

Credential Maintenance Program Administrative Manual

Version 1.1

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RELIABILITY | RESILIENCE | SECURITY



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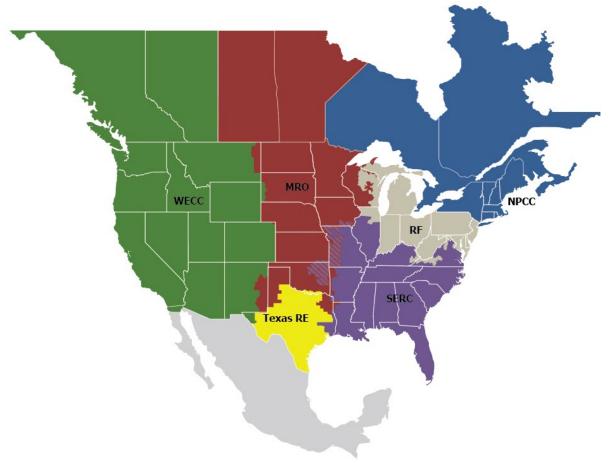
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Preface

Electricity is a key component of the fabric of modern society and the Electric Reliability Organization (ERO) Enterprise serves to strengthen that fabric. The vision for the ERO Enterprise, which is comprised of the North American Electric Reliability Corporation (NERC) and the six Regional Entities, is a highly reliable and secure North American bulk power system (BPS). Our mission is to assure the effective and efficient reduction of risks to the reliability and security of the grid.

Reliability | Resilience | Security Because nearly 400 million citizens in North America are counting on us

The North American BPS is made up of six Regional Entity boundaries as shown in the map and corresponding table below. The multicolored area denotes overlap as some load-serving entities participate in one Regional Entity while associated Transmission Owners/Operators participate in another.



MRO	Midwest Reliability Organization			
NPCC	Northeast Power Coordinating Council			
RF	Reliability First			
SERC	SERC Reliability Corporation			
Texas RE	Texas Reliability Entity			
WECC	WECC			

Chapter 1: Manual Overview

NERC recognizes the importance of electric reliability and encourages system-operating personnel to maintain and expand their professional knowledge. NERC also recognizes the need to track such efforts in support of maintaining NERC BPS operating personnel credentials as defined in the *System Operator Certification Program Manual*¹. Credentialing differs significantly in scope and specificity from licensing and qualification. The Credential Maintenance Program provides a framework for the development and tracking of high-quality learning activities that qualify for credential maintenance through continuing education hours (CEH) in support of NERC Certified System Operator (NCSO) credential maintenance requirements.

1.1 Purpose and Objectives

- Provide an overview of the scope and purpose of the Credential Maintenance Program
- Describe the requirements and responsibilities to meet the program's objectives:
 - Becoming a continuing education (CE) provider
 - Renewing or changing CE provider status
 - Constructing and submitting CEH eligible learning activities for approval
 - Provider and NERC approved learning activity audit processes
 - Reviewing and addressing disputes

¹ <u>https://www.nerc.com/pa/Train/SysOpCert/System%20Operator%20Certification%20DL/SOC_Program_Manual_v4.pdf</u>

NERC's Credential Maintenance Program consists of criteria for planned educational activities intended to further develop and train BPS operating personnel and to enhance the knowledge and skills required for the reliable operation of the Bulk Electric System (BES) within North America.

2.1 Purpose and Objectives

The main purpose of the NERC Credential Maintenance Program is to establish criteria that promote high quality and up-to-date learning activities for BPS operating personnel. Fulfilling these objectives ensures that BPS operating personnel working in North America:

- Are trained, equipped, and prepared to maintain electric reliability
- Engage in meaningful structured learning activities to maintain their NERC certification credentials

The objectives of the NERC Credential Maintenance Program are as follows:

- Ensure CEH-eligible learning activities meet program criteria
- Provide guidance to training organizations on the development, implementation, and continuous improvement of learning activities
- Ensure BPS operating personnel engage in approved learning activities
- Encourage and promote the use of best practices for the overall enhancement of system operating personnel and electric reliability in North America

2.2 Scope

The NERC Credential Maintenance Program focuses on the training and educational needs of BPS operating personnel and may include a wide range of topics and activities. These learning activities may come from a variety of sources, including professional association seminars, vendor-sponsored technical workshops, and company-specific training and other such activities. In each instance, CE providers may only award CEHs for learning activities submitted to, and approved by, NERC.

This approval is contingent on meeting the requirements specified in this manual along with the topical requirements outlined in the NERC *System Operator Certification Manual*.²

2.3 Governance

The Personnel Certification Governance Committee (PCGC) determines the content to be used in system operator (SO) credential maintenance. This content is defined in the *System Operator Certification Manual*, Appendix A–Recognized Operator Training Topics. This manual is located on the NERC System Operator One-Stop Shop webpage³.

The Credential Maintenance Working Group (CMWG) works with the PCGC to determine the process for reviewing and approving if a learning activity meets the Credential Maintenance Program criteria and can be approved for CEHs. The CMWG serves as the governing body of the NERC Credential Maintenance Program. As such, the working group establishes policies, provides input on fees for CE providers and learning activities, and monitors the performance of the Credential Maintenance Program.

² <u>https://www.nerc.com/pa/Train/SysOpCert/System%20Operator%20Certification%20DL/SOC_Program_Manual_v4.pdf</u>

³ <u>http://www.nerc.com/pa/Train/SysOpCert/Pages/SOOneStopShop.aspx</u>

Members of the CMWG appoint nominees to serve as reviewers on the Continuing Education Review Panel (CERP). Once the reviewers are trained on the Credential Maintenance Program processes, they assist the administrator of the Credential Maintenance Program as follows:

- Reviewing and evaluating applications submitted by the providers of learning activities
- Auditing approved learning activities

2.4 Administration

NERC staff administers the Credential Maintenance Program; collects fees; maintains databases, records, and applications; and reports to the CMWG on the activities of CERP and the performance of the approved CE providers.

As the administrator, NERC staff works with the CMWG to establish clear and concise requirements for approved learning activities, processes, and procedures that enable system-operating personnel to use their CEHs to maintain their NERC Certification credentials.

2.5 Funding

The program is funded through user fees. Refer to the fee schedule posted on the NERC web site for specific fees.⁴

⁴ https://www.nerc.com/pa/Train/SysOpCert/System Operator Certification DL/CM_Program_Fee_Schedule_2020.pdf

Chapter 3: Continuing Education Providers

If approved, NERC, Regional Entities, operating and marketing entities (including those that employ BPS operating personnel), technical and industry societies and associations, consultants, vendors, colleges, universities, and training companies can become CE providers.

Refer to the reference videos and/or user guide for systematic instructions on applying to become a provider. These resources are available on the System Operators Certification and Credential Maintenance Program One-Stop Shop.⁵

3.1 Obtaining CE Provider Status

The NERC Credential Maintenance Program recognizes three roles:

- 1. Level 1 Transcript Reviewer⁶
 - a. Has a 12-month renewable term
 - b. May only review transcripts to which a SO has granted them access
 - c. May not submit courses or upload course information to operator transcripts
- 2. Level 2 CE Provider
 - a. Has a 12-month renewable term
 - b. Must have individual learning activities (ILA) approved prior to the first delivery:
 - i. Reviewed by CERP members outside of their organization
 - ii. Approved by NERC
 - c. Must upload completion transcripts to System Operator Certification Continuing Education Database (SOCCED) within 60 days of a structured learning activity (SLA) completion
- 3. Level 3 CE Provider
 - a. Has a 36-month renewable term
 - b. Must submit ILAs for approval within 30 days of their corresponding first delivery:
 - i. Reviewed by CERP members outside of their organization
 - ii. Approved by NERC
 - c. Must upload completion transcripts to SOCCED within 60 days of a SLA completion or ILA approval, whichever is later

Level 1 Transcript Reviewer

To obtain a Level 1 Transcript Reviewer status, applicants must perform the following:

- 1. Complete and submit a provider application
- 2. Submit the corresponding (non-refundable) provider fee through SOCCED
- 3. Receive approval from the CE administrator
- 4. Validate applicant information accuracy in SOCCED
- 5. Agree to comply with the requirements set forth in this manual

⁵ https://www.nerc.com/pa/Train/SysOpCert/Pages/SOOneStopShop.aspx

⁶ While referred to as a Level 1 provider, the Level 1 provider may not submit ILA applications nor award CEHs for any course completions within SOCCED.

Level 2 CE Provider

To obtain Level 2 provider status, applicants must perform the following:

- 1. Complete and submit a provider application
- 2. Submit the corresponding (non-refundable) provider fee through SOCCED
- 3. Satisfactorily complete an interview with a provider task force:
 - a. A member of the CMWG
 - b. A member of the CERP
 - c. The CE administrator
- 4. If not approved:
 - a. Wait no less than 42 calendar days from the date of decision prior to:
 - i. Reapplying to become a Level 2 provider
 - ii. Submitting the corresponding (non-refundable) provider fee through SOCCED
- 5. If approved:
 - a. Validate applicant information accuracy in SOCCED
 - b. Agree to comply with the requirements set forth in this manual

Level 3 CE Provider

To obtain Level 3 provider status, applicants must qualify as follows:

- 1. Be a current approved Level 2 provider for no less than 12 consecutive months with three active courses in SOCCED at the time of application
- 2. Complete and submit a provider application
- 3. Submit the corresponding (non-refundable) provider fee through SOCCED
- 4. Satisfactorily complete an interview with a provider task force:
 - a. A member of CMWG
 - b. A member of CERP
 - c. The CE administrator
- 5. If not approved:
 - a. If requested, the provider task force, with concurrence from the CMWG chair and vice chair, may transition the Level 3 provider application to a Level 2 provider renewal (subject to the corresponding requirements) for no additional fee
 - b. Wait no less than 42 calendar days from the date of decision prior to:
 - i. Reapplying to become a Level 3 provider
 - ii. Submitting the corresponding (non-refundable) provider fee through SOCCED
- 6. If approved:
 - a. Validate applicant information accuracy in SOCCED
 - b. Agree to comply with the requirements set forth in this manual

3.2 Renewing CE Provider Status

- 1. CE providers may renew their provider status by performing and ensuring the following:
 - a. Submitting a notice of renewal 60 days prior to the expiration date of their term:
 - i. Level 1 providers may renew their Level 1 provider status every 12 months
 - ii. Level 2 providers may renew their Level 2 provider status every 12 months
 - (1) Level 2 providers may elect to renew as a Level 1 provider
 - iii. Level 3 providers may renew their Level 3 provider status every 36 months:
 - (1) Level 3 providers may elect to renew as a Level 1 or Level 2 provider
 - b. Submitting the corresponding (non-refundable) provider renewal fee through SOCCED
 - c. Having the following minimum number of active ILAs at the time of renewal notice submittal
 - i. Any provider renewing as a Level 1 provider- Not Applicable
 - ii. Level 2 provider renewing as a Level 2 provider One active ILA
 - iii. Level 3 provider renewing as a Level 2 provider One active ILA
 - iv. Level 3 provider renewing as a Level 3 provider Three active ILAs
 - d. For Level 2 and Level 3 providers only, satisfactorily completing at least one routine audit within the 12 month period preceding the provider's term expiration date
 - e. Obtaining approval from the CE administrator
 - f. Validating the accuracy of applicant information in SOCCED
- 2. Level 2 and Level 3 providers who do not renew prior to their expiration have a 90-day grace period to complete the renewal process
 - a. During the 90-day grace period, providers are placed in a suspended status
 - b. Corresponding providers are not permitted to submit or renew ILAs while in suspended status
 - c. If the provider successfully completes the renewal process during the grace period, the renewed provider term begins as of the provider's previous expiration date
- 3. Any provider that does not successfully complete the renewal process in the allotted time will go into expired status and will need to reapply to become a provider

3.3 CE Provider Responsibilities

- 1. Level 1 providers must:
 - a. Have access granted to them by the SOs whose transcript(s) they wish to review
 - b. Adhere to the requirements outlined in this manual
- 2. Level 2 and Level 3 providers must:
 - a. Adhere to the learning activity requirements outlined in this manual
 - b. Maintain all auditable records for a period of no less than four years. See **Chapter 8: Credential Maintenance Program Audits** for more information.
 - c. Ensure all contact information in SOCCED is current and accurate

- d. Comply with audit requests within 45 calendar days of audit notice
- e. Meet the following ILA application requirements:
 - Note: Only approved Level 2 and Level 3 CE providers may submit an ILA for approval
 - i. CE providers are accountable for all requirements associated with corresponding ILAs submitted for approval
 - ii. CE providers may not delegate or otherwise transfer their CE provider status
 - iii. CEHs may only be awarded for completion of a learning activity with an approved ILA
 - iv. Level 2 providers must perform the following:
 - (1) Submit an ILA at least 45 days prior to the first scheduled learning activity delivery
 - (a) When required, provide requested clarifications or corrections within five days of notification
 - (b) Failing to provide timely clarifications or corrections within five days of notification may result in the following:
 - (i) ILA rejection
 - (ii) Require the first scheduled delivery to be postponed
 - v. Receive ILA approval prior to the first delivery in order to award CEHs for successful learning activity completion
 - vi. Upload completion transcripts to SOCCED within 60 days of learning activity completion
 - vii. Level 3 providers must perform the following:
 - (1) Submit an ILA no more than 30 days from the date of first delivery
 - (a) When required, provide requested clarifications or corrections within five days of notification
 - (b) Failure to provide timely clarifications or correction within five days of notification may result in ILA rejection
 - (2) Upload completion transcripts to SOCCED within 60 days of course completion or ILA approval, whichever is later
 - (a) ILA applications must be approved prior to awarding CEHs in SOCCED
- 3. Failing to adhere to these requirements may result in the following:
 - a. The CE provider's inability to award CEHs for course completion
 - b. A provider investigative audit

Chapter 4: Continuing Education Learning Activities

The Credential Maintenance Program recognizes many types of learning activities that meet the criteria for CEHs. In each case, learning activities must conform to all Credential Maintenance Program criteria, including the recognized operator training topics found in the *System Operator Certification Program Manual*, Appendix A⁷.

4.1 Learning Activity Requirements

- 1. A learning activity, whether synchronous or asynchronous, designed and developed for the purpose of awarding CEHs, contains the following attributes:
 - a. Undergoes a documented review and approval process to ensure quality and applicability
 - b. Identifies applicable prerequisites
 - c. Has learning objectives that are specific and relevant
 - d. Prescribes the content used to meet learning objectives
 - e. Utilizes one or more specific instructional methods and settings
 - f. Follows a pre-established process or sequence
 - g. Has a known or set period of time needed for content delivery based on the guidelines of this manual and as determined by an approved provider
 - h. Imparts, maintains, or enhances learner knowledge, skills, or abilities
 - i. Assesses learners to indicate whether learning objectives have either been met or not met with reasonable assurance

4.2 Continuing Education Hours

- 1. To award CEHs, a learning activity must be approved through NERC's ILA process
- CEHs are awarded for the instruction, facilitation, design and development⁸ ⁹, or successful completion of learning activities with durations greater than or equal to 60 minutes (1 CEH) and in 30-minute increments (0.5 CEH) thereafter
 - a. Periods consisting of strictly travel time or in the performance of actual operational activities may not be included in CEH calculations
 - b. Breaks do not need to be subtracted from the number of CEHs awarded for any learning activity provided they are constrained to an average of 10 minutes per awarded CEH or a ratio thereof
 - i. It is assumed that learning segment times listed on the ILA include allowable breaks, unless otherwise specified
 - c. Up to 30 minutes of the time needed for learners to complete an assessment may be included in the number of CEHs awarded provided the following criteria are met:

⁷ <u>https://www.nerc.com/pa/Train/SysOpCert/System%20Operator%20Certification%20DL/SOC_Program_Manual_v4.pdf</u>

⁸ In alignment with the *System Operator Certification Program Manual*, the following conditions apply in order to receive CEHs for instruction, facilitation, or design and development of a learning activity: Instruction – Must serve as an instructor for the entire delivery of the learning activity (or corresponding segment(s) delineated for partial credit); Facilitation – Must serve as a course facilitator for the entire delivery of the learning activity (or corresponding segment(s) delineated for partial credit); Design and development – Must design and develop the entire learning activity delivered (or corresponding segment(s) delineated for partial credit) inclusive of any corresponding assessment

⁹ Individuals eligible to receive CEHs for the instruction, facilitation, or design and development of a learning activity (or corresponding segment(s) delineated for partial credit) are not required to complete corresponding assessment(s)

- i. The assessment is strictly related to the associated content
- ii. The assessment is part of the learning cycle (example: exam followed by an exam review)
- iii. The assessment (or subsequent review thereof) is not utilized to meet the minimum duration requirement of the learning activity
- d. When an assessment is inherent to the learning activity (i.e., simulations, student exercises, and the like) the time needed to complete the assessment may be included in the number of CEHs awarded, in its entirety, provided the following criteria are met:
 - i. The assessment is used to evaluate skills and/or knowledge associated with learning objective content concurrently with training
 - ii. Learners are actively engaged throughout the duration of the learning activity
- e. Determine partial credit CEHs for learning activities as follows:
 - i. Partial credit may be awarded for a segment or segments of a learning activity that are satisfactorily completed provided that the corresponding segment or combination of segments:
 - (1) Fully meets the criteria of a learning activity as outlined in this manual
 - (2) Clearly delineated as such in the corresponding ILA, inclusive of how it will be assessed
 - (3) Accounts for at least 1 CEH
- 3. CEH Categories or Types:
 - a. SO credential maintenance must contain a specific number of CEHs as described in the System Operator Certification Program Manual ¹⁰ on the System Operators Certification and Credential Maintenance Program web page¹¹

4.3 Credential Maintenance Program Training Administration

- 1. Providers are required to ensure the following:
 - a. Each learning activity has a corresponding lesson plan with sufficient detail to ensure the following for each delivery:
 - i. Content is consistently and adequately presented and/or covered
 - ii. Learning objectives are assessed consistently and adequately
 - b. Each lesson plan undergoes the following documented review and approval process:
 - i. Quality
 - (1) Content accuracy
 - (2) Instructional method
 - ii. Applicability
 - (1) Instructional value for the target audience
 - (2) Supports credential maintenance
 - c. Training personnel (as a whole) are knowledgeable and competent (through education and/or experience) in the following areas (as applicable and to the extent necessary) for each learning activity:

¹⁰ <u>hhttps://www.nerc.com/pa/Train/SysOpCert/System%20Operator%20Certification%20DL/SOC Program Manual v4.pdf</u> ¹¹ https://www.nerc.com/pa/Train/SysOpCert/Pages/SOOneStopShop.aspx

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- i. Subject area and training content
- ii. Adult learning principles and practices
- iii. Instructional design and development
- iv. Instructional technology
- v. eLearning authoring
- vi. Training delivery
- vii. Assessment administration
- viii. Remediation activities
- ix. Training program administration
- d. Access to and support for the learning environments required by learning activities they provide
- e. Timely compliance with Credential Maintenance Program submission requirements, including:
 - i. ILA Forms submitted to SOCCED for approval within the prescribed time frame
 - ii. Training completions must be accurate and uploaded to SOCCED within the prescribed time frame
- f. Training is evaluated for quality, relevance, and effectiveness improvement by the following:
 - i. Soliciting feedback from students, training personnel, and management (as applicable)
 - ii. Taking measures to address assessment results, student and training personnel feedback, management observations, and applicable performance measures (when available)
- g. Completion confirmation is made available to any individual who has satisfactorily completed a corresponding learning activity upon request
- h. Completion records for a learning activity is provided upon request
- i. Adherence to all of the requirements in this manual is fulfilled

Chapter 5: Submitting Individual Learning Activity Applications

5.1 The ILA Form

- 1. When applying for NERC approval, data must be submitted through SOCCED and must include the following:
 - a. A completed ILA application with particular emphasis on the following:
 - i. Include a detailed description of each learning activity segment, including the instructional method(s) and materials that will be used in the segment delivery
 - (1) The description must contain sufficient detail to determine if the learning objectives can be met
 - (2) The description must describe how the content supports the BES reliability responsibilities of the system operator
 - ii. Any ILA segment(s) that will be used to award Reliability Standards hours must comply with the following:
 - (1) Reference Reliability Standards that are "approved" or are already "in effect"
 - (2) Clearly convey how Reliability Standards will be incorporated into the course
 - iii. The identification of the applicable Appendix A course topic(s) when the ILA identifies the course as an emergency operations related training topic¹²
 - b. Applicable fees
- 2. Providers must complete an ILA application for all learning activities for which CEHs are requested
- Instructions for completing an ILA application can be found in the resources section of the One-Stop Shop (System Operators Certification and Credential Maintenance Program)¹³
- 4. All courses submitted will be evaluated against the Credential Maintenance Program criteria and System Operator Certification Program criteria
- 5. Courses identified as not meeting program criteria will be evaluated by utilizing a multilayer review process prior to denying approval
- 6. Once approved, any substantive changes to the corresponding learning activity will require a new ILA

5.2 Renewal of ILAs

- 1. Requirements for the renewal of ILAs are as follows:
 - a. Each ILA is approved for one calendaryear
 - b. SOCCED will allow renewals up to 90 days before a learning activity's expiration date
 - c. If an ILA is submitted outside of this time frame, the provider must submit it as a new learning activity
 - d. Providers are expected to update learning activities to reflect changes, such as Reliability Standards and regional or local procedures
 - e. To qualify for renewal, a learning activity must be free of substantive changes from the original submission
- 2. Automated renewal notification emails will be sent to providers 90 calendar days and 30 calendar days prior to expiration

¹² Reference the Program Rules in the <u>System Operator Certification Program Manual</u>.

¹³ https://www.nerc.com/pa/Train/SysOpCert/Pages/SOOneStopShop.aspx

3. Renewal requests for courses are reviewed and evaluated against the program criteria in the same manner as a new course request

5.3 Substantive Changes

- 1. A substantive change exists when the following apply:
 - a. One or more of the learning objectives has been revised such that it no longer coincides with those submitted within the original ILA (excludes minor editorial changes)
 - b. Partial attendance provisions have changed
 - c. Content has been modified from that of the original ILA to the extent that one or more objectives require revision (excludes use of new or more current data or reference material)
 - d. The delivery method has been modified from the original ILA (e.g., from a classroom to a simulated drill)
 - e. The method of trainee assessment has been changed from cognitive to performance or vice versa
 - f. The duration of the learning activity, or a segment of the learning activity, has been changed to the extent that it warrants a different total number of CEHs awarded to a participating individual (applies to both full and partial credit)

6.1 Course Approval

- 1. Once submitted, an ILA can have the following actions:
 - a. Withdrawn
 - i. Courses may only be withdrawn up until the point they are assigned to a CERP reviewer for evaluation
 - ii. Applicable fees may be refunded
 - b. Approved
 - c. Denied
 - i. Reviewers will initially work with providers to revise or correct ILA applications (a reviewer may recommend that the course undergo further review)
 - ii. Courses identified as not meeting program criteria will be evaluated in a multilayer review process prior to denying approval
 - iii. Fees may not be refundable
- 2. Notification from NERC regarding course status:
 - a. NERC will provide notice to applicants about the approval or rejection of applications. The notice, as well as any additional information, will be sent to the provider's course contact person using the email address provided in SOCCED.

6.2 Awarding of CEHs

- 1. All CEHs are reported to NERC via SOCCED
- 2. CEHs are awarded for satisfactory and eligible course completions occurring during the period in which a corresponding ILA is in approved status
- 3. For instructions on how to upload course completion to SO transcripts, refer to the reference materials available in the System Operator Certification and Credential Maintenance One-Stop Shop¹⁴

¹⁴ <u>https://www.nerc.com/pa/Train/SysOpCert/Pages/SOOneStopShop.aspx</u>

Chapter 7: Continuing Education Review Panel

CERP is comprised of CMWG approved industry professionals who have the necessary experience, skill, and knowledge to review and recommend the approval or rejection of ILAs, work constructively with providers to resolve ILA discrepancies, and play an active role in the audit process (with certain exceptions). Members of the CMWG may take on CERP member roles and responsibilities as necessary and at the discretion of CMWG officers in coordination with the CE administrator.

7.1 Continuing Education Review Panel

- 1. To become a CERP member, a candidate must do the following:
 - a. Submit a CERP member nomination form to the CMWG
 - b. Successfully complete prerequisite training as outlined by the CMWG
 - c. Participate in at least one provider audit
 - d. Independently review five ILAs and correctly recommend each for approval/disapproval (ILAs recommended for approval/disapproval must receive concurrence from a current CMWG member)
 - e. Receive final approval from the CMWG
- 2. To remain an active CERP member, the member must do the following:
 - a. Attend a yearly CMWG update meeting
 - b. Review and disposition all assigned ILAs unless otherwise excused by CMWG officers with concurrence from the CE administrator
 - c. Participate in audits as assigned unless otherwise excused by CMWG officers with concurrence from the CE administrator
 - d. Review and disposition at least 5 ILAs or participate in at least 3 routine audits per calendar year, beginning the first full year of CERP membership.

7.2 CERP Member Limitations

- 1. A CERP member will NOT engage in any CE provider audit where the following exist:
 - a. A perceived or actual conflict of interest
 - b. A contractual relationship between the CERP employer/entity and the provider entity
- 2. Active CERP membership levels are maintained at the discretion of the NERC CMWG based on the following:
 - a. The number of existing CERP members
 - b. The rate at which ILAs are submitted
- 3. CERP membership may be revoked at the discretion of the CMWG

7.3 CERP Course Review and Approval Process

- 1. The administrator will create a provider reviewer account in SOCCED for each CERP member
- 2. CERP members shall maintain their provider reviewer accounts in SOCCED ensuring their contact information is kept current
- 3. CERP members review ILA applications assigned by the CE administrator

- 4. When reviewing learning activity submissions, CERP is committed to following the guidelines established by the CMWG:
 - a. CERP members have a maximum of 15 days to complete each ILA review
 - b. CERP members will work with providers to the extent possible to resolve any discrepancies
 - c. After reviewing an ILA, CERP members submit a recommendation to approve or reject the ILA to the CE administrator
 - d. ILAs recommended for rejection will be evaluated in a multi-layer review process before denying approval; see Chapter 9: Dispute Resolution

7.4 Reporting to the CMWG

- 1. CERP reports to the CMWG
- 2. NERC management will appoint a member of NERC staff to facilitate CERP activities and to report CERP activities to the CMWG
- 3. CERP's deliberations regarding learning activities will be kept confidential except in the following cases:
 - a. Legal review is needed by NERC counsel
 - b. A provider has requested that its information or learning activity be made available to other entities
 - c. Approved confidential minutes of closed CERP meetings shall be available to the CMWG, PCGC, the Board of Trustees (Board), and NERC staff involved in personnel certification and credential maintenance

Chapter 8: Credential Maintenance Program Audits

The Credential Maintenance Program requires all providers to demonstrate that their SO credential maintenance SLAs continue to conform to the criteria set forth in this administrative manual. Audits are conducted on a routine basis to ensure that all CE providers adhere to the Credential Maintenance Program's criteria. This chapter discusses key elements of the audit process. Refer to the resources posted on the System Operators Certification and Credential Maintenance Program web page¹⁵ for additional information.

8.1 Types of Audits

- 1. Two types of audits are used to provide reasonable assurance that CE providers, inclusive of the corresponding learning activities they administer, are adhering to the requirements outlined in this manual:
 - a. Routine Audit
 - i. May be initiated at any time and frequency such that a CE provider is audited according to the following:
 - (1) At least once during a given CE provider cycle
 - (2) Within 12 months prior to CE provider renewal
 - ii. The scope of the audit is confined to the requirements pertaining to the following:
 - (1) Current CE provider renewal cycle
 - (2) CE provider level
 - (3) Approved *Credential Maintenance Program Manual*¹⁶ revision requirements corresponding to the requested evidence
 - b. Investigative Audit
 - i. May be initiated at any time and frequency as determined by CMWG
 - ii. Reasons for an investigative audit may include, but are not limited to, any one or more of the following:
 - (1) A credible complaint against a provider pertaining to the requirements outlined in this manual
 - (2) Unsatisfactory performance during a routine audit
 - (3) Failure to comply with a routine audit document request within the time allotted
 - iii. The scope of the audit is confined to the requirements pertaining to the following:
 - (1) CE provider level
 - (2) Approved Credential Maintenance Program manual revision requirements corresponding to the requested evidence

8.2 Audit Personnel

- 1. Routine audits are conducted by one or more members of the CMWG and/or CERP
- 2. Investigative audits are conducted by a team comprised of the following personnel:

¹⁵ <u>http://www.nerc.com/pa/Train/SysOpCert/Pages/default.aspx</u>

https://www.nerc.com/pa/Train/SysOpCert/System%20Operator%20Certification%20DL/Credential%20Maintenance%20Program%20Admini strative%20Manual%20v1.0.pdf

- a. A CMWG officer
- b. Select CMWG members

8.3 Audit Notice and Subsequent Requirements

- 1. NERC notifies CE providers of audits utilizing applicable contact information:
 - a. This notification shall contain the following:
 - i. Type and reason for the audit
 - ii. Evidence needed to perform the audit
- 2. CE providers must provide the requested evidence within 45 days of notification via SOCCED unless extended by the CMWG officers in coordination with the CE administrator:
 - a. For routine audits, the requested evidence will include the following items at a minimum:
 - i. Materials corresponding to selected learning activities, provided such materials may be openly disclosed (e.g., with CEII, confidential, sensitive material redacted) and can be reasonably transmitted electronically, inclusive of the following:
 - (1) Lesson plan(s)
 - (2) Any associated material(s) used during delivery
 - (3) A sample of the assessment(s):
 - (a) When a learning activity contains segments that are eligible for partial credit, the extent of materials requested may be limited to one or more partial-credit segments at the discretion of the audit team.
 - ii. A summary of the review and approval process for the corresponding lesson plans audited
 - iii. A summary of how training personnel involved in the learning activity audited possessed the knowledge and competencies necessary as described in this manual (as applicable)
 - iv. Training records consisting of the following for each person who completed the corresponding learning activity (for a given time frame or delivery at the discretion of the audit team)¹⁷:
 - (1) Full name
 - (2) Attendance date(s)
 - (3) NERC certification number(s)
 - (4) Assessment result(s)
 - (5) CEHs awarded
 - v. A sample of how learning activity evaluations are used to improve training quality, relevance, and effectiveness since the previous audit or renewal period (whichever is later)¹⁸:
 - (1) Examples of student, training personnel, and management (as applicable) feedback and/or observations received
 - (2) Summaries of learning activity feedback and/or observations have been dispositioned (inclusive of the measures taken)

 ¹⁷ If the learning activity selected for audit has not been completed by an NCSO at the time of audit, a sample training record would be sufficient.
¹⁸ Learning activity evaluation summaries need not be constrained to the learning activity selected for audit.

- b. For investigative audits, additional evidence may be requested above and beyond that of a routine audit to the extent necessary to do the following:
 - i. Sufficiently investigate the cause(s)
 - ii. Arrive at a valid conclusion
- c. Additionally, the CE provider's ability to continue to submit ILAs during investigative audits will be at the discretion of the CMWG officers and communicated to the CE provider accordingly

8.4 Audit Results

- 1. CE providers are informed of satisfactory or unsatisfactory results within the following time frames provided that audit evidence is received within the allotted time:
 - a. Routine audits: 21 days from the receipt of requested evidence
 - b. Investigative audits: 45 days from the receipt of requested evidence
- 2. If audit evidence is not received within the allotted time, the CMWG officers (in coordination with the CE administrator) will attempt to contact the affected CE provider to determine if an extension is needed
- 3. If no audit evidence is received with the allotted time, inclusive of any extensions (when applicable), the audit result will be unsatisfactory

8.5 Unsatisfactory Audit Results

- 1. Unsatisfactory routine audit results may result in corrective action(s) up to and including an investigative audit as determined by the CMWG in coordination with the CE administrator
- 2. Unsatisfactory investigative audit results may result in corrective action(s) up to and including permanent revocation of the CE provider as determined by the CMWG in coordination with the CE administrator

Chapter 9: Dispute Resolution

In accordance with Rules of Procedure Section 902¹⁹, this chapter describes the "multi-layer review process for disputer application reviews, interpretations of guideline and standards, probation or suspension of NERC-approved provider status, and CEH disputes."

9.1 Submission of a Dispute

- 1. Any disputes regarding the contents of this manual must be submitted in writing to the CE administrator
- 2. The CE administrator will forward the dispute to CMWG officers for consideration and deliberation

9.2 Consideration and Deliberation of a Dispute

- 1. The CMWG officers will review and make every effort to resolve the dispute
- 2. When CMWG officers are unable to resolve the dispute or if further review and deliberation is required, then the CMWG officers will construct a dispute task force consisting of the following personnel within 45 days of dispute receipt:
 - a. CMWG officers
 - b. PCGC officers
 - c. The CE administrator
 - d. Select CMWG members
 - e. NERC legal and support staff (as applicable)
- 3. The dispute task force will review and deliberate the dispute:
 - a. This deliberation of the dispute will be kept confidential except in the following cases:
 - i. NERC counsel needs a legal review
 - ii. The provider has requested that the dispute be made available to other entities
 - iii. There are required updates to the CMWG, PCGC, the Board, and NERC staff involved in personnel certification and credential maintenance

9.3 Dispute Response

- 1. For disputes that can be resolved by CMWG officers, the following will take place:
 - a. The resolution outcome will be documented and made available to the individual or entity submitting the dispute within 60 days of resolution
- 2. For disputes that require a dispute task force, the following will take place:
 - a. The dispute task force will deliberate and determine the dispute outcome within 60 days of formation
 - b. The resolution outcome will be documented and made available to the individual or entity submitting the dispute within 60 days of the dispute task force determination
- 3. The CMWG is the governing body of the Credential Maintenance Program and all determinations are final

¹⁹ <u>https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx</u>

	Table A.1: Credential Maintenance Program Manual Version History						
No.	Date	Section	Page	Description	Version		
1	6/1/2022	All	All	Personnel Certification Governance Committee approved Credential Maintenance Administration Manual version 1.0 to go into effect January 1, 2023 NOTE: The previous <i>Continuing Education Program</i> <i>Manual</i> will be superseded/replaced by this <i>Credential Maintenance Program Manual</i> version 1.0.	1.0		
2 1/1/202		3.2	6	Clarified the approval process for Provider renewals and the language associated with Provider suspensions.			
		4.2	8	Clarified how break time is accounted for during ILA reviews.			
		5.1	11	Clarified the expectation for learning activity segment descriptions, to match language in SOCCED.			
	1/1/2024	6.2	13	Clarified the process for awarding CEHs.	1.1		
		7.1	14	Modified the CERP requirements to include participation in routine audits.			
		8.3	17	Clarified the documentation requirements for routine audits.			
		Multiple	Multiple	Minor formatting updates and naming convention consistency changes made throughout.			