CONTINUING EDUCATION APPROVER UNIT

Administrative Section of the Approved Provider Unit Criteria Manual

November 2009
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INTRODUCTION

The Illinois Nurses Association (INA) is accredited as an approver of continuing nursing education by the American Nurses Credentialing Center’s Commission on Accreditation (ANCC COA).

Approved provider unit status is recognition by INA of an agency or organization’s capacity to award contact hours for continuing nursing education activities, planned, implemented and evaluated by the organization. Approved Providers provide continuing nursing education (CNE) activities and cannot approve their own or another organization’s activities. The provider unit should establish a plan regarding how it will handle inquiries if approval is requested. As an approved provider, the unit ensures that there is adherence to the INA/ANCC criteria for the activities it provides.

Provider Approval is based on an in-depth analysis of the quality of several continuing education activities to estimate the likelihood of an agency or organization's ability to continue to plan, implement and evaluate continuing education activities over a period of three years.

Once provider approval is granted, the agency or organization must maintain a continuing education system that adheres to the criteria of INA/ANCC COA. Please note that provider approval and single activity approval are two different types of recognition.

ELIGIBILITY CRITERIA FOR APPROVED PROVIDER UNIT STATUS

(i) A provider is ineligible for approval if it is a commercial interest which is defined as an entity that produces, markets, sells or distributes healthcare goods or services consumed by or used on patients or that is owned or controlled by an entity that does the same. This definition allows a provider to have a sister company that is a commercial interest as long as the provider has and maintains adequate corporate firewalls to prohibit any influence or control by the sister company over the CNE program of the provider. In this case ANCC would expect the provider would have an adequate corporate firewall in place to prohibit any influence or control by the sister company over the CNE program.

(ii) Organizations that targeted more than 50% of their educational activities (including internet) provided in the previous calendar year to nurses in multiple regions (use the DHHS regions: www.hhs.gov/about/reions/) must apply for reaccreditation to the national accrediting body – ANCC Accreditation Program. Organizations that targeted 50% or less of their activities (including internet) provided in the previous calendar year to nurses in multiple regions or any number of activities in a single state or region (or a state contiguous to that region) may apply to the INA Continuing Education Approver Unit (CEAU) for approval as provider units.

(iii) There is a lead designated nurse planner who is involved in all aspects of the provider unit. This nurse planner is a registered nurse, possesses a minimum of baccalaureate degree in nursing and has experience in the field of education or adult learning.

(iv) The provider unit is administratively and operationally responsible for coordinating all aspects of the continuing nursing education (CNE) activities.

(v) An agency or organization seeking approved provider unit status must have attained approval from an ANCC-accredited approver, such as INA, for three (3) individual educational activities within the last 12 months. This does not include co-provided activities for first time applicants.
ESTABLISHMENT AS A PROVIDER UNIT

Provider unit authority: The provider unit must be administratively and operationally responsible for coordinating all aspects of the continuing nursing education activities provided by the organization. A provider unit may be either:

a) a single-focused organization\(^1\) devoted to offering continuing nursing education (CNE); or

b) a distinct, separately identified unit within a complex, multi-focused organization\(^2\).

For example, the provider unit may be a continuing nursing education division, a staff development department or a nursing education committee within a larger organization. Provider Units within complex organizations must demonstrate their autonomy for providing continuing nursing education in the written documentation that they submit. In other words, the provider unit (not the larger organization) must be administratively and operationally responsible for coordinating all aspects of the continuing nursing education activities.

\(^1\)The single-focused organization exists for the single purpose of providing education.

\(^2\)The multi-focused organization exists for more than the purpose of providing education.

DESIGNATED NURSE PLANNER(S):

The provider unit must have the services of at least one nurse planner who is responsible for adhering to INA/ANCC criteria in the provision of continuing nursing education. Nurse planners may work for the provider unit as staff members, consultants or volunteers.

The nurse planner must:

- be a registered nurse (RN) with at least a baccalaureate degree in nursing.
- have education or experience in the field of education or adult learning.
- demonstrate competence in performing successfully at the expected level. An accepted demonstration of competence is evaluated by the review of the nurse planner’s biographical data or resume.

Lead Nurse Planner: If there is more than one nurse planner, one of them must be selected and identified as the lead nurse planner with overall responsibility for assessing needs, planning, implementing and evaluating continuing nursing education activities. The lead nurse planner is also responsible for assuring that all nurse planners are appropriately prepared, oriented and trained to meet the INA/ANCC criteria.

The essential role of the nurse planner is twofold:

- To ensure that a qualified registered nurse is involved in the entire process of delivery - from inception through evaluation and follow-up - for each continuing nursing education activity offered by a provider unit.
• To guarantee that INA/ANCC criteria guide the development and implementation of each CNE activity offered by a provider unit.

Large providing organizations often need to use multiple nurse planners, each of whom may be functioning under a unique arrangement within the provider unit.

**Note:**
(i) The lead nurse planner must sign an INA attestation statement, in the application, agreeing to adhere to the criteria and operational requirements. INA must always be provided with an up-to-date list of the designated nurse planners in the approved provider unit.

**Non-Nurse planners:** Other nurses may serve on a planning team with one of the designated nurse planners. These other nurses may not have the same responsibilities or educational requirements as the nurse planners. They are only responsible for participating infrequently in the planning of particular educational events.

**ORIENTATION FOR NEW NURSE PLANNERS:** A thorough orientation, which includes studying the contents of this instruction manual and the operational procedures of the provider unit, must be provided to each new designated nurse planner by the lead nurse planner.

**POLICIES**

**PROVIDER UNIT APPLICATION SUBMISSION DATE:**
In order to take full advantage of the continuing education review process, provider unit applications should be received at the INA Chicago Office at least three (3) months prior to the date on which the organization would like the provider status to take effect. **No retroactive recognition will be granted by INA.**

Review panels composed of your nursing peers review continuing nursing education applications. These panels are voluntary in nature.

**FEES:**
There is a fee for review of approved provider unit applications. Please refer to the fee schedule on the continuing education pages of the INA Website. The fee is used to defray part of the expenses incurred in administering the program. A fee of $25.00 will be assessed for a check returned from the bank for any reason.
METHOD OF PAYMENT: Payment, which must be submitted with the application, may be made by credit card (American Express, MasterCard or Visa only) or check or money order.

WITHDRAWAL OF AN APPLICATION: If a provider unit application is withdrawn within two days of receipt of the application, a non-refundable $100.00 processing fee would apply. If a provider unit application is withdrawn within five days of receipt of the application, a non-refundable $350.00 processing fee will apply. After five days, there will be no refunds.

LENGTH OF APPROVAL: Approved provider unit status is valid for three years from the date of approval by the INA Continuing Education Approver Unit (CEAU). Note: Once the approved provider unit status ends, INA’s recognition will not cover any educational activities planned and presented after the date of expiration.

CHANGES TO THE PROVIDER UNIT: INA must be informed, in writing, within thirty (30) days of any organizational/provider unit changes such as to the name, ownership or structure and primary/lead and other designated nurse planners of the provider unit in place at the time of approval. The following must be submitted for new nurse planners:

a) completed New Nurse Planner form. This form is available upon request.

b) First Time/Renewal of Status and Nurse Planner Update Biographical Data form (available on the INA Website)

c) Any new lead designated nurse planner(s) must submit a signed INA attestation statement agreeing to adhere to the criteria and operational requirements. This form is available upon request.

COMMUNICATION WITH INA: Approved provider units must maintain timely communication with INA by providing, at a minimum, reports of data requested by INA within the time frame specified and information about termination of approved provider activities within thirty (30) days of the decision to terminate.

PUBLICATION POLICY: The Illinois Nurse and CHART, Journal of Illinois Nursing are published on a staggered basis annually if deadline and space permit. Approved provider units that want their educational activities to be included in the publications, should submit the title(s), date(s), contact hours and location(s) at least 90 to 120 days prior to the first presentation date. This is a free service included with the application fee.
WEBSITE: Approved provider units may submit the title(s), date(s), contact hours, name(s) of contact person(s) and location(s) of upcoming activities to INA which will be included in the list of approved educational offerings on the INA Website.

COPYRIGHTED MATERIALS: If copyrighted materials will be used as learning/teaching materials written permission must be obtained prior to distribution to the learners. This documentation must be maintained in the approved provider unit’s files.

CO-SIGNING OF COMMERCIAL SUPPORT AGREEMENTS: As the approver unit, INA cannot co-sign commercial support agreements.

SITE VISITS: INA, as the approval body, reserves the right to conduct site visits on an as needed basis prior to or post approval.

PERIOD OF RECORD STORAGE: Continuing nursing education records must be stored in a secure, confidential and retrievable manner for six (6) years. Please refer to the record keeping system section in the Provider Unit’s Main Documentation form for an Educational Activity for the list of records that are required to be stored.

RENEWAL OF PROVIDER UNIT STATUS: Once the approved provider unit status has expired, the provider unit approval application must be resubmitted as a new application.

There is no special procedure for renewals.
CONTENTS OF THE APPROVED PROVIDER UNIT APPLICATION

The following must be submitted in triplicate:

1. **Part I: Administrative Criteria**
   All of the required information does not have to be typed on the administrative criteria section of the application form. However, page numbers indicating the location of the information on attached documents, the name(s) of the lead and other designated nurse planner/s, the name(s) of other provider unit personnel, if applicable, and the multiple-choice questions must be completed on this form.

2. **Part II: Educational Design Criteria** – Please refer to the requirements on page 13.

3. **Organization of the educational activities:** To facilitate INA’s peer review, the same documents should be placed together for each activity. For example, pages pertaining to a CNE activity’s Main Documentation form, Activity Planners’ and Presenters’ Biographical Data forms, Conflict of Interest forms, etc.

4. Attachments such as policies and procedures, etc. should be organized in alphabetized or numerical index tabs.

5. Table of contents that identifies all the submitted materials with section titles and page numbers

KEY POINTS TO REMEMBER WHEN COMPLETING THE APPROVED PROVIDER UNIT APPLICATION

1. All of the criteria in this INA Administrative Approved Provider Criteria Manual must be read thoroughly.

2. All materials must be typed or computer-generated.

3. Additional data that are not required in the criteria should not be submitted. For example, teaching materials, handouts or the layout of the physical facilities.

4. If binders are to be used to submit the application, they must be bound in light weight and not heavy weight binders.

   Reminder: Three copies of the application must be submitted.

Please review the **glossary of terms** for familiarization with the terminology of this continuing nursing education system.
PART I: ADMINISTRATIVE CRITERIA

Criterion I. Mission Statement (Beliefs and Goals)
Please refer to the Approved Provider Unit Application form for the requirements pertaining to mission statement.

Criterion II: Unit Operations
• Please review the articles on the following pages entitled “Healthcare System Provider Units”, “The Role of an Approved Provider Unit” and “Basic Operational Procedures for Educational Activities of a Provider Unit”.
• Please refer to the Approved Provider Unit Application form for the requirements pertaining to unit operations.

Healthcare System Provider Units

• If the provider unit is a healthcare system, the operational procedures’ documentation must include a description of how the planning will be conducted by a central group or committee.

• A portion of a healthcare system may apply for recognition as an approved provider if there is compliance with the following requirements:
  i. The name of the provider unit, throughout the entire application to INA, must clearly reflect that the status only applies to the specific agencies or facilities that the status will affect in the healthcare system.
  ii. Identify the particular agencies or facilities within the healthcare system that the status will affect.
  iii. There must be a centralized planning system with a lead nurse planner who is involved with and accountable for the entire provider unit. Note: There may be as many designated nurse planners (RNs with baccalaureate or higher degrees in nursing) as needed; however, there must be a lead nurse planner with overall responsibility.
  iv. It must be addressed in the administrative section of the provider unit application that the other agencies or facilities within the healthcare system can only function as co-providers with the provider unit as they will not be covered by the status.
The Role of a Provider Unit

Provider units must not function as approver units per the American Nurses Credentialing Center’s Commission on Accreditation (ANCC COA). The focus of a provider unit is to develop/plan, implement and evaluate educational activities as it has been granted a three-year blanket approval status. The emphasis should not be on reviewing and approving which is the role of INA as an approver unit. Approver Units such as INA, i.e., state nurses associations, specialty nursing organizations, federal nursing services and national nursing organizations based outside the borders of the United States are the only organizations authorized to function as approvers by the ANCC COA within this system of CNE.

Please review the following scenarios:

Key:
Lake Geneva Hospital (LGH) is an approved provider unit
Disney University College of Nursing (DU CON) is not an approved provider unit

WRONG SCENARIOS FOR PROVIDER UNITS

In-House Situation
- LGH is a provider unit. The RNs in the Cardiology Department ask the provider unit to offer a CNE activity.
- A designated nurse planner for the unit directs one of the Cardiology Department RNs to complete the Approved Provider Activity Documentation forms which are reviewed for adherence to the criteria and then approved for nursing contact hours. The RNs of the Cardiology Department are provided with an approval number and the approval statement for the certificates.
- A representative/designee of the LGH provider unit is not present when the event occurs.

Co-providership Situation
- The LGH provider unit is approached by DU CON to co-provide an educational activity.
- A designated nurse planner sends the Approved Provider Activity Documentation forms to the representative at DU CON, who completes and submits them to the nurse planner.
- The provider unit reviews the forms for adherence to the criteria and then sends DU CON a letter of approval with an approval number and the approval statement for the certificates.
- A representative/designee of LGH provider unit is not present when the event occurs.

CORRECT SCENARIOS FOR PROVIDER UNITS

In House Situation
- RNs in the NICU Department ask the provider unit to offer a CNE activity.
- Mary Jingles, a designated nurse planner for the provider unit, meets with two RNs of the NICU Department to develop the purpose/objectives/content, select the presenters and address the activity’s logistics, after determining that the topic area meets the definition of continuing nursing education. Mary, as a nurse planner, will explain the CNE criteria during the planning process which includes completion of the forms.
- A representative of the LGH provider unit is present at the event to ensure adherence to the criteria.
Co-providership Situation

- The LGH provider unit is approached by DU CON about co-providing a CNE activity.
- The LGH provider unit determines that jointly offering this activity with DU CON meets its standards and policies for partnering with other organizations and would be beneficial.
- It informs DU CON that, as the approved provider unit, it would have primary and overall responsibility for providing the activity and an agreement would have to be signed to this effect.
- The LGH provider unit also explains to DU CON that the relationship would be that of two organizations working together to provide a CNE activity and not that of an approver unit and an applicant organization.
- Jane Smith, one of the designated nurse planners for the provider unit, plans the activity with DU CON representatives, which involves meeting in person and by phone to develop the purpose/objectives/content, selecting the presenters and addressing the activity’s logistics. The nurse planner will explain the CNE criteria during the planning process which includes completion of the forms.
- A representative of the LGH provider unit is present at the event to ensure adherence to the criteria.
BASIC OPERATIONAL PROCEDURES
FOR EDUCATIONAL ACTIVITIES OF A PROVIDER UNIT

Provider Units plan, implement and evaluate nursing education activities. They may not approve their own or another organization’s activities. The work of planning, implementing and evaluating each educational activity is guided by the designated nurse planner(s) and carried out by that individual in cooperation with at least one other planner who does not have to be a registered nurse.

Use of wording

- The word, “approval” should not be used when planning, documenting or offering nursing contact hours within a provider unit as INA has already granted the blanket approval for a three-year period to the organization and the sole focus of the unit is to provide continuing nursing education (CNE) activities.
- When referring to a CNE activity’s forms, the word, “application” must not be used. Wording such as “CNE Activity Main Documentation Form” or “CNE Activity Main Planning Form” may be used.

These guidelines should be followed for each educational activity.

Prior to the presentation

1. Once the status as an approved provider unit has been granted by INA, the lead nurse planner informs RNs that all requests for nursing CNE credits within the organization must be made to him/her.
2. When a request is made within the provider unit’s organization for a CNE activity to be offered for nursing contact hours, the designated nurse planner(s) first of all determines that the topic area(s) to be presented meets the definition of continuing nursing education.
   Note: Approved provider units must not distribute the approved provider forms to other organizations that are requiring recognition for nursing contact hours (individual activity approval). In such situations, the provider unit must direct these organizations to INA for the appropriate application materials.
3. A designated nurse planner and at least one other planner meets with the interested parties, who may be selected to serve as planners, to discuss the CNE requirements, e.g., purpose/learning goal, learner objectives, content and potential presenters/content specialists. Note: Other nurses may serve on a CNE activity’s planning committee along with one of the designated nurse planners. These other nurses do not have the same responsibilities, accountabilities or educational requirements as the designated nurse planners. They are only responsible for participating in the planning of one particular educational event.
4. An individual who is directly involved with the planning is assigned to complete the documentation required by INA. Note: Completion of the documentation forms is ultimately the responsibility of a designated nurse planner.
5. A designated nurse planner reviews the documentation to ensure that it meets all the educational design criteria in this instruction manual.
6. Once the lead nurse planner has ascertained that the documentation and activity’s logistics adhere to the criteria, he or she will assign the approval number granted by INA. Note: Retroactive assignment of contact hours to a CNE activity is not allowed in this system of continuing nursing education.
7. The records must be stored in accordance with the description of record keeping procedures submitted to INA.

8. Co-providership
When the provider unit is working together with another organization to plan and present an activity, a designated nurse planner must be the person responsible for assuring that the educational design criteria as provided by INA are used to plan and implement the activity.

When co-providing an educational activity, tasks involved in planning, implementing, and evaluating the activity may be shared; however, the final responsibility and accountability to ensure that the criteria are met, remains with the approved provider unit. A written co-providership agreement must confirm these arrangements.

Note:
(i) Co-providership does not mean that the provider unit is granting approval for nursing contact hours to another organization.
(ii) If two or more approved provider units co-provide (work together), one of the approved providers must take primary responsibility for the key elements listed in the Approved Provider Unit Main Documentation Form for an Activity. The co-providership agreement must clearly specify which approved provider will assume this responsibility.

During the presentation
A representative or designee of the provider unit must be present during the presentation to carry out the following duties:
- Make the disclosure regarding the planners’ and presenters’ absence or presence of conflict of interest in accordance with the selection made in the Approved Provider’s Main Documentation form for an Activity.
- Announce the criteria for verifying participation and successful completion and ensure that they are adhered to.
- Supervise the distribution of certificates.

Post presentation
A designated nurse planner must organize the compilation/summation of the participants’ feedback on the evaluation forms and follow-up with the learners, speakers and other individuals identified as being involved with the activity in the main documentation form.
Criterion III. Provider Unit Evaluation:
Please refer to the Administrative Application form for the requirements pertaining to provider unit evaluation.

PART II: EDUCATIONAL DESIGN CRITERION

IV. Educational Design:
The provider unit has a clearly defined process for assessing need, planning, implementing and evaluating continuing nursing education. Continuing nursing education activities are assessed, designed, planned, implemented and evaluated in accordance with adult learning principles and professional education standards and ethics. The educational design process includes procedures for protecting educational content from bias, providing learners with appropriate information and documentation related to their participation and maintaining records in a secure and confidential manner.

Required evidence to be submitted:
1. The following are required
   First time applicants:
   a) Approval letters from the INA Continuing Education Approver Unit or another ANCC-accredited approver for three educational activities approved within the last 12 months.
   b) The summative evaluation for each activity.
   c) Documentation for an educational activity (for a minimum of one hour or a maximum of three hours) that has been planned and will be presented after approved provider unit status has been achieved. The forms designated to provider units’ educational activities must be completed. All required forms must be submitted. The advertising/promotional material and certificate must list the official provider unit approval statement that will be used.
      Note: Please contact the INA CEAU for the appropriate forms.

   Renewal of status applicants: Documentation for three different educational activities planned and presented within the last three years of approved provider unit status. Each activity should be for a minimum of one hour or a maximum of three hours and reflect the criteria that are in effect at the time of the application submission. The three sample activities must be representative of the types of educational activities that are usually provided.
   2. Renewal of status applicants: List of all the educational activities provided during the most recent period of approval. The list must include the title, date(s), contact hours and the number of nurses that attended each activity. Note: This does not apply to first time applicants.

Educational Design Section of the Approved Provider Instruction Manual (Separate Document)
Renewal of status and First time applicants: must use the Educational Design Approved Provider Instruction Manual, which is a separate document, to provide the required documentation referred to above in # 1 and # 2. Note: Item number 2 does not apply to first-time applicants.
**ACTIONS TAKEN AFTER THE PEER REVIEW**

Following the review by a Continuing Education Provider Unit Peer Review Panel, a provider unit application is Approved, Deferred or Disapproved.

**APPROVED:** If Approved, the organization that has applied for approved provider unit status will receive a letter of notification, which includes instructions and the approval number.

**DEFERRED:** If Deferred, the organization will receive specific instructions on how to meet the criteria for approval. The revised/additional materials may not have to be returned to a provider unit review panel but will be evaluated by a reviewer or continuing education approver unit (CEAU) staff. **Note:** The revisions or additional materials must be submitted no later than **sixty calendar days** from the date on the letter of deferral.

**DISAPPROVAL**

**RECONSIDERATION:** If your provider unit application is disapproved you may also request reconsideration. Reconsideration is a process that allows the applicant to obtain reconsideration of an adverse decision on a provider unit application by a submission of clarifying materials to the original decision-making body. A letter requesting reconsideration must be sent to the INA CEAU within 30 calendar days of notification of the disapproval. Within 30 calendar days after INA has received the request for reconsideration, a written reply will be sent to the provider.

**APPEAL PROCESS:** If your provider unit application is disapproved, you may appeal the decision by requesting the Appeals Committee reviews the provider unit application as it was originally submitted. A letter requesting such an appeal must be sent to the Appeals Committee within 30 calendar days after the letter of disapproval was sent by INA. The decision of the Appeals Committee is final.

**RESUBMISSION:** The provider of a disapproved provider unit application that does not choose the reconsideration or appeal process may submit additional information and use the recommendations of the review panel to strengthen the application. The application can then be resubmitted as a new application at the regular fee.
REVOCATION OF CONTINUING EDUCATION CREDIT:

Under circumstances where the INA CEAU has reasonable grounds to believe that information has been falsified or misrepresented on an application, or there is a lack of compliance with the criteria, the INA CEAU may disapprove the application or revoke the approval if approval has already been granted.

The duly appointed group of the Commission on Continuing Education will follow the following procedure in revocation considerations:

1. Identification of the criteria that the providing organization has violated;
2. Request that the providing organization appears at a revocation hearing to clarify, amplify, and/or verify the questionable material;
3. Determine after Steps 1 and 2 if grounds exist for revocation using the INA Continuing Education Approver Unit standards and criteria;
4. Decide for or against revocation; delineates any stipulations for continued approval;
5. Inform the providing organization as soon as possible of the decision;
6. The decision of the Revocation Body will be final. Approval may be revoked if the providing organization refuses to comply with an investigation or the providing organization refuses to comply with stipulations for continued approval.
7. Revocation is effective on the date of the letter of notification. All statements regarding the approval status must be removed from publicity materials and certificates.