the conduct in question has been terminated and will not recur. The decision of the Review Committee to make such a recommendation and of the Board to accept it are within their respective discretionary powers. If such an offer is extended, the candidate/certificant at issue must submit the required written assurance within thirty days of receipt of the offer, and the assurance must be submitted in terms that are acceptable to the Board.

Sanctions

Any of the following sanctions may be imposed by the Board upon a candidate/certificant whom the Board has determined to have violated the policies and rules of its certification program(s), although the sanction applied must reasonably relate to the nature and severity of the violation, focusing on reformation of the conduct of the member and deterrence of similar conduct by others:

- Written reprimand to the candidate/certificant
- Suspension of the certificant for a designated period; or
- Suspension of the candidate's application eligibility for a designated period; or
- Termination of the certificant's certification from the Board; or
- Termination of the candidate's application eligibility for a designated period.

For sanctions that include suspension or termination, a summary of the final determination and the sanction with the candidate/certificant's name and date is published by the Board and CBPPS.

Certificants who have been terminated shall have their certification revoked and may not be considered for certification in the future. If certification is revoked,

any and all certificates or other materials requested by the Board must be returned promptly to the Board.

Appeal

Within thirty (30) days from receipt of notice of a determination by the Board that a candidate/certificant violated the certification program policies and/or rules, the affected candidate/certificant may submit to the Board in writing a request for an appeal.

Upon receipt of a request for appeal, the Chair of the Board establishes an appellate body consisting of at least three, but not more than five, individuals. The majority of members should hold a current certification. One member may not be a certificant holder. This Appeal Committee may review one or more appeals, upon request of the Chair. No current members of the Review Committee or the Board may serve on the Appeal Committee; further, no one with any personal involvement or conflict of interest may serve on the Appeal Committee. Appeal committee members must not be involved in the original decision.

Members of the Appeal Committee may be reimbursed for reasonable and preapproved expenses incurred in connection with the activities of the committee.

The Appeal Committee may only review whether the determination by the Board of a violation of the certification program policies and/or rules was inappropriate because of material errors of fact, or failure of the Review Committee or the Board to conform to published criteria, policies, or procedures.

Only facts and conditions up to and including the time of the Board's determination as represented by facts known to the Board are considered during an appeal. The appeal shall not include a hearing or any similar trial-type proceeding. The Board and Appeal Committee may consult legal counsel.

The Appeal Committee conducts and completes the appeal within ninety days after receipt of request for an appeal. Written appellate submissions and any reply submissions may be made by authorized representatives of the member and of the Board. Submissions are made according to whatever schedule is reasonably established by the Appeal Committee. The decision of the Appeal Committee either affirms or overrules the determination of the Board but does not address a sanction imposed by the Board.

The Appeal Committee decision is binding upon the Board, the candidate/certificant who is subject to the termination, and all other persons.

Resignation

If a certificant who is the subject of a complaint voluntarily surrenders their certification at any time during the pendency of a complaint under these Procedures, the complaint is dismissed without any further action by the Review Committee, the Board, or an Appeal Committee established after an appeal. The entire record is sealed, and the individual may not reapply for certification by the CBPPS. However, the Board may authorize the Chair to communicate the fact and date of resignation, and the fact and general nature of the complaint, which was pending at the time of the resignation, if requested by a government entity engaged in the administration of law, or as required to disclose in legal proceedings if subpoenaed.