Policies Governing the Consideration of Requests for Exceptions to Policy

Purpose. The policies governing NCCPA certification and other credentialing programs exist to protect the integrity of the certification and credentialing process. Policies are thoughtfully developed and fairly applied. Nevertheless, recognizing that severe extenuating circumstances can sometimes preclude compliance with certain NCCPA requirements, NCCPA affords PAs in such circumstances the opportunity to submit Exception to Policy ("ETP") requests.

Submission Criteria. To be considered, ETP requests must meet all applicable submission criteria as published on NCCPA's website. Submission criteria address documentation requirements and timeliness.

Other Limitations. Certain NCCPA policies are outside the scope of the ETP review process, and requests for exceptions to those policies will not be considered. Further, NCCPA will not grant ETP requests if the requested exception poses a risk to the public, jeopardizes the integrity of NCCPA exams, is inconsistent with NCCPA's mission, or if granting the request would subject NCCPA to unreasonable expense and burden.

The ETP process is not the means through which PAs should seek remedy for incidents occurring *during* the administration of an exam. Such exam-related grievances must be submitted in accordance with procedures published on NCCPA's website.

Communication Requirements. NCCPA communicates directly with PAs and, if applicable, their legal counsel. With a written, signed, and notarized request or pursuant to a properly scoped Power of Attorney or legal guardianship document, a PA can authorize a non-attorney representative to communicate with NCCPA on the PA's behalf. In the absence of a Power of Attorney or legal guardianship, the PA's signed and notarized request to appoint a non-attorney representative must present extenuating circumstances that warrant departure from NCCPA's rule requiring the PA himself or herself to communicate with NCCPA.

Guidance to Those Seeking an Exception to Policy.

In accordance with its Policies Governing the Considerations of Requests for Exception to Policy ("ETP"), NCCPA reviews ETP requests that pertain to a PA's inability to comply with an NCCPA certification requirement, within the specified timeframe, due to severe, extenuating circumstances.

Examples of certification requirements include:
- Passing an NCCPA exam within the required time period
- Earning CME credits
- Logging CME credits
- Submitting required fees
- Complying with a CME audit
- Meeting other administrative requirements

Eligible Extenuating Circumstances

Examples of extenuating circumstances may include:
- Personal medical issues
- Family medical issues
- A death in the family
- Legal or personal issues
- Inclement weather
- Military deployment outside of the United States
- Technical difficulties related to NCCPA system issues
- NCCPA error

The severity and, if applicable, duration of the extenuating circumstance are important factors in NCCPA's consideration of ETP requests.

Non-Eligible Circumstances
Circumstances that do not qualify as extenuating include, but are not limited to:
- Financial hardship unless related to an extenuating circumstance
- Not receiving NCCPA correspondence due to PA's failure to notify NCCPA of a name, email or address change
- Forgetting to complete requirements by required timeframe
- Going on vacation
- Normal life events (working, moving, getting married, etc.)
- Ill relative for whom the PA does not serve as a primary or secondary caregiver
- Volunteering, nearing retirement, or having maintained certification for many years
- Technical difficulties related to a PA's system or user error (e.g. internet connection, outdated browser, forgotten username or password)
- Exemption from a CME audit due to retirement, if NCCPA was not notified of the PA's retirement date

Certification Requirements for which ETP Requests May Be Considered

Examples of NCCPA requirements for which a PA may submit an ETP request include:

1. General Requests
   - Fee waivers or refunds (Exam fee refunds will exclude the non-refundable fees associated with reserving your seat)
   - 90-day wait between attempts at PANCE or PANRE
   - Inability to take PANCE during the required timeframes (Extension of initial eligibility – Exhaustion of 6 years and/or 6 attempts)
   - Inability to take PANRE during the required timeframes (Extension of timeframe to recertify – 6th or 10th year)
   - Inability to pass PANCE or PANRE during the required timeframe due to an extenuating circumstance

- Filing an exam grievance outside of the required three (3) business day timeframe (qualifies for ETP review ONLY when an extenuating circumstance prevented compliance with the three (3) business day grievance policy).
- Inability to earn or to log CME credits during the required timeframes (Extension of timeframe for current cycle)
- Requests for extension of CME audit timeframes

PAs must pay careful attention preparing for and scheduling an NCCPA exam within the policy deadlines. Requests for additional exam attempts above and beyond the standards communicated in the PANCE and PANRE policies are approved only in rare circumstances. In addition, that a PA has not used up his or her maximum exam attempts within the required timeframe or cannot schedule remaining exam attempts in the final year of eligibility because of the 90-day waiting period is not a sufficient basis for granting ETP requests seeking an extension of time in which to take PANCE or PANRE.

2. Special Testing Accommodation Requests

Requests for a special testing accommodation due to a disability must be submitted to NCCPA's special testing accommodations department for consideration. More information on submitting requests for a special testing accommodation and applicable forms can be found at: http://www.nccpa.net/Forms. PAs may request a review by NCCPA's Review Committee when a request for special testing accommodations has been denied. Submittal of an associated fee is required. See the *Review and Appeal Policy and Procedures* for information regarding filing a request for review.

Non-Eligible ETP Requests

1. Violation of NCCPA Standards

NCCPA will not grant ETP requests if the requested exception poses a risk to the public, jeopardizes the integrity of NCCPA exams (e.g., requests to take the exam open-book or outside of a testing center), is inconsistent with NCCPA's mission, does not meet documentation requirements, relates to a policy ineligible for review, or if granting the request would subject NCCPA to unreasonable expense and burden (e.g., requests for NCCPA to develop a different style of exam or to increase the number of CAQ exam administrations, where NCCPA has not developed sufficient test items for multiple administrations). In addition, NCCPA may reject a PA's ETP request that is based on the PA's preference (e.g., a request to log CME by paper rather than electronically) or with which the PA is able to comply but seeks to avoid due to inconvenience or cost (e.g., traveling to a Pearson VUE exam site).

2. Policy Changes

NCCPA does not entertain ETP requests that seek a change in NCCPA's policies.

Examples of policy change requests for which an ETP will not be considered include:

- Requests for exception to requirement of graduation from ARC-accredited PA program or other certification, CAQ, or PA-C Emeritus eligibility requirements
- Requests to lower the passing score for an exam
- Requests for a PANCE or PANRE exam that excludes certain subject areas or that otherwise alters the content of the exam
- Requests to take an exam outside of a testing facility
- Requests for release of proprietary exam information
- Requests to take an exam open-book
- Requests for permission to use the PA-C credential limited to non-clinical practice, where the PA otherwise would not be eligible for the PA-C (usually due to disciplinary action)
- Requests that NCCPA accept non-qualifying CME credits or CME credits earned outside the required timeframe
- Requests to be placed in a different certification maintenance cycle
- Other requests for inconsistent application of NCCPA policies that are unrelated to a PA's inability to comply with requirements (e.g., changes or exceptions to Code of Conduct, Information Disclosure Policy, etc.)
- Requests to waive any CAQ requirements (e.g., to take a CAQ exam at an alternative time or location)
- Requests to waive PA-C Emeritus requirements (e.g. to seek PA-C Emeritus without satisfying the disability, age and/or length of certification requirements)

ETP requests that pertain to changing the material requirements of an established NCCPA policy or procedure are not processed by the Review and Appeals Department as an ETP. Any suggestions that relate to a material policy change may be forwarded to NCCPA for future consideration of a policy change by the Board of Directors. Policy changes are not instituted retroactively, however.

3. Exam Administration

Incidents that occur during the administration of an exam, other than a medical emergency, do not qualify for an ETP review and must be submitted to NCCPA in the form of an exam grievance within three (3) business days of the date of the exam administration. More information on submitting an exam grievance can be found at: http://www.nccpa.net/Legal. PAs may request a review by NCCPA Review Committee when an exam grievance has been denied. Submittal of the associated fee is required. See NCCPA's *Review and Appeals Policy and Procedures* for information regarding filing a request for review.

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