



# 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.** As detailed below, 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:

- Taking 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

***Extenuating Circumstances That May Qualify for an Exception to Policy:***

Examples of extenuating circumstances may include, but are not limited to:

- 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 existence of an extenuating circumstance will not automatically result in the grant of an exception to an NCCPA policy. NCCPA will consider the severity and, if applicable, duration of the extenuating circumstance, as well as how it affected the PA's ability to comply with NCCPA policy requirements.

***Circumstances That Do Not Qualify for an Exception to Policy***

Circumstances that do not qualify for an exception to policy include, but are not limited to:

- Financial hardship unless related to a qualifying 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, having children, getting divorced, etc.), in the absence of other qualifying extenuating circumstances
- 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
- Prioritizing other voluntary commitments, such as pursuing non-PA career or educational programs, over meeting NCCPA requirements

***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
  - 90-day wait between attempts at PANCE or PANRE
  - Inability to take PANCE during the required timeframes (Extension of initial eligibility –Exhaustion of six (6) years and/or six (6) attempts)
  - Inability to take PANRE during the required timeframes (Extension of timeframe to recertify – 6<sup>th</sup> or 10<sup>th</sup> 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 to 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.**

A request for an extension of time in which to take PANCE or PANRE will not be granted simply because a PA has not used all exam attempts within the required timeframe or because the PA cannot schedule remaining exam attempts in the final year of eligibility due to the 90-day waiting period.

## 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. 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 Policies 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 the eligibility 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 PANCE or PANRE outside of a testing facility or open book
- Requests for release of proprietary exam information
- 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
- Requests to waive the requirement to take an examination or earn CME credits
- 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)
  - Requests to waive eligibility and participation requirements for the Alternative to PANRE – Pilot Program

**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.** The Board of Directors examines NCCPA policies on a regular schedule and is provided information about requests for material policy changes. Policy changes may only be affected by the Board of Directors and are not instituted retroactively.

### 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. 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 Appeal Policies and Procedures* for information regarding filing a request for review.

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