

# Policies and Procedures for PA Disciplinary Matters

# I. DISCIPLINARY POLICY

Board Certified PAs, PAs seeking board certification, and PAs holding the PA-C Emeritus designation may be subject to disciplinary action for matters stemming from irregular behavior, fraudulent credentials, legal, regulatory and credentialing actions,; or, if applicable, violation of the National Commission on Certification of Physician Assistants (NCCPA) Code of Conduct for Certified and Certifying PAs and PAs with the PA-C Emeritus Designation (the "Code of Conduct"), as described below, whether or not the PA was board certified at the time of those events.

Jurisdiction if the PA was not board certified at the time of the Matter:

- NCCPA will not initiate disciplinary proceedings against uncertified PAs while the PA remains uncertified and are not seeking board certification.
- When the PA seeks board certification, NCCPA may initiate disciplinary proceedings based on conduct and/or issues that occurred when the PA was not board certified.
- NCCPA asks background questions to board certified and certifying PAs, including PAs who apply to take PANCE for initial board certification and those applying to take PANRE to regain board certification. NCCPA may deny an application, revoke eligibility, or impose other discipline based on events covered by the background questions or can take disciplinary action following board certification based on the certified PA's having failed to accurately and fully disclose conduct or issues that arose while not board certified.

Jurisdiction if the PA no longer holds board certification but violation arose while the PA was board certified, seeking board certification, or holding the PA-C Emeritus Designation:

• NCCPA retains the right to impose discipline against a PA under this policy, even if the PA's board certification expires or the PA retires from practice, provided that the violation triggering the disciplinary proceeding occurred when the PA was board certified, seeking board certification, or holding the PA-C Emeritus designation.

For purposes of the *Policies and Procedures for PA Disciplinary Matters*, the terms "test," "exam," and "examination" include PANCE, PANRE, CAQ examinations, and the longitudinal PANRE-LA.

# A. <u>Irregular Behavior</u>

NCCPA may, at its discretion, deny, or revoke a PA's eligibility, board certification, recertification, Certificate of Added Qualification, or PA-C Emeritus designation

permanently or for such time as may be determined by NCCPA; issue a letter of censure; issue a non-reportable letter of concern; and/or take such other actions as may be deemed appropriate, including taking legal action, if NCCPA determines that the PA engaged in "irregular behavior" as defined and described below. In general, any behavior that in the sole discretion of NCCPA, undermines or threatens the integrity or validity of the application, assessment, or certification processes of NCCPA, whether it occurs before, during or after an exam, shall constitute irregular behavior. Also, at its sole discretion, NCCPA may disqualify a PA from receiving examination scores during the pendency of any disciplinary proceeding relating to alleged irregular behavior.

#### 1. In Connection with An Examination or Examination Items

The behavior of all PAs taking an examination in a test center will be monitored by test center personnel. Test center personnel will notify NCCPA of any candidate who appears to give or receive assistance, or otherwise engages in, or assists another in engaging in, dishonest or other irregular behavior during the examination. PAs taking an examination outside a test center, such as the PANRE-LA, must comply with the rules and conditions of taking that examination.

For purposes of this policy, "irregular behavior" in connection with an examination or examination items shall include engaging in, or assisting another individual in engaging in:

- Cheating or other dishonest behavior.
- Compromising the security of an examination.
- Removal or attempted removal of testing materials from a test center or stealing exam materials.
- Reproducing, distributing, displaying, or otherwise misusing a test question or any part of a test question from an examination, including copying answers from someone else or allowing one's answers to be copied, making notes during an exam administration in a test center other than on the white board provided by the test center, copying or memorizing and reproducing test items.
- Possessing unauthorized materials during an exam administration in a test center (e.g., including, but not limited to, recording devices, photographic materials, reference material, etc.).
- Using recording or photographing devices on test items for tests administered outside of a text center.
- Having or seeking access to exam materials before the exam.
- Consulting with another person about a test item after seeing the test item and before answering the test item.

- Violating the published examination procedures for the examination or the specific examination conditions authorized by NCCPA for the individual in a way that casts doubt on the individual's exam results or that of another person.
- Disclosing to another person the specific content of any test item or test answer.
- Impersonating an examinee or engaging someone else to take the exam by proxy.
- Altering or misrepresenting scores.
- Other behavior which may cast doubt on the exam results of the individual or another person.
- In connection with serving as an item writer for an NCCPA examination, submitting to NCCPA items that are identical or substantially the same as items published by other sources.

## 2. In Connection with a CME Audit

- Failing a CME Audit.
- Failing to comply with the CME Audit Policy, including failing to respond to audit notices and/ or requests for documentation entirely or by the deadline.
- Altering or falsifying documents submitted to NCCPA.

#### 3. In Connection with Failure to Report

- A negative response to one or more questions when an affirmative response should have been submitted.
- Failure to report to NCCPA any adverse regulatory or credentialing action within 30 days of revocation, suspension, surrender, lapse, loss or denial of or any restrictions imposed on a license, authorization, or credential to practice as a health care provider (including authorization to practice as an employee of the federal government or in a jurisdiction not requiring licensure), whether such adverse action is by decision, consent order, stipulation, or agreement.
- Failure to report to NCCPA any adverse legal action within 30 days of conviction of (including a guilty plea or no contest plea) (i) any felony; (ii) any misdemeanor related to health care practice, violence, drug offenses, sex offenses, or fraud; or (iii) any other misdemeanor with a minimum penalty of more than 30 days in jail, except for traffic infractions, first-time DUI offenses, disorderly conduct, obscenity, tax violations, or trespassing.
- 4. In Connection with Communications or Transactions with NCCPA or NCCPA's Agents, Including Test Center Personnel

- Making any fraudulent or knowingly false statement to NCCPA.
- Submitting fraudulent documents to NCCPA.
- Engaging in violent, threatening, harassing, obscene, profane, or abusive communications with NCCPA or NCCPA's agents.
- Failing to cooperate with or respond to inquiries from NCCPA related to the PA's own or another's compliance with NCCPA's policies and the *Code of Conduct*, in connection with NCCPA certification-related matters or disciplinary proceedings.

# 5. In Connection with NCCPA PA-C Emeritus Status

- Failing to notify NCCPA within 30 days of returning to clinical practice.
- Using the PA-C Emeritus designation in any clinical setting or in the context of any clinically- related interaction, including clinical volunteer service.

# B. <u>Use of Fraudulent Credentials</u>

NCCPA may, at its discretion, deny, or revoke a PA's eligibility, board certification, recertification, Certificate of Added Qualification, or PA-C Emeritus designation permanently or for such time as may be determined by NCCPA; issue a letter of censure; issue a non-reportable letter of concern, and/or take such other actions as may be deemed appropriate, including taking legal action, if NCCPA determines that the PA engaged in the use of a "fraudulent credential." NCCPA may also, at its sole discretion, disqualify a PA from receiving examination scores during the pendency of any disciplinary proceeding relating to alleged use of fraudulent credentials.

For purposes of this policy, use of "fraudulent credentials" shall include:

- Manufacturing, modifying, reproducing, distributing, using, or submitting to NCCPA or to any other person or entity a fraudulent or otherwise unauthorized NCCPA certificate, PA-C or PA-C Emeritus designation, CME document, Certificate of Added Qualifications, or other NCCPA document or designation, including falsified documents purporting to verify board certification status or disciplinary status.
- Altering or falsifying NCCPA certification documents.
- Making the false representation by any means that one is certified by NCCPA by using the legally- protected marks, PA-C® or Physician Assistant-Certified® or falsely representing that one has attained a CAQ certificate or Emeritus designation.
- Otherwise falsely claiming to be board certified by NCCPA or falsely

claiming to hold a designation issued by NCCPA.

- Obtaining or attempting to obtain eligibility, board certification, recertification, Certificate of Added Qualification, or PA-C Emeritus designation by deceptive means, including but not limited to submitting or assisting another person to submit to NCCPA any document which contains a material misstatement of fact or omits to state a material fact.
- Assisting another individual to do any of the above.

## C. <u>Legal, Regulatory, or Credentialing Action, Violation of NCCPA's Code of Conduct, or</u> <u>Other Disciplinary Matters</u>

## 1. Automatic Denial or Revocation

- Except as specified herein, NCCPA will automatically deny or revoke a PA's eligibility, board certification, recertification, Certificate of Added Qualification, or PA-C Emeritus designation, if NCCPA determines that the PA is the subject of any of the following, and the violation triggering the disciplinary proceeding occurred when the PA was board certified, seeking board certification, or holding the PA-C Emeritus designation. However, automatic denial or revocation may not apply if the conduct at issue is related to physician assistant/associate practice, and both (1) was consistent with published evidence-based standards of care and practice guidelines and (2) would be considered lawful if performed in a different jurisdiction within the U.S. In such instances, NCCPA will consider the violation under Section I.C.2's discretionary procedures. If a violation occurs when NCCPA does not have jurisdiction over the PA, NCCPA may impose discipline as a discretionary matter at such time that the PA seeks board certification or the PA-C Emeritus Designation from NCCPA.
- Adjudication by a court, licensing board, or federal employer that the PA is mentally incompetent.
- Conviction of or pleading no contest to a felony that is related to physician assistant/associate practice.
- Violation of the Uniform Code of Military Justice that is related to physician assistant/associate practice.
- Loss or denial, for a minimum period of six (6) months or longer, of the PA's license or authorization to practice, including as an employee of the federal government or in a jurisdiction not requiring licensure, due to behavior that is related to physician assistant/associate practice.
- Surrender or lapse, for a minimum period of six (6) months or longer, of the PA's license to practice in lieu of further administrative or disciplinary action that is related to physician assistant/associate practice.
- Suspension of PA license and/or abeyance of authorization to practice, including as an employee of the federal government or in a jurisdiction not requiring licensure, for a minimum period of six (6) months or longer, due to behavior that

is related to physician assistant/associate practice.

- Changing residence to avoid loss of a health care license, or disciplinary action by a state licensing agency for health care professions or to avoid prosecution that is related to physician assistant/ associate practice.
- Violation of a regulatory agency's order that is related to physician assistant/associate practice.

### 2. Discretionary Denial, Revocation, Censure, or Concern

NCCPA may, at its discretion, deny, or revoke a PA's eligibility, board certification, recertification, Certificate of Added Qualification, or PA-C Emeritus designation permanently or for such time as may be determined by NCCPA; issue a letter of censure; issue a non-reportable letter of concern, and/or take such other actions as may be deemed appropriate if NCCPA determines that the PA is the subject of any of the following, or if a matter described under Section I.C.1 of this Policy occurred when the PA was not board certified, seeking board certification, or applying for or holding the PA-C Emeritus designation. Disciplinary matters originally arising under Section I.C.1 of this Policy may instead be subject to discretionary sanctions under this Section if the conduct at issue is related to physician assistant/associate practice, and both (1) was consistent with published evidence-based standards of care and practice guidelines and (2) would be considered lawful if performed in a different jurisdiction within the U.S.

- Conviction of or pleading no contest to a felony.
- Conviction of or pleading no contest to (i) any misdemeanor related to health care practice, violence, drug offenses, sex offenses, or fraud, or (ii) any other misdemeanor with a minimum penalty of more than 30 days in jail, except for traffic infractions, first-time DUI offenses, disorderly conduct, obscenity, tax violations, or trespassing.
- Violation of the Uniform Code of Military Justice.
- Loss or denial of the individual's license or authorization to practice as a health care provider, including as an employee of the federal government or in a jurisdiction not requiring licensure.
- Surrender or lapse of the PA's license or authorization to practice in lieu of further administrative or disciplinary action.
- Suspension of PA license and/or abeyance of authorization to practice, including as an employee of the federal government or in a jurisdiction not requiring licensure.
- Changing residence to avoid prosecution, loss of license, or disciplinary action by a state licensing agency.
- Violation of regulatory or credentialing agency's order.

- Documented evidence of gross incompetence, unprofessional conduct, or unethical conduct.
- Violation of the NCCPA Code of Conduct.
- Probation is placed on the individual's license or authorization to practice as a health care provider, including as an employee of the federal government or in a jurisdiction not requiring licensure.
- Fines issued, restrictions and/or conditions placed on the individual's license or authorization to practice as a health care provider, including as an employee of the federal government or in a jurisdiction not requiring licensure.
- Censure and/or reprimand issued.
- Letter of Concern or Admonition issued.
- Non-compliance with conditions set forth by NCCPA as a condition of imposing a lesser disciplinary sanction or when re-establishment of eligibility for board certification is granted.

#### D. Administrative Suspension

NCCPA may impose temporary administrative suspension of board certification, eligibility for board certification, Certificate of Added Qualifications, or PA-C Emeritus designation if a board certified or certifying PA or a PA with PA-C Emeritus designation fails to provide requested information to NCCPA in response to an NCCPA *Notice of Disciplinary Proceeding* or a letter of inquiry from NCCPA relating to pending criminal charges or convictions, violation of the Uniform Code of Military Justice, violation of NCCPA *Code of Conduct*, or health care licensing proceedings in connection with charges that cast serious doubt on the PA's fitness to practice, or any other inquiry from NCCPA relating to the PA's compliance with NCCPA's policies. If the PA is not currently board certified, and is not currently seeking board certification, NCCPA may impose an administrative suspension when NCCPA receives notice of an adverse action, until such time that the PA seeks NCCPA board certification in the future. Administrative suspensions will not be reported to the Federation of State Medical Boards; however, NCCPA may report administrative suspensions to employers, state medical boards, and other interested parties, if requested.

Before imposing an administrative suspension for failure to respond, NCCPA will first make two attempts to contact the PA by certified mail at the mailing address that the PA has on file with NCCPA and, if the PA has an email address on file with NCCPA, will notify the PA by email that the second certified mail communication has been sent. If the PA fails to respond, NCCPA may, in its sole discretion, impose an administrative suspension. Notice will be sent to the PA notifying the PA of the effective suspension. PAs are solely responsible for updating their contact information on file and ensuring NCCPA has current contact information for them. Failure to do so is not grounds for challenging the imposition of an administrative suspension or any other disciplinary action(s).

The administrative suspension will be placed on the PA's online board certification record and will limit the PA's access within their record until the suspension is lifted. Administratively suspended PAs will receive a message when attempting to access their online record advising them of the suspension. PAs will not be able to complete certification maintenance requirements (logging CMEs, paying fees etc.) or apply for an examination while their record is in an active administrative suspension, and exam scores will be held for any PA in administrative suspension status. An administrative suspension does not change the PA's board certification status; however, a PA's board certification may expire while suspended if the PA fails to contact NCCPA to resolve the issue prior to the expiration of the PA's board certification.

The suspension will be lifted upon NCCPA's receipt of a response from the PA with the requested information. NCCPA has the discretion to extend the administrative suspension if the PA responds but does not provide the full information requested by NCCPA. NCCPA may also proceed with any pending disciplinary proceeding if the PA does not timely respond to a *Notice of Disciplinary Proceeding* or requests for information about the PA's compliance with the *Code of Conduct* and NCCPA's policies.

NCCPA's administrative suspension decisions are not subject to review by NCCPA's Review Committee.

## II. DISCIPLINARY PROCEDURES

#### A. Notice of Disciplinary Proceeding

- 1. Complaints alleging violations of NCCPA's *Code of Conduct* or of Sections I.A, I.B., or I.C of the NCCPA *Disciplinary Policy* may be submitted by any interested party, in accordance with complaint procedures established by NCCPA. NCCPA may initiate disciplinary proceedings based on a submitted complaint and may also self-initiate disciplinary proceedings based on receipt of information relating to a legal, regulatory, or credentialing action, or violation of NCCPA's *Code of Conduct* or of Sections I.A, I.B., or I.C of the NCCPA *Disciplinary Policy*.
- 2. NCCPA shall issue a Notice of Disciplinary Proceeding to the PA describing the allegations of irregular behavior or fraudulent credentials against the PA, or the receipt of information relating to a legal, regulatory, or credentialing action, violation of NCCPA's *Code of Conduct*, or violation of Sections I.A, I.B., or I.C of the NCCPA *Disciplinary Policy*.
- 3. The Notice of Disciplinary Proceeding shall inform the PA that disciplinary actions may be taken by NCCPA.
- 4. The Notice of Disciplinary Proceeding also shall inform the PA that the PA must submit a written response to the allegation within 30 calendar days of the date of the Notice.
- 5. NCCPA shall make a reasonable effort to determine the facts of the matter. Based

on the available facts, including a statement from the PA if submitted, NCCPA shall determine what, if any, disciplinary action is warranted.

6. NCCPA will rely on the factual findings in licensing board actions and criminal conviction records. NCCPA will not reach a contrary factual determination to the factual findings in the licensing board and/or criminal court record but may independently assess whether the factual findings constitute a violation of the NCCPA *Code of Conduct* or of this Policy and what sanctions may be appropriate. NCCPA may also impose discipline based on evidence produced in investigations by licensure agencies in cases in which discipline is imposed by stipulated agreement in lieu of a disciplinary hearing. PAs subject to disciplinary proceedings are encouraged but not required to submit verifiable documentation in support of their response to the Notice of Disciplinary Proceeding.

## III. NCCPA Complaint Procedures

- All complaints must be submitted to NCCPA in writing and signed by the complainant. To the extent practical, the complainant should provide details, specific facts, and documentation of the allegations. Additionally, the complainant should provide their contact information, including a phone number and email address.
- The complaint must also include the following statement:

I authorize NCCPA to contact me regarding this complaint, if deemed necessary. I authorize NCCPA to release this complaint and all other supporting material I have provided or may provide in the future to the subject of the complaint, members of NCCPA's Board of Directors, attorneys and others as deemed appropriate by NCCPA or as required by law.

- The NCCPA will acknowledge receipt of a complaint within 30 days.
- NCCPA has the sole discretion to determine which complaints should be pursued, how they should be pursued, and what action, if any, should be taken, in accordance with the Disciplinary Policy and Procedures.
- The outcome of NCCPA's review of a complaint may or may not be made public.

#### B. <u>Possible Actions and Notice of Decision</u>

#### 1. Possible Actions

NCCPA may take a combination of any of the actions listed or such other action that may be deemed appropriate in the particular circumstance before it if NCCPA determines that the PA is the subject of a legal, regulatory, or credentialing action, the PA has violated NCCPA's *Code of Conduct*, or the PA has otherwise violated Sections I.A, I.B., or I.C of the NCCPA *Disciplinary Policy*.

NCCPA may take any of the following disciplinary actions or such other action as NCCPA in its discretion deems appropriate:

- Deny or revoke the PA's eligibility, board certification, recertification, Certificate
  of Added Qualification, or PA-C Emeritus designation permanently or for such
  time as may be determined by NCCPA. If NCCPA staff determines that
  permanent revocation of eligibility or board certification is warranted, the
  matter will be automatically referred to the NCCPA Review Committee for
  decision.
- Issue a reportable Letter of Censure.
- Issue a non-reportable Letter of Concern.
- Issue a non-reportable Letter of Suspension for failure to respond to an NCCPA request for information.
- Order the PA to retake an examination at a time and place and in a format to be determined by NCCPA.
- Remove the PA from participation in the longitudinal PANRE-LA.
- Refuse to release the score of the PA and, thereby, deny the PA's current application for board certification, recertification, or Certificate of Added Qualification.
- Invalidate one or more quarters in the longitudinal PANRE-LA examination due to Irregular Behavior, without any extension of eligibility to participate in PANRE-LA quarters.
- Require the PA to wait a specified period of time before reapplying to take any NCCPA examination.
- Invalidate the PA's Certificate of Added Qualifications (CAQ) due to NCCPA disciplinary action, encumbered state license, and/or Irregular Behavior.
- Recommend to NCCPA's Board of Directors that legal action be taken.

#### 2. Notice of Decision

NCCPA communicates directly with PAs regarding disciplinary investigations and outcome decisions. If NCCPA receives a request for information regarding a disciplinary investigation or outcome, communication is conducted as specified in NCCPA's *Information Disclosure Policy*.

- If NCCPA determines that **no action** should be taken, NCCPA shall issue a written Notice of Decision to the PA advising the PA that no action shall be taken, and the matter shall be closed.
- When NCCPA determines that a non-reportable disciplinary action, such as

the issuance of a Letter of Concern, should be taken, NCCPA shall issue a written Notice of Decision to the PA.

- a. The Notice of Decision shall describe (a) the basis for and nature of the disciplinary action, and, if appropriate, (b) the applicable section(s) of NCCPA's Policy and Procedures for Disciplinary Matters and/or Code of Conduct.
- b. The Notice of Decision also shall inform the PA that the decision is a non-reportable action that is not subject to further review or Discretionary Appeal and is the final decision of NCCPA.
- If NCCPA determines that a **reportable disciplinary action** should be taken, such as revocation or the issuance of a Letter of Censure, NCCPA shall issue a written Notice of Adverse Decision to the PA.
  - a. The Notice of Adverse Decision shall describe (a) the basis for disciplinary action; (b) the applicable section(s) of NCCPA's *Policies and Procedures for PA Disciplinary Matters* and/ or *Code of Conduct*, and (c) the reportable disciplinary action taken by NCCPA in the matter.
  - b. The Notice of Adverse Decision shall also inform the PA that the PA may accept the disciplinary action or submit a timely Request for Review in accordance with NCCPA's *Review and Appeal Policies and Procedures*. If the PA does not submit a written Request for Review in accordance with NCCPA's *Review and Appeal Policies and Procedures*, the decision of NCCPA shall be the final decision of NCCPA on the matter and shall not be subject to any subsequent Review or Discretionary Appeal absent extraordinary circumstances, as determined solely by NCCPA.
  - c. The Notice of Adverse Decision shall also inform the PA that after a final adverse disciplinary decision has been reached, NCCPA may, as deemed appropriate, report the disciplinary action and the underlying facts thereof to interested parties. Such reporting may include providing a copy or summary of the Final Decision Letter to the Federation of State Medical Boards, any state licensing authority with which the PA holds or has held a license to practice as a PA, the federal government, the PA's employer, and other interested parties, including individuals seeking information about the PA's board certification status, as solely determined by NCCPA. It also may be published on NCCPA's web site if a user verifies your board certification status. Interested parties may request further information, in which case NCCPA will provide a disciplinary report that includes the date and nature of the action, with summary information similar to that reported by NCCPA to the Federation of State Medical Boards. The disciplinary action will also be recorded as a permanent part of your NCCPA file.

#### C. <u>Review of Adverse Decisions</u>

Adverse Decisions, other than removal from participation in the longitudinal PANRE-LA, are subject to Review pursuant to NCCPA's *Review and Appeal Policies and Procedures*.

# D. <u>Application for Reestablishment of Eligibility Following Disciplinary Action</u>

- 1. Applications to reestablish eligibility shall be considered and acted upon at the discretion of NCCPA, except in such cases where the revocation is permanent, or the period of revocation is expressly limited to a specific period of time.
- 2. A PA whose board certification and/or eligibility for board certification, Certificate of Added Qualification, or PA-C Emeritus designation has been denied or non-permanently revoked by NCCPA for a specified time may apply to reestablish eligibility with NCCPA following expiration of such time period.
- 3. To re-establish eligibility, a PA must submit a full statement that includes relevant details that pertain to the PA's circumstances. If NCCPA's decision related to a criminal or military justice conviction, the individual may not apply to reestablish eligibility until all sentences have been served and, unless the Review Committee grants an exception, until all judgments have been satisfied. If NCCPA's decision was based on loss or denial of licensure or authorization to practice, though it is not necessary for the license or authorization itself to be restored, the individual may not apply to reestablish eligibility until the situation *underlying* the loss or denial of licensure or authorization of the NCCPA.

The PA's statement should include:

- An acknowledgment of the PA's actions and a statement of why NCCPA should consider the request for reestablishment.
- An attestation indicating that no new *Code of Conduct* violations have occurred since revocation.
- A description of how the PA has met any NCCPA stipulations.
- An attestation indicating that a state licensing board and, if applicable, any federal employer considering the PA's credentials have been made aware of NCCPA's board certification revocation and of the underlying cause(s) that led to the revocation.

PAs must also submit relevant supporting documentation that will be verified by NCCPA. Examples of supporting documentation to be provided by PAs include, depending on the underlying issue:

- Written notice from a licensing board indicating that the PA would be considered for licensure if the PA passes an NCCPA exam.
- Written notice that any criminal sentences or probationary periods have been served, or other legal requirements have been met.

- Documents (e.g., CME certificates, proof of attendance of an ethics/professional boundaries course) meeting requirements stipulated by NCCPA.
- 4. If the PA applying for re-establishment of eligibility for board certification does not have an active license to practice, NCCPA's decision to reestablish eligibility will be conditioned on the PA providing NCCPA documentation that, within one (1) year of regaining NCCPA board certification after passing PANRE, the PA has obtained a current license to practice as a physician assistant/associate in a state that has full knowledge of the PA's disciplinary history. Failure to provide such documentation of licensure will result in revocation of the PA's board certification and eligibility for board certification. Please note, all PAs applying for reestablishment of eligibility for board certification MUST obtain an active license to practice either prior to NCCPA's decision to reestablish eligibility or within one year of passing PANRE and regaining board certification. This requirement includes those PAs employed by or seeking employment with an employer that does not require licensure.
- 5. NCCPA may also place such other conditions on re-establishment of eligibility for board certification or on maintaining re-established eligibility and board certification as NCCPA in its discretion deems appropriate.
- 6. Failure to comply with re-establishment conditions may result in further disciplinary action, including without limitation revocation of board certification and/or eligibility for board certification.
- 7. As set forth in NCCPA's *Review and Appeal Policies and Procedures*, NCCPA may defer re-establishment requests to the NCCPA Review Committee if NCCPA staff recommend denial of re-establishment for reasons related to the initial revocation decision. In reviewing requests for re-establishment, the Review Committee may grant the request, deny a re-establishment request on a non-permanent basis, or determine to impose permanent revocation of eligibility for board certification.

#### E. <u>Responsibility for Notification of Address Changes</u>

PAs are solely responsible for ensuring that their NCCPA account includes the PA's current mailing and email address. If the PA does not receive notice(s) from NCCPA related to disciplinary review or administrative or disciplinary action due to the PA's failure to notify NCCPA in a timely manner of a change of address, that lack of notification shall not be considered as the basis for an appeal or reconsideration of any administrative suspension or disciplinary decision in the matter.

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