



Connecticut Chapter of the American Planning Association

March 20, 2007

Ms. Sue Schwartz, FAICP, President
American Institute of Certified Planners
American Planning Association
122 S. Michigan Ave., Suite 1600
Chicago, IL 60603

Re: AICP Certification Maintenance Program, February Revisions:
Comments of Connecticut Chapter, APA

Dear Ms. Schwartz:

The Connecticut Chapter of the American Planning Association appreciates this further opportunity to comment on the issue of AICP Certification Maintenance (“CM”), this time in response to the revised CM program released by the AICP Commission (the “Commission”) last month. The Chapter understands that the Commission received over 1000 comments, and appreciates the difficult job facing it in developing a CM program that meets the diverse needs of planners nationwide. We especially appreciate the efforts that the Commission has made to address the specific comments that the Connecticut Chapter presented in our January 8, 2007 letter.

As we did in connection with the January 8 letter, the Connecticut Chapter once again solicited feedback from its membership concerning the revised CM program. Although we had a more limited response from our membership, we used that feedback, and feedback from a majority of our Executive Committee members, in developing this response to the amended program. Because members of the Executive Committee could not reach complete consensus on the comments contained herein, this letter should be considered a position endorsed by a majority of the Executive Committee members, and not a consensus of the entire Committee.

A. The Connecticut Chapter Reiterates the Positions Taken in its January 8, 2007 letter to the Commission

The Chapter has NOT altered its position on issues related to the Certification Maintenance Program as set down in its January 8, 2007 letter. The following comments constitute a specific response to the revised program, but should be viewed as further supporting our position.

B. Proposed Program Credits / Program Phase-in

The Chapter appreciates the response of the AICP Commission to the issue of the onerous amount of credits required to be earned for CM in the original proposal. Your reduction of the credits to a level comparable to the annual average for the current CPD program helps address that concern. Further, allowing planners to apply CPD credits earned after April 13, 2007 until the inception of the CM program helps to take some of the “sting” of meeting the strict requirements for the inaugural 2 years of the program.

C. The Chapter Believes that the Issue of Hardship Due to Financial or Time Constraints is Still Not Adequately Addressed

Despite the Commission’s obvious efforts to relax the original program requirement that 50% of credits be derived from APA sponsored or co-sponsored events, we continue to have a serious concern that the actions of the Commission do not go far enough to guarantee that planners will have access to a broad array of CM offerings that are frequent, convenient, and affordable for a planners who practice diverse planning roles.

1. Potential Costs to Chapters as Registered Educational Providers

We are particularly concerned that the Commission may have back-stepped somewhat from the original proposal by now including Chapters under the category of “educational providers”, and thus subject to registration both as a provider, and for its programs. Because the AICP Commission has not developed the details of the Program, nor intends to develop those details before it votes on the Program framework on April 13, 2007, we have been unable to determine if Chapters, now or in the future, will be saddled with a fee (as implied in one conversation with AICP staff). If the Connecticut Chapter will be subject to a fee, we have no ability to determine its magnitude. Further, we are concerned, based on the issue of program affordability because, most likely, we will be forced to pass on that fee to registrants. And as a potential educational provider registrant, the Chapter cannot gauge what criteria it must meet to qualify as an educational provider, because those criteria have not yet been developed.

2. Negative Effect of Requirement for Registration and Fee Assessed to Educational Providers who have been our Partners in the Education of CT Planners

The Commission will recall that we stated in our January 8, 2007 letter that Connecticut Planners are very much reliant on private educational providers - the vast majority of which are governmental entities and not-for-profits - to provide a diverse program of education. Thus, the Chapter is even more deeply concerned with APA’s proposed requirement that these non-APA educational providers register and pay a fee.

On the face of it, it would appear that APA has provided greater flexibility to planners to meet their CM requirements by allowing them to derive their credits from APA, APA-sponsored, APA-endorsed, and / or PAB graduate courses. However, upon further examination, the additional requirement that 30 of the 40 required CM credits be derived from registered educational providers erases any doubt in our minds that the programs available to planners after the imposition of these program requirements will be quite limited. We say this with considerable conviction, because we firmly believe that the imposition of registration and fee requirements on our governmental and not-for-profit providers will have a chilling effect – we believe that many will choose not to suffer the indignity of registration and, even more likely, will not be willing to pay a fee, because their sources of funding are fixed or otherwise limited.

Again, we are unable to advise our APA co-sponsors and future APA-endorsed partners as to what registration entails; what registration standards will apply; and what the magnitude of registration fees will be, and therefore, we cannot with great accuracy gauge the effects of these requirements on their willingness to continue as partners, although we are certain that the impacts will be substantial.

RECOMMENDATIONS

1. After great consideration, we believe that the Commission's decision to fund this program on the backs of the Chapters and private (especially governmental & non-profit) providers is a flaw in the proposed program that will severely limit the educational opportunities for planners under the CM Program due to anticipated attrition. We recommend that AICP explore an alternative way to fund this program, so that all educational providers (particularly non-profits and governmental entities) are treated as equal partners, and are given encouragement to partner with APA and its Chapters / Divisions.
2. As recommended in our January 8, 2007 letter, strongly consider pre-registering organizations which have missions similar to that of APA, and their programs, so that planners can have a greater variety of programs without the burden of additional fees.
3. As stated previously, if the Commission insists on registration, delegate the responsibility of registration to Chapters who have established relationships with these providers, without the imposition of a fee, and with clear standards provided by APA for such registration.
4. If the Commission is intent on approving only a framework for this Program, however imprudent that might be, we strongly suggest that the AICP staff be charged with delivering the final program to AICP for approval at a date certain, but also only after further review and comment by the membership.

D. Expand CM Credit Opportunities

In our January letter, the Chapter suggested that the Commission give more credit to planners who provide educational services to their Chapter, or at the regional or national level. Although APA has proposed some credit for courses presented, and for preparation time, we believe that the credits offered fall short of recognizing the contributions of these leaders. Further, their contributions have been capped and minimized by limiting their application to the category of “self-study”.

Although our Executive Committee members have not reached consensus on this point, the Commission should also be aware that there are some in our Chapter who believe that CM credit should be given to Chapter volunteers who dedicate countless hours to the Chapter.

Finally, a small, but dedicated, group of planners in the nation has accomplished what 98.5 % has not – that is, these planners have earned CPD Certificates, and there are more who have made substantial progress towards that goal. We would like to suggest that the Commission consider giving those individuals some credit in the first CM round for this accomplishment.

RECOMMENDATIONS

1. Expand credit offerings for planners who are unpaid educators / presenters;
2. Consider some credit for extraordinary Chapter volunteer service;
3. Consider credit for those planners who have active CPD Certificates.

E. Program Structure

The program, as designed by AICP, designates that nearly all administrative actions should be performed by AICP staff, thus requiring a considerable bureaucratic infrastructure to manage this program. While we have alluded to the overlooked roles of the Chapters in this program, we believe it deserves greater emphasis. Many of the tasks outlined in the program, such as registration of providers, qualification of programs, posting of programs, etc., can be performed by Chapters, IF AICP were to provide clear standards and guidelines for Chapters to follow. In fact, some of these tasks are duplicated in the present CPD Program, such as the screening of proposed programs for CPD approval. By delegating much of the administration of the program to the Chapters, AICP could avoid much of the administrative cost associated with a top-heavy bureaucratic structure. AICP’s responsibilities would then be reduced to auditing how well the Chapters adhere to the AICP’s guidelines, but AICP would still maintain the automated system of program and credit logging.

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F. Conclusion

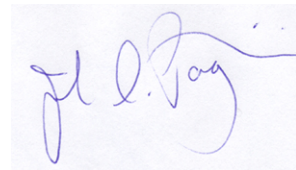
It is important for us to restate that the Connecticut Chapter is committed to assist the AICP Commission in devising a continuing education / certification maintenance program that is realistic, fair, and achievable relative to the competing demands of planners. We think it is expedient that the CM Program be thought out with enough care that the Commission has no doubt that the program will be managed efficiently by AICP; and will truly benefit a broad cross-section of certified planners, and the profession.

Thank you again for the opportunity to comment on this important matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Mark Pellegrini".

Mark Pellegrini, AICP
President, CCAPA

A handwritten signature in blue ink, appearing to read "John D. Pagini".

John D. Pagini, AICP
PDO, CCAPA

Cc: Paul Farmer, FAICP, Executive Director, AICP
Anna Breinich, AICP, AICP Commission, Region I