

## CPME 830

# PROCEDURES FOR APPROVAL OF PODIATRIC FELLOWSHIPS

## COUNCIL ON PODIATRIC MEDICAL EDUCATION

Adopted: [Enter Date of Council Adoption]  
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*This publication describes the procedures for approval of podiatric fellowship programs. The procedures, along with the standards and requirements for approval, serve as the basis for evaluating the quality of the educational program offered by a sponsoring institution and holding the institution and program accountable to the educational community, podiatric medical profession, and the public.*

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# INTRODUCTION

The Council on Podiatric Medical Education (CPME) is an autonomous, professional accrediting agency designated by the American Podiatric Medical Association (APMA) to serve as the accrediting agency in the profession of podiatric medicine and surgery. The Council evaluates, accredits, and approves educational institutions and programs. The scope of the Council's approval activities extends to institutions throughout the United States and its territories and Canada.

The mission of the Council is to promote the quality of graduate education, postgraduate education, certification, and continuing education. By confirming these programs meet established standards and requirements, the Council serves to protect the public, podiatric medical students, and doctors of podiatric medicine.

The Council was established by the APMA House of Delegates in 1918 and charged with formulating educational standards. The Council began accrediting colleges of podiatric medicine in 1922. The Council conducted its first residency evaluation in 1964 and approved its first fellowship program in 2000.

The Council has been authorized by the APMA to approve institutions that sponsor fellowship programs that demonstrate and maintain compliance with the standards and requirements published in CPME 820, *Standards and Requirements for Approval of Podiatric Fellowships*. Podiatric fellowship approval is based on programmatic evaluation and periodic review by the ~~Joint~~ Residency Review Committee (~~JRRC~~CRRRC) and the Council.

“Approval” is the recognition ~~accorded~~ granted to fellowships that are determined to be in ~~substantial~~ full compliance with established standards and requirements. The approval process related to a fellowship is ~~either~~ a six ~~or seven~~ step process, involving: (1) development of application and/or pre-evaluation materials documenting the ability of the program to comply with the Council's standards and requirements; (2) onsite evaluation conducted at the institution, at which time the application and/or pre-evaluation materials are validated by an evaluator or evaluation team appointed by the Council; (3) subsequent review by the RRC of findings identified in the report of the on-site evaluation and any information that the program provides following the visit; (4) an approval recommendation from the RRC to the Council; (5) determination of approval status by the Council; (6) periodic follow up of progress in improving the quality of the program. Procedural reconsideration, reconsideration, and appeal of a proposed adverse approval action are available as described in this document. ~~procedural reconsideration, reconsideration, and appeal of a proposed adverse approval action; and (7) periodic followup of progress in improving the quality of the program.~~

Recommendations and decisions relative to the approval process for ~~residencies~~ fellowships are the sole responsibilities of the RRC and/or the Council, as indicated in this publication. Neither Council staff, on-site evaluators, individual members of the RRC or Council, nor any other agent of the RRC or the Council is empowered to make or modify approval recommendations or decisions.

| Prior to adoption, all Council policies, procedures, and standards, and requirements are disseminated widely in order to obtain information regarding how the Council's community of interest may be affected.

The following evaluation/approval procedures have been developed to assist fellowships in preparing for initial or continuing approval and to guide the RRC and the Council in their deliberations concerning the approval of fellowships.

Throughout this publication, the use of the terms "institution" and "program" is premised on the idea that the program exists within and is sponsored by an institution.

## COMMUNICATION BETWEEN THE RRC/COUNCIL AND THE SPONSORING INSTITUTION

Both the sponsoring institution and the program director are responsible for administering the fellowship program. Standards 1-4 in CPME 820 are institutional standards and compliance with these standards is the responsibility of the sponsoring institution. Standards 5-7 are program-specific standards and compliance with these standards is the responsibility of the program director.

The RRC and the Council have adopted the following general policies related to communication with an institution sponsoring a fellowship. Information related to specific correspondence (e.g., notification of approval actions) appears in the pertinent sections of this document.

The RRC and the Council require that the program director is the individual responsible for submitting all materials to Council staff related to all application, on-site evaluation, and approval processes. All materials submitted by the sponsoring institution must be in formats as determined by the Council or its committees accompanied by a cover letter signed by the director. Signatures may be electronic or handwritten. The RRC, Council, and evaluators will not consider unsigned, unverified, or signature-stamped correspondence, clinical logs, and/or fellow evaluation forms. Such materials do not document review and validation by the director. Unsigned, or unverified, or signature-stamped correspondence or fellowship materials will be returned to the program director; submission of such materials may adversely affect the approval status of the fellowship.

All correspondence and inquiries must be directed to the Council office. Utilization of other channels of communication may delay the processing of information submitted by the sponsoring institution and result in inconvenience to the institution.

The RRC and the Council email correspondence to the program director at the director's preferred email address~~office address~~ indicated on the institution's application and/or most recent Annual Report or pre-evaluation report. The institution's chief administrative officer (CAO) or designated institutional official (DIO) is copied on all correspondence. In a co-sponsored program, the email address is that of the institution at which the program director is primarily based (although administrators of all co-sponsoring institutions will receive copies of correspondence from the Council).

The sponsoring institution is responsible for informing the Council office in writing within 30 calendar days of substantive changes in the program. The institution must inform the Council of changes in areas including, but not limited to, sponsorship, appointment of a new program director, change in chief administrative officer or their designee, training sites, and curriculum. Notice of appointment of a new program director or new chief administrative officer must be submitted by an appropriate member of the institution's administrative staff rather than by a representative of the fellowship.

The Council's fellowship documents and forms are available on the Council's website ([www.cpme.org](http://www.cpme.org)). ~~Additionally, copies of the Council's "Memo to Directors" are available on the website. These memos include~~ all proposed changes to Council documents (standards and requirements, and procedures) with a request for comments by a specific deadline. ~~The memo also is designed to inform directors and sponsoring institutions of document changes adopted by the Council, as well as any revisions that were tabled, modified, or deleted as a result of comments provided previously by the community of interest.~~ When the ~~JRC~~RRC or the Council develops a policy (e.g., interpretation of a particular requirement in a Council or ~~JRC~~RRC document), the policy is ~~included in the memo to directors published on CPME's website.~~

Administration of the fellowship program falls directly under the purview of the program director and the institution's chief administrative officer or designated institutional official. As such, formal communication with CPME will always include these individuals. Communication with the administrative staff/program coordinator is not part of the formal communication process. The program director is ultimately responsible for administration of the program.

## RESIDENCY REVIEW COMMITTEE

The RRC is responsible for determining eligibility of applicant institutions for initial on-site evaluation, authorizing increases in fellowship positions, and recommending to the Council approval of fellowship programs. The RRC reviews reports of on-site evaluations, progress reports, and other requested information submitted by sponsoring institutions. The RRC may modify its own policies and/or recommend to the appropriate ad hoc committee modifications in standards, requirements, and procedures for fellowship program evaluation and approval.

Composition of the RRC includes two representatives ~~from each from ABFAS and ABPM (selected by these organizations and confirmed by the Council), two each specialty area in which residency training occurs, one~~ representatives from the Council of Teaching Hospitals (COTH) of the American Association of Colleges of Podiatric Medicine ~~(selected by AACPM and confirmed by the Council), two~~one representatives from residency programs at large (selected by the Council), and at least two Council members.

**Although the RRC is the joint responsibility of various organizations, the Council and its staff administer the affairs of the RRC. Appropriate agreements and financial compensation are arranged among the participating organizations for the administration of the RRC.**

## APPLICATION FOR PROVISIONAL APPROVAL OF A NEW FELLOWSHIP PROGRAM

### Submission of the Application

A fellowship seeking initial approval or reclassification to a new fellowship category must follow the procedures stated for new fellowships. The Council encourages the applicant institution to contact Council staff early in the developmental stages of the program should questions arise related to the Council's standards, requirements, and procedures.

The Council recognizes that programs seeking approval do so voluntarily. Therefore, the burden of proof regarding compliance with Council standards and requirements is the responsibility of the sponsoring institution. Submission of a new application may be required when an approved sponsoring institution or fellowship has undergone a change so substantial that it is essentially a new sponsoring institution or program.

The applicant institution must be in operation for at least 12 months before applying for approval to assure that sufficient resources are available for the program. The institution should have an active podiatric service for at least 12 months prior to applying for approval.

An institution seeking approval of a new podiatric fellowship is required to submit an application fee and ~~the appropriate number of copies of JRRC/CPME form 809, Application for Provisional Approval, and required supplementary documentation (the requested number of copies is indicated on the application)~~ (see Fee Policies). **The application must be submitted prior to activation of the fellowship, at least 12-15 months before the anticipated starting date.** The process for submission of the application through determination of an approval action by the Council may require 12-18 months or more. The entire review process for a fellowship requesting approval may require a period of 12-24 months from the time an application is received in the Council office until the Council takes an approval action.

Council staff reviews the application for completeness. If the application is considered to be incomplete, Council staff corresponds with the program director and specifies the information required to complete the application. If the application, supplementary documentation, and fee are in order, Council staff forwards the institution's application to the RRC for determination of eligibility for on-site evaluation.

If the sponsoring institution ascertains that it has the capability to train more fellows than the number indicated on the application, the institution may amend its application. This amendment must occur **before** eligibility for on-site evaluation has been determined. The program director must inform the Council office of the institution's intention and provide documentation substantiating the ability of the program to increase its proposed number of positions. Council staff will include this information in the materials to be presented to the RRC once the application is complete. (Alternatively, the sponsoring institution may request an increase in positions following the granting of provisional approval; see Authorization of Increases in Fellowship Positions.)

## **Determination of Eligibility for On-site Evaluation**

The RRC considers the application for provisional approval by e-ballot, virtual/conference call, or at one of its meetings. The JRRC considers the application for provisional approval by mail

~~ballot or at one of its semi-annual meetings. The JRRC will consider a complete application within 60 calendar days of its receipt.~~

The RRC reviews the application to determine whether the new fellowship is eligible for on-site evaluation. In determining eligibility, the RRC will not consider ~~program categories or~~ numbers of fellow positions other than those for which the institution has applied. The RRC has the prerogative of taking no action on the application in order to request further information from the sponsoring institution and/or to discuss the application during a subsequent virtual meeting/conference call or upcoming ~~regularly-scheduled~~ meeting.

When the RRC determines that a new fellowship is eligible for on-site evaluation, this status indicates that the institution appears to be developing a fellowship that has the potential for meeting the Council's standards and requirements for approval. **Neither eligibility for on-site evaluation nor the conduct of an initial on-site evaluation ensures eventual approval.**

Correspondence regarding the RRC action is addressed to the program director. ~~A copy of the letter is forwarded to~~ the chief administrative officer or designated institutional official of the sponsoring institution is copied on the correspondence. If eligibility for on-site evaluation is confirmed, the letter includes a copy of CPME 811, *Agenda Guide for Institutions Eligible for On-site Evaluation*, to assist the director in planning for the initial on-site evaluation.

If the RRC proposes denial of eligibility for on-site evaluation, justification for the action is delineated in the letter and provisions for requesting procedural reconsideration, reconsideration, and appeal are identified (see Procedural Reconsideration, Reconsideration, and Appeal). ~~If the RRC proposes denial of eligibility for on-site evaluation, the institution is required to verify to the Council, in writing, that all program applicants selected for interview and/or prospective fellows have been notified of this approval status (applicants must be notified in writing prior to the interview) (see Fellow Notification of Action).~~

## **Withdrawal or Termination of the Application**

A sponsoring institution that has submitted an application for provisional approval or for which eligibility for on-site evaluation has been determined may withdraw its application at any time before the RRC takes an action on the approval status of the program.

Council staff may terminate the application for either of the following reasons:

- The sponsoring institution fails to formally respond within six months to written requests from Council staff and/or RRC for information to complete the application.
- The sponsoring institution fails to schedule the on-site visit within six months of the date the institution was determined eligible for the evaluation.

~~If the sponsoring institution fails to respond in writing within six months to written requests from Council staff and/or the JRRC for information to complete the application, the application will be terminated by staff.~~ Council staff will correspond with the program director and the



institution's chief administrative officer or designated institutional official to inform them that the application has been terminated. The sponsoring institution may submit a new application, supplemental materials, and application fee after the application has been terminated.

## **RE-EVALUATION AND CONTINUING APPROVAL OF AN EXISTING FELLOWSHIP PROGRAM**

Council staff regularly reviews the list of approved programs and contacts the appropriate program directors when re-evaluation is due (see Categories of Approval and Approval Period). ~~For reasons of economic feasibility, Council staff gives consideration to the geographic proximity of institutions when developing the list of institutions to be evaluated during each evaluation cycle.~~

The Council may elect to deviate from the established onsite evaluation cycle by conducting either a comprehensive or focused visit to follow up on identified concerns. Circumstances that may warrant scheduling a follow-up visit include, but are not limited to: when a program has been transferred to another institution, when a fellowship has undergone a substantial change, when major deterioration in the fellowship has occurred, and/or when a formal complaint against an approved fellowship requires onsite evaluation of the issues related to the complaint. ~~In any event, t~~The Council reserves the right to conduct an evaluation of the fellowship whenever circumstances require such review. Continuation of approval by the Council is contingent upon the findings of the onsite evaluation team and an approval recommendation by the RRC. Therefore, the re-evaluation may have an impact on the previously-granted approval status.

### **Pre-evaluation Materials**

An institution seeking continuing approval of a fellowship must submit CPME ~~form~~ 810, *Pre-evaluation Report*, along with all required supplementary documentation. ~~The director must submit four copies of CPME 810, along with four copies of required supplementary documentation.~~ If the Council staff review determines that the pre-evaluation report is ~~considered to be~~ incomplete, the program director will be notified and requested to submit the required information. An on-site evaluation will not be conducted if this requested material is not received, which may jeopardize the approval status of the program. In the event the on-site evaluation is cancelled due to non-receipt of requested information in a timely manner, the visit may be re-scheduled, but all costs related to the visit will be the responsibility of the sponsoring institution.

### **ON-SITE EVALUATION (NEW AND EXISTING FELLOWSHIP PROGRAMS)**

The on-site evaluation is conducted to assess the general quality of the fellowship, the institution's ability to achieve the objectives established for the program, and the institution's plans for continued improvement. The evaluation team appointed to conduct the visit gathers information related to the validation of the institution's application for provisional approval or pre-evaluation report. The evaluation team develops a report of its findings that includes a

~~narrative summary identifying program strengths and weaknesses and areas of potential noncompliance. The evaluation team develops a report of its findings that identifies any areas of potential noncompliance and includes a narrative summary that identifies program strengths and weaknesses.~~

Evaluation team members do not act as consultants to the fellowship or the sponsoring institution. The team members' primary roles are as fact-finders and observers ~~are~~ to provide the RRC an assessment of the sponsor's potential compliance with the Council's standards and requirements. ~~With a view toward~~In the spirit of assisting the institution in their efforts of continuous improvement of~~to understand more completely its role as related to~~ the fellowship, the evaluation team report may include non-binding recommendations for improvement of the program.

## Evaluation Team

The Council chair appoints the evaluation team based upon a recommendation from the RRC chair and Council staff. The initial on-site evaluation is conducted by at least two evaluators; ~~one of whom must be a podiatrist. On-site re-evaluation of an approved fellowship is generally conducted by a team comprised of at least two evaluators with one evaluator representing the board under which specialty the fellowship concentrates training.~~ Under special circumstances, one ~~podiatrist evaluator~~ may evaluate an approved fellowship (the reader should note that, for the remainder of this document, "evaluation team" is used to refer to both single evaluators and evaluation teams).

The institution has the prerogative of ~~rejecting-refusing to accept~~ any member of the proposed evaluation team when an appropriate cause related to conflict of interest can be clearly identified. In such a case, a written statement from the sponsoring institution is to be submitted to the Council office no later than 15 calendar days after receipt of the on-site confirmation letter, 30 calendar days before the date of the on-site evaluation, affording the Council sufficient opportunity to appoint a replacement evaluator. The Council does not appoint members to the evaluation team who have any known conflict of interest in the evaluation of the institution, including graduates and current and former faculty members or administrators of the institution.

The evaluation team represents the Council and the RRC. At least one of the members of the evaluation team is a diplomate of the specialty board which is the focus of the fellowship. ~~Evaluation team members may include, but not be limited to, current residency evaluators, current and former members of the Council and the Council's committees and members of the Council's professional staff. Individuals (e.g., current members of the Council and the Council's committees and members of the Council's professional staff) may accompany an evaluation team to observe the on-site evaluation. Another individual (e.g., a representative of the state board for examination and licensure) may accompany an evaluation team to observe the on-site evaluation.~~ If the Council and/or the RRC elect to conduct a focused visit, the individual(s) appointed to conduct the visit may represent either the Council or the RRC, depending upon the reason(s) for which the visit is scheduled.

~~Ordinarily, individuals who are selected to serve on Council~~ Evaluation team ~~members~~ will have participated in a training session for residency ~~and/or fellowship~~ evaluators. ~~Individuals who are selected to serve as~~ Evaluation team chairs will have participated previously in on-site evaluations of residencies and/or fellowships.

The Collaborative Residency Evaluation Committee (CREC), consisting of representatives of the American Board of Foot and Ankle Surgery (ABFAS), the American Board of Podiatric Medicine (ABPM), and the Council, is responsible for appointing and training new and current on-site evaluators.

## **Preparation for On-site Evaluation**

The chair of the evaluation team determines the date of the on-site evaluation in conjunction with the program director and the other member(s) of the evaluation team. Once eligibility for on-site evaluation is determined for a new program, the evaluation is conducted in sufficient time to allow for consideration of the report of the on-site evaluation at regularly ~~\_-~~ scheduled meetings of the RRC and the Council. Ordinarily, an institution sponsoring an existing program is given approximately 45 calendar days' notice prior to the on-site evaluation. The timeline for evaluating an existing program may be abbreviated when the on-site evaluation is conducted in response to RRC and/or Council concerns about major deterioration or substantial change in the fellowship has occurred or when a formal complaint against an approved fellowship requires on-site evaluation of the issues related to the complaint.

Once the evaluation team and the sponsoring institution have agreed on the date and time of the evaluation, Council staff corresponds with the director to confirm the names of the members of the evaluation team and the time and date of the evaluation. ~~A copy of~~ The CPME 811, *Agenda Guide*, is forwarded to the program director. Using the agenda guide, the director is required to work with the team chair to prepare a schedule identifying personnel to be interviewed by the evaluation team. The agenda must be forwarded to the Council office at least four weeks prior to the on-site visit to allow for adjustments if necessary.

The director of a provisionally-approved or an existing fellowship ~~may~~ will be requested to make available appropriate clinical log forms to the evaluation team prior to the date of the evaluation. The evaluation team retains the prerogative of requesting additional information on the day of the visit if warranted.

When a focused visit is scheduled, the letter informing the program director of the date of the evaluation includes specific information related to interviews to be conducted and information to be available for review by the evaluator(s).

## **Conduct of the On-site Evaluation**

Depending on the number of individuals and facilities involved, a minimum of one day ~~(6-8 hours)~~ is required to evaluate a podiatric fellowship. In order that the evaluation team may assess the curriculum content and the extent of fellow supervision, the agenda for the on-site

evaluation requires that key participants in the program be interviewed, as indicated in CPME 811.

As part of the on-site evaluation, the team conducts interviews with the program director, chief administrative officer or designated institutional official, director of medical education, members of the podiatric and non-podiatric faculty, and, for provisionally-approved and existing programs only, the podiatric fellow(s). The evaluation includes a tour of the physical facilities, a working session to allow for review of charts and additional information provided, an executive sessions of the evaluation team to discuss findings and recommendations, and a concluding session with the program director and the chief administrative officer to discuss the findings. During the exit interview with institutional representatives, the evaluation team chair explains the Council's procedures for initial and/or continuing approval of fellowships (specifically, the sequence of events that will follow the visit).

~~Evaluation of a fellowship also includes observation of fellow participation in podiatric patient treatment related to the specialty area, if appropriate.~~

Failure of key participants in the fellowship to be available will be cause for cancellation of the on-site visit, which may jeopardize the approval status of the program.

Interviews must be conducted with active faculty directly involved in the fellows' training and for all rotations provided by the program. Video interviews may be acceptable for rotation faculty only if a rationale is provided. Video interviews must be approved by the team chair in conjunction with CPME staff on a CPME-approved platform determined ahead of time and provided by the institution.

If an evaluation team member is unable to physically attend the on-site evaluation due to emergency circumstances, a team member may participate virtually in the site visit.

### **Virtual Site Visits**

CPME staff, in consultation with the Council chair, may determine that a virtual site visit must be conducted in lieu of an on-site visit due to natural disasters, pandemics, or other circumstances of that magnitude. The program director is responsible to ensure that the evaluation team has adequate opportunity to engage in all of the meetings listed above. The program director should prepare, ahead of time, all technological necessities to ensure that the evaluation team meets with the individuals as cited above and for all documentation reviews. Additionally, the program director is to prepare contingency plans in case of unforeseeable technological difficulties including power loss or other acts of nature. CPME will provide the virtual platform and will share the access codes for the meetings.

If for any reason the evaluation team is not provided with the opportunity to hold these meetings, or if the individuals requested are not in attendance sufficient to adequately assess the program, then the Council may determine that the report of the on-site evaluation is not sufficient to consider approval of the program and may schedule another site visit at cost to the program.

Inability to communicate with the individuals due to technological barriers will be viewed negatively by the evaluation team and ultimately by the Council.

~~***Emergency addition to CPME 830 due to the COVID-19 pandemic:*** This addition to CPME 830 concerning the use of virtual site visits was approved by CPME on June 3, 2020. The addition provides a new policy and procedure allowing site visit teams to conduct virtual site visits during the pandemic. This policy will be updated as needed by the Council.~~

### ~~**For Programs Engaging in Virtual Site Visits**~~

~~If CPME staff, in consultation with the Council chair, determines that a virtual site visit must be conducted in lieu of an on-site visit due to national disasters, pandemics, or other circumstances of that magnitude, then the program director is responsible to ensure that the evaluation team has adequate opportunity to engage in all of the meetings listed above. The program director should prepare, ahead of time, all technological necessities to ensure that the evaluation team meets with the individuals as cited above and for all documentation reviews. Additionally, the program director is to prepare contingency plans in case of unforeseeable technological difficulties including power loss or other acts of nature. CPME will provide the virtual platform and will share the access codes for the meetings.~~

~~If for any reason the evaluation team is not provided with the opportunity to hold these meetings, or if the individuals requested are not in attendance sufficient to adequately assess the program, then the Council may determine that the report of the on-site evaluation is not sufficient to grant approval of the program and may schedule another site visit at cost to the program. Inability to communicate with the individuals due to technological barriers will be viewed negatively by the evaluation team and ultimately by the Council.~~

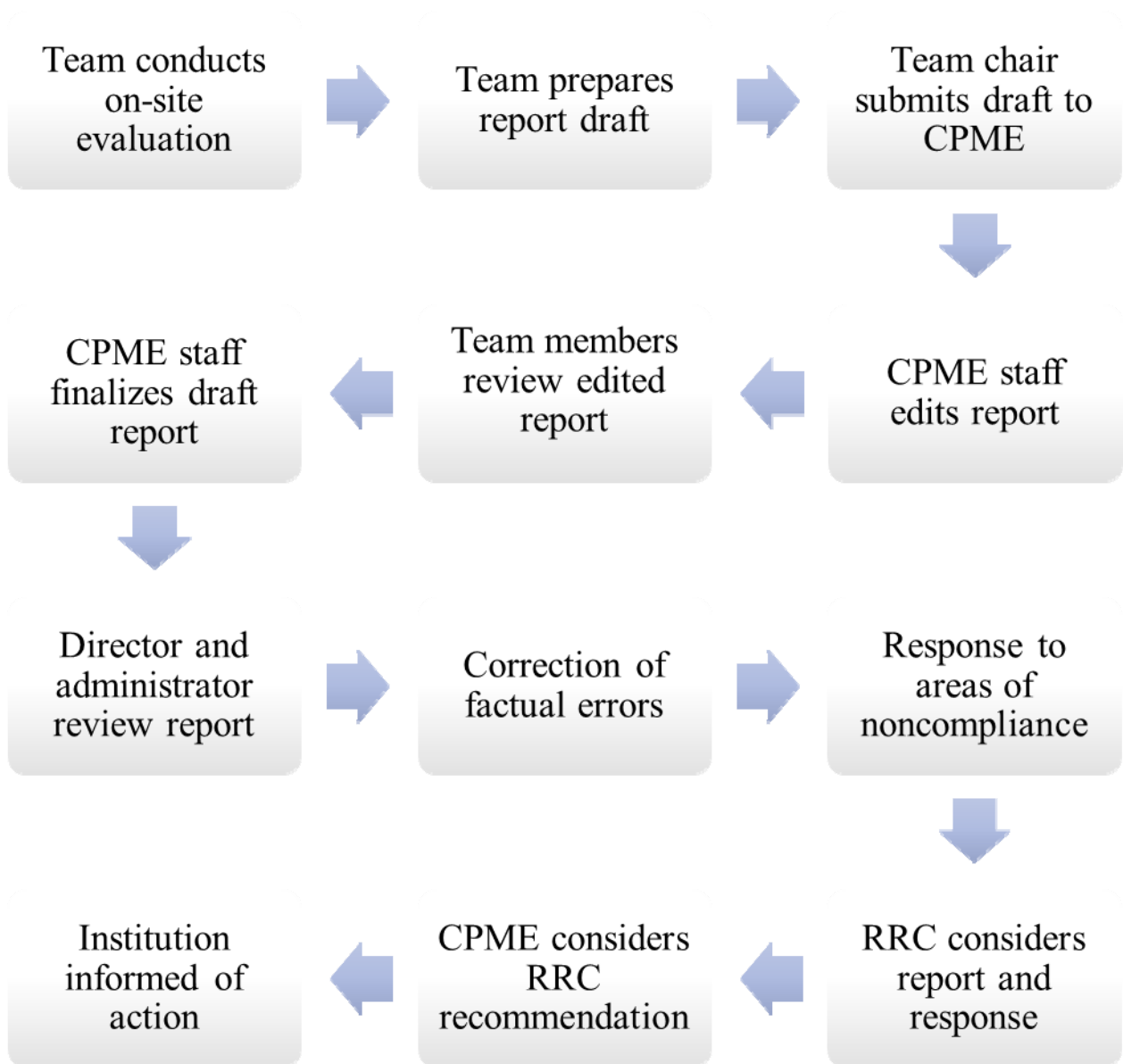
### **Preparation of the Report**

The evaluation team prepares a draft report based on observations and impressions from the on-site evaluation. The team forwards this draft report to the Council office for editing. The edited draft of the report is then returned to each member of the team for review and comments.

A draft copy of the report, consisting of a summary of findings, a list of interviewees, areas of potential noncompliance, commendations, and recommendations, is forwarded to the program director and the chief administrative officer of the sponsoring institution.

The sponsoring institution ~~is encouraged to~~must provide a substantive response to areas of potential noncompliance ~~and recommendations~~ identified by the evaluation team, as well as any supporting documentation, prior to consideration of the report by the RRC. The cover letter to the institution specifies ~~the number of copies to be submitted as well as~~ the deadline for their receipt. Factual information included in the report may be corrected by the institution; however, impressions and observations based on the on-site visit will not be modified.

The following steps are included in the approval process:



## CONSIDERATION BY THE RRC AND THE COUNCIL

### RRC Review

The Residency Review Committee meets prior to each of the semiannual meetings of the Council. The Committee reviews evaluation team reports, institutional responses to evaluation team reports, interim progress reports from provisionally-approved programs, progress reports from provisionally-approved and approved programs, and requests for reconsideration, and other requests to the RRC.

During discussions about the approval status of individual fellowships, any member of the RRC who is affiliated with the institution under consideration in a governance, administrative, staff, or faculty capacity must recuse himself or herself themselves from the deliberations. Members of the RRC who served on the most recent fellowship evaluation team are required to recuse themselves from discussion and voting until the Council has determined a final approval action.

#### Review of Evaluation Team Reports

Based upon review of the draft of the team report and any response submitted by the sponsoring institution, the RRC makes a confidential recommendation to the Council regarding the approval status of the program (see Categories of Approval and Approval Period).

The confidential recommendation includes the approval status, date by which the next on-site evaluation must be conducted and/or approval period, authorized number of fellows, identification of areas that are in potential noncompliance with Council standards and requirements, ~~identification of areas of noncompliance that have been addressed in the institution's response to the evaluation team report, identification of areas that merit commendation,~~ and a schedule for requesting progress reports, including the interim progress report required of a provisionally-approved program.

In reviewing an on-site evaluation report, the RRC has the prerogative of recommending that the Council revise the report, which may include adding, modifying, or deleting areas of potential noncompliance.

#### Review of Interim Progress Reports and Progress Reports

The RRC considers interim progress reports submitted by provisionally-approved programs related to development of the program in accordance with the program's proposed clinical and didactic curriculum once ~~the a~~ fellow is active in the program (see Categories of Approval and Approval Period).

The RRC also considers progress reports submitted by existing provisionally-approved and approved programs related to correction of specific areas of noncompliance with CPME standards and requirements and/or concerns identified by the RRC and/or the Council.



Based upon review of the progress report and/or the interim progress report, the RRC determines the extent to which the submitted information addresses previously-identified concerns and/or makes a confidential recommendation to the Council regarding the approval status of the program (see Categories of Approval and Approval Period).

The confidential recommendation includes the approval status, date by which the next on-site evaluation must be conducted and/or approval period, authorized number of fellows, identification of areas that are in noncompliance with Council standards and requirements, identification of areas of noncompliance that have been addressed in the progress report, ~~identification of areas that merit commendation~~, and a schedule for requesting progress reports. The institution may be requested to submit further documentation of progress made in addressing areas of noncompliance and/or concerns expressed by the RRC.

In reviewing an interim progress report and/or a progress report, the RRC has the prerogative to add, modify, or delete areas of noncompliance or make a confidential recommendation to the Council regarding a change in the approval status of the program (see Categories of Approval and Approval Period). ~~to recommend that the Council add, modify, or delete areas of noncompliance.~~

## **Council Action**

At a meeting of the Council, the chair of the RRC presents for each fellowship the confidential recommendation of the RRC regarding approval status, date by which the next on-site evaluation must be conducted and/or approval period, authorized number of fellows, identification of areas that are in potential noncompliance with Council standards and requirements, identification of areas of potential noncompliance that have been addressed in the institution's response to the evaluation team report or in the institution's progress report, identification of areas that merit commendation, and a schedule for requesting progress reports. Areas of noncompliance determined by the Council may include, but are not limited to, those indicated by the evaluation team and the RRC. The institution may be requested to submit documentation of progress made in addressing areas of noncompliance and/or concerns expressed by the RRC or the Council.

Approval actions are taken by the Council at official meetings of the Council. Under special circumstances, mail-e-ballots or virtual meetings/conference calls may be used for fellowship approval decisions.

During discussions about the approval status of individual fellowships, any member of the Council who is affiliated with the institution under consideration in a governance, administrative, staff, or faculty capacity must recuse himself or herself themselves from the deliberations. Members of the Council who served on the most recent fellowship evaluation team are required to recuse themselves from discussion and voting until the final approval action has been determined.

## **CATEGORIES OF APPROVAL AND APPROVAL PERIOD**



The Council bases the approval action on the category and number of fellow positions that each institution has requested. The Council has established the following categories of approval, which are published on the Council's website:

The following approval actions are available to the Council:

- ~~For a **new fellowship that has completed an initial on-site evaluation**, the Council grants provisional approval or withholds provisional approval.~~
- ~~For a **provisionally approved fellowship that has submitted an interim progress report and/or a progress report**, the Council extends provisional approval (with or without further progress reports) or probation with an immediate on-site evaluation.~~
- ~~For a **provisionally approved fellowship that has completed an on-site re-evaluation**, the Council extends approval (with or without further progress reports) or extends probation.~~
- ~~For an **existing approved fellowship that has completed an on-site re-evaluation or that has submitted a progress report**, the Council extends approval (with or without further progress reports), extends probation, or withdraws approval (the option of withdrawal of approval applies only to a program already on probation).~~

~~The Council bases the approval action on the category and number of fellow positions that each institution has requested. The Council has established the following categories of approval:~~

## **Provisional Approval**

Provisional approval indicates recognition of a new fellowship that, in general, is expected to be in substantial compliance with the Council's standards and requirements for approval upon activation of the program. Provisional approval is determined on the basis of on-site evaluation prior to activation of the fellowship. When the Council grants provisional approval, this status is ~~effective on the date the action is taken by the Council pending activation of the program by a sponsoring institution that has undergone an initial on-site evaluation (i.e., the effective date of provisional approval is the date on which a fellow first becomes active in the fellowship program following the Council action)~~ (see Activation of a Provisionally-approved Fellowship).

Provisional approval will not be considered for any training year or portion of a training year prior to the effective date of granting of provisional approval.

As a condition of continued provisional approval, the institution must provide an **interim progress report** by a date identified in the approval letter. The interim progress report allows the RRC to monitor the continued development of the program in accordance with the program's proposed clinical and didactic curriculum once the fellow is active in the program. The interim progress report includes, but is not limited to, fellow clinical logs documenting participation in relevant activities related to the specialty area, ~~if appropriate~~, documentation of the program's assessment of the fellow's progress in achieving **objectives/competencies**, the formal schedule for clinical training, and the signed fellow contract or letter of appointment.

As a further condition of continued provisional approval, the institution also may be requested to provide one or more **progress reports** at specified intervals, as indicated in the approval letter. The progress report(s) is to demonstrate correction of specific areas of noncompliance in meeting one or more requirements and/or to address concerns identified by the RRC and/or the Council. ~~Customarily, the institution is provided at least six months from the time of the on-site evaluation or submission of the most recent progress report to correct areas of noncompliance.~~

Provisional approval extends no longer than 24 months beyond the designated length of the program.

The approval letter includes the date by which the next scheduled on-site evaluation will occur. Ordinarily, on-site re-evaluation of a **new** provisionally-approved podiatric fellowship is conducted during the program's ~~third~~ fourth year of operation. The RRC and/or the Council may schedule an earlier on-site re-evaluation should significant concerns become evident from review of the program's progress report(s).

## **Approval**

Approval indicates recognition of an existing fellowship that, ~~in general,~~ is in substantial full compliance with the Council's ~~approval~~ standards and requirements for approval. In granting ~~an extended period of~~ approval, the Council expresses its confidence in the abilities of the institution to continue providing adequate support and implementing ongoing improvements in the fellowship.

~~As a condition of continued approval, the institution may be requested to provide one or more progress reports at specified intervals, as indicated in the approval letter. The progress report(s) is to demonstrate correction of specific areas of noncompliance in meeting one or more requirements or to address concerns identified by the JRRC and/or the Council. Customarily, the institution is provided at least six months from the time of the on-site evaluation or submission of the most recent progress report to correct areas of noncompliance.~~

The approval letter includes the date by which the next scheduled on-site evaluation will occur. Re-evaluation of an existing program is scheduled ~~no later than~~ approximately six years from the date of its previous evaluation. The RRC and/or the Council may schedule an earlier on-site re-evaluation should significant concerns become evident from review of the program's progress report(s).

## **Approval with Report**

Approval with Report indicates recognition of an existing fellowship that is in substantial compliance with the Council's standards and requirements for approval. In granting approval, the Council expresses its confidence in the abilities of the institution to continue providing adequate support and implementing ongoing improvements in the fellowship.

As a condition of continued approval, the institution may be requested to provide one or more progress reports at specified intervals, as indicated in the approval letter. The progress report(s) is to demonstrate correction of specific areas of noncompliance in meeting one or more

requirements or to address concerns identified by the RRC and/or the Council. Failure to meet the requirements as stated by the Council may result in probation.

The approval letter includes the date by which the next scheduled on-site evaluation will occur. Re-evaluation of an existing program is scheduled approximately six years from the date of its previous evaluation. The RRC and/or the Council may schedule an earlier on-site re-evaluation should significant concerns become evident from review of the program's progress report(s).

The RRC may request that the institution submit additional progress reports to allow for further monitoring of issues of concern and/or to answer questions arising from review of the progress report.

## **Probation**

Probation indicates that a fellowship is in noncompliance with the Council's approval standards and requirements to the extent that the quality and effectiveness of the fellowship are in jeopardy. This category serves as a strong warning to the institution that serious problems exist that could cause the fellowship to fail. When probation is extended, the fellowship is considered to be a candidate for withdrawal of approval. The RRC and/or the Council have the prerogative of adding to the probationary action the requirement that no new fellows enter the program until areas of noncompliance have been addressed to the satisfaction of the RRC and the Council.

The program must provide evidence of significant progress in correction of areas of noncompliance within a specified period. This period of probation is to be determined by the Council, but is usually limited to a maximum of two years. Failure to meet the requirements as stated by the Council during the two-year period, including any extension for good cause, will result in withdrawal of approval.~~Customarily, the institution is provided at least six months from the time of the on-site evaluation or submission of the most recent progress report to correct areas of noncompliance. Probation may not extend for more than two years.~~

~~This category applies only to previously approved programs (including provisionally approved programs) and is a published approval status.~~—A decision to extend probation is not subject to the Council's procedures for procedural reconsideration, reconsideration, or appeal.

The institution is required to verify to the Council, in writing, that all current fellows, prospective fellows, and program applicants selected for interview have been notified of this approval status (applicants must be notified in writing prior to the interview) (see Fellow Notification of Action).

## **Administrative Probation**

~~Administrative probation indicates that a fellowship has failed to submit information or fees following two separate requests. The category of administrative probation may be activated automatically without vote by the Council based upon a lack of response by the institution to requests related to annual or pre-evaluation reports, payment of annual assessment or on-site evaluation fees, or other information about the program. The institution will be notified in writing that materials and/or fees are past due and that consideration is being given to placing the~~

~~fellowship on administrative probation. If no response is received within 30 calendar days, administrative probation will become effective.~~

~~This category applies only to previously approved programs (including provisionally approved programs and programs approved on a probationary basis) and is a published approval status. A decision to grant administrative probation is not subject to the Council's procedures for procedural reconsideration, reconsideration, or appeal.~~

~~Administrative probation is removed when all requested materials and/or fees are received. If no response is received from the institution, the Council considers withdrawing approval of the program at its next scheduled meeting. Withdrawal of approval is based upon the perception that the institution no longer desires to be recognized by the Council and voluntarily withdraws from approved status. The action is viewed as a voluntary decision of the institution; it is not subject to the Council's procedures for procedural reconsideration, reconsideration, or appeal.~~

~~The institution is required to verify to the Council, in writing, that all current fellows, prospective fellows, and program applicants selected for interview have been notified of this approval status (applicants must be notified in writing prior to the interview) (see Fellow Notification of Action).~~

## **Withholding of Provisional Approval**

Withholding of provisional approval is determined in the event that a new program seeking provisional approval evidences substantial noncompliance with the Council's standards and requirements for approval. When the Council proposes withholding provisional approval of a fellowship, factors that have a significant impact on the effectiveness of the program are identified as the basis for the action. A decision to withhold provisional approval will not become final or be published until the processes of procedural reconsideration, reconsideration, and appeal are exhausted (see Procedural Reconsideration, Reconsideration, and Appeal).

~~When the Council proposes to withhold provisional approval of a program, the institution is required to verify to the Council, in writing, that all program applicants selected for interview and/or prospective fellows have been notified of this approval status (applicants must be notified in writing prior to the interview) (see Fellow Notification of Action).~~

## **Withdrawal of Approval**

Withdrawal of approval is determined under any one of the following conditions:

- A program on probation has failed to correct one or more areas of noncompliance, or a new area(s) of noncompliance has emerged, and therefore the program evidences substantial noncompliance with the Council's standards and requirements for approval.
- An institution withdraws voluntarily from fellow training. Actions to withdraw approval voluntarily are not subject to the Council's procedures for procedural reconsideration, reconsideration, and appeal.

- Two or more programs merge into a single new program, resulting in the loss of identity of a previously-approved program.
- ~~An institution that has been placed on administrative probation does not provide requested materials and/or fees.~~
- A program has remained inactive for a period of more than two consecutive training years (see Inactive Status).

When the Council considers an action to withdraw approval, factors that have a significant impact on the effectiveness of the fellowship are identified as the basis for the action. The RRC and/or the Council have the prerogative of adding to the action to withdraw approval the requirement that no new fellows enter the program until areas of noncompliance have been addressed to the satisfaction of the RRC and the Council. A decision to withdraw approval will not become final or be published until the processes of procedural reconsideration, reconsideration, and appeal are exhausted. Reconsideration and appeal are available only to sponsors on probation that have failed to correct areas of noncompliance (see Procedural Reconsideration, Reconsideration, and Appeal).

When the Council proposes to withdraw approval of a program, the institution is required to verify to the Council, in writing, that all current fellows, prospective fellows, and program applicants selected for interview have been notified of this approval status (applicants must be notified in writing prior to the interview) (see Fellow Notification of Action).

## NOTIFICATION OF ACTION

Within a reasonable period following ~~each of the Council's two~~ meetings, an approval letter indicating the Council action is forwarded to each institution currently under consideration. Confidential correspondence regarding Council actions is addressed to the program director. ~~A copy of the letter is forwarded to t~~The chief administrative officer of the sponsoring institution is copied on all correspondence.

When the Council action is to place the program on probation, to continue probation, ~~to place the program on administrative probation,~~ to withhold provisional approval, or to withdraw approval, the letter to the director is sent by ~~certified~~-email, with a ~~return-read~~ receipt requested. Letters to withhold provisional approval or to withdraw approval are forwarded to the director within 30 calendar days of the Council action.

Each letter indicates the approval status of the program and number of authorized positions. When the Council takes an action that requests submission of an interim progress report and/or a progress report, the letter identifies the reason(s) for taking the action. The letter outlines the necessary information that must be submitted for the RRC and Council to review the approval status of the program at future scheduled meetings, as well as the date on which this information is due ~~in-to~~ the Council ~~office~~.

When the Council considers withholding provisional approval or withdrawing approval, the letter advising the institution of the proposed action contains: (a) the specific reason(s) for taking the proposed action, (b) the date the action becomes effective unless a request for procedural reconsideration or reconsideration is received from the institution, (c) the right of the institution to request procedural reconsideration, reconsideration, and appeal and the date by which such a request must be received by the Council, and (d) the institution's obligation to inform current fellows, prospective fellows, and program applicants selected for interview regarding the approval status of the program.

~~When a fellowship is placed on administrative probation, the director and the chief administrative officer of the institution receive notification from Council staff that the institution has failed to respond to at least two requests for information or payment of fees. The institution is informed of its responsibility to notify current fellows, prospective fellows, and program applicants selected for interview of the approval status of the program. The letter to the institution also describes the consequence of withdrawal of approval if immediate attention is not directed to responding to the Council's previous requests.~~

When the approval action is based on the report of an on-site evaluation, a final copy of the report is enclosed with the approval letter. The report reflects the fellowship as it existed at the time of the on-site evaluation. The final report will indicate whether identified areas of noncompliance have subsequently been corrected, partially corrected, or not corrected. ~~The final report does not, therefore, reflect program modifications made subsequent to the on-site evaluation that may have been described in the institution's response to the draft report.~~ The institution may distribute the final report as it wishes and is encouraged to provide as wide a distribution as possible to the faculty members who participate in the program.

The Council awards a certificate to institutions sponsoring programs recognized in the categories of provisional approval and approval.

## FELLOW NOTIFICATION OF ACTION

When the Council places a program on probation or withdraws program approval, ~~or the JIRC takes or proposes certain actions,~~ the sponsoring institution is required to verify to the Council, in writing, that all current fellows, prospective incoming fellows, and program applicants selected for interview have been notified (applicants must be notified in writing prior to the interview).

~~Current fellows, prospective fellows, and program applicants must be notified of denial of eligibility for initial on-site evaluation, probation, administrative probation, withholding of provisional approval, withdrawal of approval, denial of an increase in positions, and voluntary termination of the program.~~

The institution must submit a copy of the letter sent to the applicant/prospective fellow/current fellow. The institution also must submit either the applicant's/prospective fellow's/current fellow's written acknowledgment of the status of the program or verifiable documentation of this individual's receipt of the institution's letter ~~(i.e., signed copies of return receipts for certified mail).~~ These materials must be submitted as part of the progress report, informing the institution

~~of the action taken by the Council. These materials must be received in the Council office within 50 calendar days of the director's receipt of the letter informing the institution of the action taken by the JRRC or the Council.~~

## ACTIVATION OF A PROVISIONALLY-APPROVED FELLOWSHIP

~~Provisional approval is effective on the date granted by the Council. As stated previously, when the Council grants provisional approval, this status is pending activation of the program by a sponsoring institution that has undergone an initial on-site evaluation (i.e., the effective date of provisional approval is the date on which a fellow first becomes active in the fellowship program following the Council action).~~ Provisional approval will not be considered for any training year or portion of a training year prior to the effective date of granting of provisional approval.

The Council recognizes that a fellowship may have an effective date of provisional approval that is later than the customary starting date of July 1. The Council permits up to six months of fellowship training overlap on a one-time basis for programs that begin after July 1.~~the sponsoring institution to begin its second complement of fellows on its preferred starting date (e.g., July 1) during the program's second year of operation.~~

The Council ~~will~~may withdraw provisional approval if the fellowship is not activated within two calendar years of the effective date of provisional approval.~~anticipated starting date indicated in the institution's application for provisional approval.~~ This action is considered a voluntary withdrawal and is not subject to the Council's procedures for procedural reconsideration, reconsideration, or appeal.

## PROCEDURAL RECONSIDERATION, RECONSIDERATION, AND APPEAL

The following reconsideration and appeal procedures are available for each of the following proposed adverse actions.

If the RRC proposes **denial of eligibility for on-site evaluation**, the institution may request one of the following:

- Procedural reconsideration, followed by reconsideration, followed by appeal, **or**
- Reconsideration, followed by appeal.

If the RRC proposes **denial of an increase in positions**, the institution may request one of the following:

- Procedural reconsideration, followed by reconsideration, **or**
- Reconsideration.



If the Council proposes **withholding provisional approval or withdrawing approval**, the institution may request one of the following:

- Procedural reconsideration, followed by reconsideration, followed by appeal, **or**
- Reconsideration, followed by appeal.

A request to initiate the processes of procedural reconsideration, reconsideration, or appeal will be accepted for cause and will not be accepted solely on the basis of dissatisfaction with the proposed adverse action, nor will it be accepted on the basis of modifications made subsequent to the determination of the adverse action. A fellowship that conforms to Council standards, requirements, and/or procedures following determination of an adverse action (resulting in withholding of provisional approval or withdrawal of approval) will be viewed as a new fellowship and will be required to follow the application procedures described earlier in this [publication document](#).

The institution receives formal written notification of the adverse action following the action of ~~the JRRC or~~ the Council. The basis for the adverse action and the institution's right to request procedural reconsideration, reconsideration, and appeal are stated clearly in the notification letter.

When ~~the JRRC or~~ the Council considers an adverse action [\(resulting in withholding of provisional approval or withdrawal of approval\)](#), the action does not become final, nor is it published, until the institution has been afforded an opportunity to complete the processes related to procedural reconsideration, reconsideration, and/or appeal. If the institution does not initiate the procedural reconsideration, reconsideration, or appeal processes [within the required time frame](#), the institution's rights to due process through the Council are viewed to be exhausted.

During this due process period, the approval status of the fellowship reverts to the status prior to the adverse action, [and the program is prohibited from accepting new fellows](#). If the Council sustains an action to withdraw approval, the final action becomes effective at the conclusion of the academic year in which the action is sustained.

## **Procedural Reconsideration**

Procedural reconsideration is the process that allows the institution the opportunity to request that the Council review the proposed adverse action for the purpose of determining whether the Council, the RRC, or the evaluation team failed to follow Council procedures described in this publication. Because procedural reconsideration is designed for the review of errors in the application of Council procedures, matters of disagreement related to issues of substance will not be reviewed within the procedural reconsideration process. Such matters, however, may be identified as the basis for a request for reconsideration and/or appeal.

A request for procedural reconsideration must be submitted within ~~15-30~~ calendar days following receipt of the notification letter. If such a request is not submitted and postmarked [or date-stamped](#) within this ~~30-45~~-day period, the Council considers the institution to have waived all



rights to procedural reconsideration. The sponsoring institution is encouraged to submit its written request to the Council office by ~~email~~certified mail, with a ~~return-read~~ receipt requested.

The request for procedural reconsideration must identify the procedure(s) in question and describe in detail the institution's claim that the procedure(s) was not followed, including any documentary evidence to support the claim. Following receipt by Council staff, the request for procedural reconsideration is considered by the Council's Executive Committee by virtual meeting/conference call or ~~actual-in-person~~ meeting. The Council acknowledges in writing the receipt of all procedural reconsideration materials.

Based on a recommendation of the Executive Committee, a decision may be made by the Council, either by virtual meeting/conference call or in-person meeting to: (1) sustain the previous action, (2) rescind the previous action and refer the matter for additional review by the RRC, or (3) defer action and conduct a new on-site evaluation. If a new evaluation is conducted, the cost of the evaluation is shared equally by the institution and the Council. The program director and the institution's chief administrative officer are notified of the action taken with respect to the procedural reconsideration no later than 30 calendar days following the next scheduled meeting of the Council following the original determination of the action that led to the request for procedural reconsideration.

## Reconsideration

Reconsideration is the process that allows the institution the opportunity to request that the RRC and/or the Council review the proposed adverse action for the purpose of determining whether any error or omission occurred in making the decision.

A written request for reconsideration must be received ~~in-by~~ the Council ~~office~~ within 30 calendar days following receipt of the notification letter. If a request for reconsideration is not received within this 30-day period, the Council considers the institution to have waived all rights to reconsideration and subsequent appeal. The sponsoring institution is encouraged to submit its written request to the Council office by ~~email~~certified mail, with a ~~read~~return receipt requested.

The request must include specific facts and reasons for which the institution contends the adverse action should not be taken, ~~as well as an appropriate number of copies of substantiating materials~~. Council staff acknowledges in writing the receipt of all reconsideration materials.

-Following receipt by Council staff, the materials are considered by the RRC by virtual meeting/conference call or at its next scheduled meeting. Reconsideration related to denial of eligibility for on-site evaluation or an increase in positions may be considered by the RRC by virtual meeting/conference call or at its next scheduled meeting. Reconsideration related to withholding of provisional approval or withdrawal of approval must be considered by the RRC at its next meeting.

Related to proposed actions to deny eligibility for on-site evaluation or to deny an increase in positions, the RRC has the options of rescinding or sustaining the proposed action.

Reconsideration of the adverse action is completed no later than the next scheduled meeting of the RRC following the original determination. The program director and the institution's chief administrative officer are notified of the RRC action.

Based on a recommendation of the RRC, a decision to sustain or rescind a proposed action to withhold provisional approval or withdraw approval is considered by the Council at its next scheduled meeting. A recommendation may be made by the RRC and/or the Council to assess the request for reconsideration by conducting an on-site evaluation of the fellowship. The on-site evaluation is designed to evaluate the particular issues or concerns related to the adverse action.

When an on-site evaluation is conducted, action is deferred to the second scheduled meeting following the original determination of the adverse action. The program director and the institution's chief administrative officer are notified of the Council's action.

During the reconsideration process, a representative(s) of the institution under reconsideration may request in writing the opportunity to provide a statement to the RRC regarding the proposed adverse action. Any additional information that is to be brought to the attention of the RRC must be submitted to the Council ~~office~~ prior to the meeting. ~~The institution must provide an appropriate number of copies of all written materials.~~

## **Appeal**

Following completion of the procedural reconsideration and/or reconsideration processes, the institution may appeal the decision to a hearing committee. The appeal process followed by the Council is articulated in CPME 935b, *Guidelines for the Conduct of Appeals by Residencies, Fellowships, Providers of Continuing Education, and Specialty Boards*. The institution is free to pursue a substantive and/or procedural claim.

## **REAPPLICATION FOLLOWING WITHHOLDING OR WITHDRAWAL OF APPROVAL**

An institution seeking approval of a fellowship program that has had provisional approval withheld or approval withdrawn is expected to follow the procedures outlined for new fellowships (see Application for Provisional Approval of a New Fellowship Program and Fees). With respect to re-evaluation of a program that has had provisional approval withheld or approval withdrawn, the RRC will focus principal attention on those areas that were of greatest concern in the original decision to withhold provisional approval or withdraw approval.

## **AUTHORIZATION OF INCREASES IN FELLOWSHIP POSITIONS**

Increases in fellowship positions are considered and authorized by the RRC. Applications for increases are considered by ~~mail-e-ballot~~, ~~virtual meeting/conference call~~, or at a ~~regularly-scheduled~~ meeting of the RRC. The RRC has the prerogative of taking no action on the application in order to request further information from the sponsoring institution and/or to

discuss the application during a subsequent ~~mail-e~~-ballot, virtual meeting/conference call, or ~~upcoming regularly scheduled~~ meeting.

Institutions seeking authorization of increases in positions in provisionally-approved and/or approved fellowships are required to submit ~~RRC form CPME 845, Application for Increase in Positions~~, required supplemental materials, and an application fee (see Fee Policies). The application must be submitted prior to activation of the fellowship position(s), preferably at least six months before the anticipated starting date. A six-month lead time is necessary should additional information be required. ~~The JRRC will consider the request for an increase within 60 calendar days of receipt of a complete application.~~

The effective date of granting an authorization of increased fellowship positions by the RRC will be no earlier than the date on which the program has both authorization of the increase and the additional fellow(s) in place.

In order to determine whether the institution has the appropriate resources for an increase in fellowship positions, the RRC will review information including, but not limited to:~~the following information:~~

- The last on-site evaluation report, pertinent progress report materials, and most recent approval letter.
- Pertinent section(s) of annual report(s) submitted since the most recent on-site evaluation.
- A complete CPME 845, Application for Increase in Positions,~~RRC form 845~~. The application provides information regarding the rationale for the proposed increase with supporting documentation to justify the increased number of positions.

**The RRC will not consider an application for an increase submitted by a program on probation.** If a program on probation increases positions without authorization, the Council will withdraw approval of the program at its next scheduled meeting.

~~If the new positions have already been activated in an approved program and authorization is denied, the JRRC will mandate, by placing the program on probation, a reinstatement of the number of positions existing prior to the increase, effective at the beginning of the next fellowship year.~~

~~If the JRRC proposes denial of the increase in positions, the institution is required to verify to the Council, in writing, that all current fellows, prospective fellows, and program applicants selected for interview have been notified of the proposed denial (applicants must be notified in writing prior to the interview) (see Fellow Notification of Action).~~

If the sponsoring institution fails to respond in writing within six months to written requests from Council staff and/or the RRC for information to complete the application, the application will be terminated by staff. Council staff will correspond with the program director and the institution's chief administrative officer to inform them that the application has been terminated. The

sponsoring institution may submit a new application, supplemental materials, and application fee after the application has been terminated.

## INACTIVE STATUS

A fellowship or position(s) in an approved fellowship that is temporarily inactive will be considered eligible for continued approval for a period not to exceed ~~two-three~~ years immediately following completion of the last full year of training. A fellowship that is not reactivated within ~~two-three~~ years must follow the application procedures for new programs if and when training is reinitiated. If a fellowship position(s) is not reactivated within ~~two-three~~ years, the sponsoring institution must submit ~~JRRC~~CPME ~~form~~ 845, *Application for Increase in Positions*, and the application fee if and when the position(s) are to be reactivated. (An inactive program or position is one in which funding, staffing, or available training resources have been interrupted or in which a suitable or interested candidate for the fellowship has been unavailable.)

### Inactive Status for Provisionally Approved Programs

A fellowship or position(s) in a provisionally approved fellowship that is temporarily inactive will be considered eligible for continued approval for a period not to exceed two years immediately following the granting of provisional approval by the Council. A fellowship that is not activated within two years must follow the application procedures for new programs if and when training is initiated. If a fellowship position(s) is not activated within two years, the sponsoring institution must submit CPME 845, *Application for Increase in Positions*, and the application fee if and when the position(s) are to be activated or reactivated. (An inactive program or position is one in which funding, staffing, or available training resources have been interrupted or in which a suitable or interested candidate for the fellowship has been unavailable.)

Institutions with inactive, approved programs are required to submit the CPME 840, *Annual Report for Podiatric Fellowships*-~~annual report forms~~ and annual assessment fees throughout the recognized period of inactivation.

The RRC will not consider extensions of approval for inactive programs that have reached the end of their approval period.

## RESIGNATION, TERMINATION, OR SUSPENSION OF THE FELLOW

If a fellow resigns from or is terminated or suspended from a fellowship for any reason, written notice must be sent to the Council ~~office~~ within 30 calendar days of the termination date. It is the responsibility of the program director to notify the Council of any resignation, suspension, or termination of a fellow, regardless of the approval status of the program.

If the fellow's appointment is suspended or terminated, the notice must indicate the general cause for the termination and date of termination but need not contain a statement of specific

facts. The notice also must contain a description of the process by which the suspension or termination decision was reached to assure that institutional due process procedures were followed.

## **EXTENSION OF TRAINING**

The program must notify the Council regarding extension of training. When the extension goes beyond three full months, the notice must include:

- a revised contract,
- training schedule for the extended period of training,
- the projected completion date,
- the reason for extension of training, and
- the impact extension of training will have on the other fellows in the program.

Additional information may be required by the RRC.

Leave of absence: If a fellow's leave of absence results in extension of training, the program must submit written notice to Council staff within 30 days of the fellow's return from a leave of absence. The notice must include the exact dates of the leave of absence.

Performance improvement: The program must submit written notice to the Council for performance improvement plans that result in extension of fellow training beyond the length of the fellowship.

## **TERMINATION OF THE PROGRAM**

If an institution with an approved fellowship closes or if for any other reason the program is discontinued, the Council will withdraw approval of the program based on voluntary termination by the sponsoring institution, effective on the date of closure or termination of the fellowship.

It is the responsibility of the program director and/or the chief administrative officer to notify the Council in writing of termination of the fellowship. Additionally, the institution is required to verify to the Council, in writing, that all current fellows, prospective fellows, and program applicants selected for interview have been informed of the voluntary termination of the program (when possible, applicants must be notified in writing prior to the interview) (see Fellow Notification of Action).

Within 30 days of the closure of the program, the sponsoring institution must complete the Annual Report or provide a formal letter to the Council identifying the names of the fellows who have completed the program and copies of certificates (if applicable).

## **PROGRAM TRANSFER/CHANGE IN SPONSORSHIP**

Institutional sponsorship of a training program may be transferred from one institution to another under certain circumstances. The program director ~~should~~must contact the Council ~~office~~ in

writing within 30 days of sponsorship changes to determine whether transfer of the program is appropriate or whether reapplication as a new program is necessary. In the event the program sponsorship change constitutes the addition or removal of a co-sponsor, the institution must notify the Council in writing within 30 days of this change. A request for transfer of institutional sponsorship should be submitted as early in the training year as possible should reapplication and on-site evaluation be necessary.

The following documentation is required in all cases:

- Letter of intent from the chief administrative officer of the new sponsoring institution or co-sponsoring institution (if applicable)
- Letter from the chief administrative officer of the original sponsoring institution acknowledging the transfer or addition of a co-sponsoring institution
- List of any new administrative staff (CAO/DIO) and podiatric and non-podiatric medical faculty (with board qualification/certification status and professional qualifications)
- Contact information for the program director and CAO/DIO, including phone number, email, and mailing address
- Copies of signed fellow contracts
- Curriculum vitae of the program director (if the director is new)
- Copies of affiliation agreements (if applicable)
- Fellowship manual that includes all required components (refer to CPME 820, requirement 3.10)

A full or focused on-site evaluation may be required.

The Council has developed two mechanisms by which sponsorship may be transferred while maintaining program approval:

- ~~If the institutions are owned by the same corporate entity and retain the same administrative staff and podiatric and non-podiatric medical faculty, the program director provides substantive evidence to this effect to the Council office. The request must include a letter of intent from the new sponsoring institution, as well as a letter from the chief administrative officer of the original sponsoring institution acknowledging the transfer. The RRC considers the request by mail ballot or conference call or at one of its regularly scheduled meetings and develops a confidential recommendation for action by the Council by mail ballot or at its next scheduled meeting.~~
- ~~If the former sponsoring institution has closed or has changed to such an extent as to preclude providing the necessary resources for fellowship training, the new sponsoring institution is requested to provide the Council office a letter of intent to sponsor the program and a copy of a signed contract with each fellow. In the instance where the former sponsoring institution is still in existence, a letter from the chief administrative officer of that institution acknowledging the extent of changes must be submitted. The program director must remain the same individual; however, under extenuating circumstances, the RRC may determine that another individual may assume the position of director if he or she possesses the appropriate qualifications for the directorship and is able to provide administrative continuity to the program. The RRC considers the request~~



~~by mail ballot or conference call or at one of its regularly scheduled meetings and develops a confidential recommendation for action by the Council by mail ballot or at its next scheduled meeting. The RRC and the Council conduct a full or focused on-site evaluation as soon as possible to determine the continued approval of the program.~~

~~In either event, tThe institution to which the program is transferred must grant a certificate to each fellow who successfully completes the program. The certificate must be appropriate for the fellow's entire training sequence and the type of program that is approved by the Council.~~

## ANNUAL REPORT

Completion of an annual report ~~form~~, CPME 840, Annual Report for Podiatric Fellowships, is required of each institution sponsoring an approved fellowship beginning with the program's first year of provisional approval. The Annual Report provides the Council ~~with~~ current information for CPME's database and the List of Approved Fellowships maintained on the Council's website. ~~publication 800, Directory of Podiatric Fellowship Programs~~. As part of the Annual Report, the Council ~~requests~~ requires the names of fellows completing the program and the fellows selected for the next training year.

Co-sponsoring institutions must submit CPME 840 that provides information about the program as a whole. The Annual Report for the co-sponsored program is to include the signatures of the program director and of the chief administrative officers, or their designees, of each co-sponsoring institution.

If extenuating circumstances exist relative to fellow completion of a training year, the director must notify the Council within 30 days of the decision and provide this information in the Annual Report. Examples of extenuating circumstances include, but are not limited to, an extension of a fellow's training period to address instances of unsatisfactory performance ~~and~~ or to complete a portion of the training year that the fellow was unable to fulfill due to illness and/or disability.

Council staff reviews annual reports and brings concerns to the attention of the RRC at its next ~~scheduled~~ meeting. Council staff may correspond with the program director to request that the sponsoring institution provide specific information for consideration at the RRC meeting.

Failure to submit the Annual Report, including any corrections/clarifications requested by Council, and/or fee is cause for the Council to place the sponsor on ~~administrative~~ probation and subsequently to consider withdrawal of approval. The RRC and/or Council reserve the right to request additional materials to clarify the Annual Report.

## CONFIDENTIALITY AND DISCLOSURE POLICIES

All reports and communications regarding fellowships are confidential within the Council, RRC, appeal committees, evaluation teams, and Council staff. On-site evaluators, RRC members, and Council members sign a confidentiality statement on a periodic annual basis, confirming that privileged information will not be disclosed in any manner.

Because of the tripartite relationship of accreditation, certification, and licensure, the Council has the prerogative of providing confidential information regarding the approval status of residencies to the appropriate Council-recognized specialty boards and to state boards for examination and licensure, upon the specific written requests of these organizations.

All proceedings of the RRC and the Council with respect to determining fellowship recommendations and actions are held in executive session.

The Council office, the RRC, and the Council will not release or confirm the following information in any form:

- The name or status of a sponsoring institution that has initiated contact with the Council office concerning an application for provisional approval or increase in positions.
- The name or status of a sponsoring institution that has applied for provisional approval or an increase in positions but has not yet been apprised of a decision; or
- The name or status of a sponsoring institution that has applied for and been denied eligibility for on-site evaluation or authorization of an increase in positions (prior to exhaustion of the procedural reconsideration, reconsideration, and appeal processes, as applicable).
- The name or status of a sponsoring institution that has had provisional approval withheld or approval withdrawn (prior to exhaustion of the procedural reconsideration, reconsideration, and appeal processes).

All inquiries as to the approval status of a specific sponsoring institution will be answered by referral to the ~~published directory~~ list of approved podiatric fellowships on the CPME website or to the institution in question.

The List of Approved Fellowships on the Council's website identifies fellowships holding provisional approval, residencies that are approved, and fellowships approved on a probationary basis. Areas of noncompliance, as reflected by standard and requirement numbers, will be included for all programs not in full compliance with Council standards and requirements.

~~The Council publishes a directory of fellowships on an annual basis and makes a frequently updated version of the directory available on its web site. The directory identifies fellowships that are eligible for on-site evaluation, fellowships holding provisional approval, fellowships that are approved, and fellowships approved on a probationary basis (including administrative probation).~~

~~Denial of eligibility for on-site evaluation, withholding of provisional approval, and withdrawal of approval~~ are published following exhaustion of the entire process of procedural reconsideration, reconsideration, and appeal or following the institution's indication that it does not wish to pursue these processes. ~~Denials of increases in fellowship positions are~~



~~published following exhaustion of the entire process of procedural reconsideration and reconsideration or following the institution's indication that it does not wish to pursue these processes.~~

## **THIRD-PARTY COMMENT**

The Council provides an opportunity for individuals or organizations to submit written comments concerning an institution's qualifications for provisional or continued approval. The Council will publish a notice in the *APMA News* and on its website regarding its plans to conduct either a focused evaluation or a comprehensive evaluation of an institution that seeks provisional approval or continuation of approval. The notice will indicate the deadline for receipt of third-party comments. ~~Comments must address an institution's compliance with CPME standards and requirements.~~

Third-party comments must be signed, address substantive matters relating to the quality of the program and the CPME standards and requirements and be received no later than 15 days prior to the program's scheduled visit date. Comments will be forwarded to the evaluation team, and to the program director for response if appropriate, during the evaluation visit process. An updated list that includes the date of each visit will be maintained on the Council's website.

## **REVIEW OF FORMAL COMPLAINTS**

A mechanism exists for reviewing formal complaints against approved fellowships. The Council reviews only those complaints related to the alleged noncompliance of a program with the Council's standards and requirements. The mechanism for reviewing formal complaints is specified in CPME ~~publication~~-925, *Complaint Procedures*.

## **STATEMENTS OF APPROVAL STATUS**

An institution sponsoring a provisionally-approved fellowship must use the following statement in reference to its approval status:

The (category of program) sponsored by (name of institution) has been granted provisional approval by the Council on Podiatric Medical Education. Provisional approval is the recognition accorded a new fellowship that is determined to be in substantial compliance with established standards and requirements. The Council is an independent, specialized accrediting agency that provides accreditation and approval services for the American Podiatric Medical Association.

An institution sponsoring an approved fellowship must use the following statement in reference to its approval status:

The (category of program) sponsored by (name of institution) is approved by the Council on Podiatric Medical Education. Approval is the recognition accorded a fellowship that is determined to be in substantial compliance with established standards and requirements. The Council is an independent, specialized accrediting agency that provides accreditation and approval services for the American Podiatric Medical Association.

An institution sponsoring a fellowship that is approved on a probationary basis must use the following statement in reference to its approval status:

The (category of program) sponsored by (name of institution) is approved on a probationary basis by the Council on Podiatric Medical Education. Probation indicates that a fellowship is in noncompliance with the Council's standards and requirements for approval to the extent that the quality and effectiveness of the fellowship are in jeopardy. The Council is an independent, specialized accrediting agency that provides accreditation and approval services for the American Podiatric Medical Association.

No other statements regarding approval by the Council may be used without the permission of the Council.

## **ASSESSMENT OF EVALUATOR EFFECTIVENESS**

The effectiveness of the onsite evaluation process is assessed formally by the institution and the evaluation team. The Collaborative Residency Evaluator Committee (CREC) monitors the effectiveness of on-site evaluators by reviewing evaluation questionnaires completed by institutions regarding the performance of on-site evaluators, as well as those completed by the team leaders and other team members. CREC forwards a report of its review, identifying areas requiring follow-up and evaluators who might require remediation or dismissal to the Executive Committee of the Council for its review. CREC is the collaborative effort of ABFAS, ABPM, and the Council to develop, implement, and review procedures to select, train, and assess podiatric residency evaluators and team chairs. Executive Committee of the Council reviews questionnaires completed by the sponsoring institution and evaluation team members.

In reviewing team reports, the RRC may forward comments about individual evaluators to the Council's Executive Committee. To assure objectivity in its approval recommendations, the RRC is never provided the post-evaluation questionnaires completed by the sponsoring institution and evaluation team members.

The Council commends effective evaluators and provides remediation for ineffective evaluators. The RRC, CREC, and/or the Executive Committee may suggest to the Council that evaluators who demonstrate repeated ineffectiveness be removed from the list of fellowship evaluators.

## **NONDISCRIMINATION POLICY**

~~The Council prohibits discrimination in accord with federal, state, and local regulatory guidelines and policies in the election and appointment of members, students, and public representatives to the Council and its committees and in the selection of evaluation team members, consultants, employees, and others involved in its activities.~~  
The Council prohibits discrimination related to all of its activities on the basis of sex, creed, race, national origin, age, color, sexual orientation, gender identification, political belief, disability, or any other factor protected by law.

## FEE POLICIES

The Council has developed fee schedules for various aspects of its evaluation and recognition activities as outlined in CPME Policies and Miscellaneous Documents.

The costs related to on-site evaluations of new programs are borne by the sponsoring institution. The Council requires pre-payment of a specified on-site evaluation fee.

Institutions that have had provisional approval withheld or approval withdrawn and subsequently reapply must submit a reapplication fee.

The Council has established an annual fee assessed to each institution sponsoring an approved fellowship or fellowships. A late fee is assessed related to submission of the annual assessment fee.

Institutions requesting appeals of adverse actions are assessed a portion of the anticipated actual costs prior to the appeal. Institutions are billed the remainder of any additional actual costs after the appeal.

The fees are nonrefundable. The Council reserves the right to add or revise established fees.

Application fees have been established for institutions seeking provisional approval of a new program and for institutions requesting authorization of increased fellowship positions.

All costs related to on-site evaluations of new and approved programs are borne by the sponsoring institution. The Council requires pre-payment of a specified on-site evaluation fee. Following the on-site evaluation, the Council office bills the sponsoring institution for the remainder of the full cost of the visit.

Institutions that have had provisional approval withheld or approval withdrawn and subsequently reapply must submit a reapplication fee.

The Council has established an annual fee assessed each institution sponsoring an approved fellowship. The Council assesses a per program fee and a per fellow fee. A late fee is assessed related to submission of the annual assessment fee.

The fees are nonrefundable. The Council reserves the right to revise established fees.

CPME 830

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