Association of Professional Chaplains Policy on Acceptable Clinical Pastoral Education:

Policies and Standards for certification are established by the Association of Professional Chaplains. APC’s affiliate, the Board of Chaplaincy Certification Inc. certifies chaplains according to these standards.

BCCI requires Board Certified Chaplains to have acquired 4 units of clinical pastoral education (CPE) and Associate Certified Chaplains to have acquired 2 units of clinical pastoral education in order to obtain their certification. The following guidelines are how APC/BCCI evaluate the quality of education and supervision of CPE programs in order to qualify as certification candidates.

Qualifications for Recognized CPE programs:

1. Qualified CPE programs must be recognized by the Department of Education (DOE) and accredited by a DOE approved agency as a “post-graduate level training program.” The Department of Education has stated that only post-graduate level clinical training programs may lead to certification and licensure for “Allied Health Professionals.”
   a. Allied health is defined in the Federal Code and further defined in The Patient Protection and Affordable Care Act (ACA). Allied health is also included in eligibility criteria for participation in grant programs administered by the U.S. Department of Labor and the U.S. Public Health Service. The ACA (P.L. 111-148) defines allied health professionals as follows: 1) ALLIED HEALTH PROFESSIONAL.—The term “allied health professional” means an allied health professional as defined in section 799B(5) of the Public Health Service Act (42 U.S.C. 295p(5)) who— (A) has graduated and received an allied health professions degree or certificate from an institution of higher education; and (B) is employed with a Federal, State, local or tribal public health agency, or in a setting where patients might require health care services, including acute care facilities, ambulatory care facilities, personal residences, and other settings located in health professional shortage areas, medically underserved areas, or medically underserved populations, as recognized by the Secretary of Health and Human Services.
   b. The Federal Government does not recognize programs classified as “Continuing Education Programs” as viable pathways for entry into the workforce.

2. Qualified CPE Programs must be eligible for Medicare Reimbursement for allied health education. See CFR Title 42, Chapter IV, Subchapter B, Part 413, Subpart F, Section 413.85(c)(2) and 413.85 (d)(1)(i)(c) and 413.85(e). Our intent is to ensure that Medicare pass-through payments are only provided for programs that enable an individual to be employed in a capacity that he or she could not have been employed without having first completed a particular education program.
   a. According to the U.S. Department of Health and Human Services (HHS), only DOE recognized, and accredited post-graduate level clinical training programs lead to certification and licensure of allied health professionals.
b. A CPE internship, or any other CPE training that is a requirement for a degree, whether it is undergraduate, graduate, or doctoral, is not eligible for Medicare reasonable cost pass-through payment.

Notes:

i. APC/BCCI do allow for up to 1 unit of CPE to come from a provider that does not meet the qualifications included in this policy, provided that the applicant submits the appropriate Clinical Pastoral Education Equivalency Worksheet along with the appropriate fee.

ii. While APC/BCCI affirm that our certified chaplains are employed in a multitude of settings (including corrections, education, athletics, health services, and others), we are conscientious of the larger number of healthcare institutions that require employed chaplains to be certified. In order to maintain a uniform standard for all of our certified chaplains, regardless of their present place of employment, APC has used the Code of Federal Regulations and the requirements for allied health professionals as our standard for Clinical Pastoral Education. Not only does this standard maintain high qualifications for education and training as provided by federal code, it also provides our certified chaplains with employment mobility should they wish to move into a healthcare setting at any point during their careers.