

March 20, 2007

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



Re: AICP Certification Maintenance – 2<sup>nd</sup> Draft  
Comments of New York Metro Chapter

Dear Ms. Schwartz:

The New York Metro Chapter of the American Planning Association appreciates the opportunity to provide the AICP Commission with its comments on the second draft of the AICP Certification Maintenance Program (CMP) proposal. The New York Metro Chapter solicited feedback from its membership concerning the CMP proposal, receiving over 150 responses; the Metro Chapter solicited general comments and also distributed a member survey. A summary of the general comments received by members is included as Attachment A; the results of the member survey are included as Attachment B.

Based on the feedback received from Metro Chapter members, a majority of the membership supports some form of mandatory certification maintenance (approximately 58%); however, a majority (61%) of the responding members are not in favor of the program currently being considered by the AICP Commission. The concerns of the New York Metro Chapter membership are as follows:

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1. The number of required credits (40 hrs/two years) is too onerous for planners to obtain in terms of both time and expense.
  - Many planners have limited organizational or personal resources, and limited time. Approximately 85% of survey respondents support a CMP requirement of less than 24 hours per two years; the majority of this 85% support a requirement of 12 hours or less per two-year cycle. Ms. Sue
  - The majority of members surveyed cited expense and time as major concerns with the current CMP proposal. Of those survey respondents not in favor of the current CMP proposal, 73% cite financial concerns and 78% cite the time necessary to fulfill the requirements as major objections to the current proposal.
  - Over 25% of respondents stated they would probably or definitely let their AICP lapse if the current CMP proposal becomes a requirement.

In order to make the CMP more compatible with the time and financial constraints of our membership, the Metro Chapter recommends that the AICP Commission consider reducing the number of CMP credit hours to 24/two year cycle.

2. The requirement that at least 50% of the 40 required credit hours be derived from APA, APA-sponsored programs, APA-endorsed programs, and PAB graduate courses adds to the financial burden placed on planners and fails to recognize the substantial role that private providers play in providing comprehensive and relevant education to planners with diverse educational needs.

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- The Commission's suggestion that the APA National Conference be a major component of each planner's credit log ignores the fact that most planners do not attend the National Conference because it is considered to be cost prohibitive, they are unable to get the time off to attend, or it is perceived as not relevant to their continuing education needs.
- If national programs continue to be inaccessible to the membership, then the responsibility to provide at least 50% of the required credit hours falls to the Chapters, with Chapters also responsible for ensuring that enough additional non-APA-sponsored or endorsed programs are available to meet the other 50% of required credit hours; these requirements place an unnecessary burden on the individual Chapters.
- 63% of survey respondents believe that more credit hours should come from "other providers."
- Many members believe that credits earned to maintain other professional certifications (AIA, P.E., CLE, etc.) should count towards the CMP.
- 49% of survey respondents would like "Self-Guided Study" to represent a larger percentage of the required credit hours.

We recommend that the Commission consider reducing the number of hours derived from APA, APA-sponsored programs, APA-endorsed programs, and PAB graduate courses to no more than 40%. Increasing the number of hours obtained from "other providers" and "Self-Guided Study" will provide members with the flexibility to fulfill the CMP requirements while also participating in educational programs that meet their diverse educational needs.

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3. "Self-Guided Study" credit should be given to paid presenters, including adjunct professors, and those participating in mentoring activities and APA leadership activities.
  - Paid instructors should earn credit hours for both preparation and in class time for programs that count for CMP credits.
  - Paid instructors teaching classes at an accredited planning school should also earn CMP credits for preparation and in class instruction time.
  - Hours spent by those participating in APA leadership activities, including executive committees and/or sub-committees, should qualify for CMP credit hours.
  - 32% of survey respondents believe mentoring activities should count for CMP credit. AICP should consider adding mentoring activities to the list of qualified activities eligible for "Self-Guided Study" credits.
  
4. The requirement that educational providers register with National APA/AICP in order to become qualified professional development providers and pay a fee if they are not offering their training for free, fails to recognize the fact that these organizations currently provide a service to planner's by providing courses that meet the diverse educational needs of Chapter members.

These educational providers should be encouraged to continue offering programs rather than asked to incur a financial and administrative burden. The New York Metro Chapter believes that requiring National APA registration and approval sends the wrong message to these important educational providers/partners and may ultimately act as a disincentive to their continued participation.

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We recommend that the Commission not require "Other Providers" to register with AICP or pay fees. Further, if AICP believes that "Other Providers" need to be qualified, we recommend that this task be delegated to the Chapter PDO, based on qualifying criteria provided by AICP, and without the need for a fee.

5. The proposed implementation of the CMP from a voluntary program to a mandatory requirement by January 2008 places an administrative burden on APA and the Chapters.

Thank you again for providing the New York Metro Chapter with the opportunity to comment on the second draft of the CMP proposal. The Metro Chapter is committed to assisting the AICP Commission in establishing a CMP that meets the diverse needs of our membership and that is realistic and obtainable for all current and future AICP members.

Thanks in advance for your careful consideration of this matter.

Sincerely,

Sarah K. Yackel, AICP  
PDO, New York Metro Chapter

Cc: Ethel Sheffer, AICP, President, New York Metro

**ATTACHMENT A**  
**APA NY Metro Chapter – Summary of Member Comments on CMP Proposal**

NY METRO CHAPTER MEMBER	SUPPORT	DOES NOT SUPPORT	SUPPORT WITH MODIFICATIONS	OTHER ISSUES
1.		X		Equivalent to mandatory licensing – many professionals will let their memberships lapse; 40 hours/2 years is excessive; cost prohibitive; would hurt AICP members in rural communities; not enough courses are currently offered. If mandatory education is required should not exceed 6 credit hours per year. Needs to be sufficient number of free courses offered locally and online.
2.		X		New York City is large enough classroom to keep sharp professionally.
3.		X		Most courses are too basic for experienced planners; not worth the time.
4.			X – Volunteer work on governmental committees and governmental boards must be included, by not including this people may quit these committees/boards to meet ed requirements. Could hurt small local governments in the future.	Should be about what is in the best interest of the public, not how can more money be raised.
5.		X		I am retired. “I have no intention of complying with mandatory “continuing education” requirements. If I am no longer entitled to use “AICP” after my name, APA will no longer be entitled to my AICP dues.”
6.			X – Too many hours, credits obtained for legal certification maintenance should count for AICP maintenance.	Requirements too onerous for someone trying to maintain a dual certification (i.e. lawyer and AICP).
7.		X		By their very nature, planners stay current in meeting the needs of their clients and constituents. Individual responsibility to stay up-to-date.
8.		X		AICP certification is not needed to practice planning; certification maintenance (CM) imposes new work requirements on busy planners; CM represents a hidden dues and cost increase; CM will discourage new members from becoming certified; the spirit of CM is

NY METRO CHAPTER MEMBER	SUPPORT	DOES NOT SUPPORT	SUPPORT WITH MODIFICATIONS	OTHER ISSUES
				already covered by the Code of Ethics.
9.		X		
10.			X – Courses offered by other professional organizations (i.e. AIA) should count for credit. Chapters should join with other organizations to offer programs. This would help AICP members in multiple organizations.	
11.		X		Adoption of such requirements should require a majority vote of a quorum of all eligible AICP members.
12.			X – Less hours (24/2-yrs), too costly for municipal employees	Allowing credit for attendance at National conference seems like a way to push attendance at the conference – cost prohibitive for many AICP members.
13.		X		Requirements are too extreme; seems to be a revenue-generating proposal rather than truly professional development.
14.			X – Some courses/credits should overlap between the other professions requiring continuing education credits (i.e. landscape architecture)	
15.			X - Requiring 1/2 of all programs be through APA is too restrictive.	Program will increase stature of AICP certification. Need to offer diversity in accredited programs. Would like to see programs in environmental management and site design offered by University Extensions, etc.
16.			X – Requirements are too burdensome for those members with other certifications. Credits for other professional certifications (i.e. PE) should count towards AICP credits.	
17.		X		Too expensive for municipal employees; does not have faith that local chapter can offer regular, low-to-no cost educational programs. Since AICP/APA is not required for professional positions will be likely to cancel membership if this becomes a requirement.
18.			X – Program is worthwhile but should	

NY METRO CHAPTER MEMBER	SUPPORT	DOES NOT SUPPORT	SUPPORT WITH MODIFICATIONS	OTHER ISSUES
			be integrated with AIA and various PE programs and not rely solely on APA generated programs.	
19.	X			
20.	X			Proposal will make planning a more serious profession and keep working planners up to date on the latest trends in planning.
21.			X – 48 hours in 3 years.	
22.		X		No time to fit in the additional training; most programs are not truly educational, too many hours.
23.			X – Too many hours – 36 hours in 3 years; more credit should be given to teachers of programs; supports self study credits.	
24.			X – 36 hours in 3 years; make up credits and payment of past dues should be allowed rather than requiring the re-taking of the exam.	
25.			X – Specialized certification tracks should be offered	
26.			X – Program should be implemented in an incremental manner; paid instruction should qualify for credits.	
27.			X – Credits for volunteer service; more credit for paper preparation; excess credits should carry over.	
28.			X – Too many hours – 16 hrs/2 years; presenters and teachers should get education credit for preparation time.	
29.			X – Paid teachers should get same, if not more credit for teaching and prep	No economic incentive to maintain AICP certification (holding AICP has no economic value). Program may

NY METRO CHAPTER MEMBER	SUPPORT	DOES NOT SUPPORT	SUPPORT WITH MODIFICATIONS	OTHER ISSUES
			time; attendance at and prep for Exec. Committee meetings should count towards credit; credits should carry over.	drive good planners away from AICP.
30.			X – No more than 14 hrs/year.	Courses should be offered online and segmented to accommodate busy schedules.
31.			X – Needs to be low cost and completed at the local level.	Too costly – may result in a loss of membership.
32.			X – Courses need to be readily available and easy accessible for all AICP members in terms of location and cost.	Most courses are currently held in Manhattan (hard for LI Planners); cost too high for municipal planners; profession is too small to offer convenient and frequent programs.
33.	X			
34.		X		Need to make AICP equivalent to licensure before implementing such a requirement; membership is not required to practice, mandatory certification maintenance shouldn't be required either.
35.			X – Too many hours – 24/ 2 years.	
36.		X		Too many hours; would likely let certification lapse if continuing ed is required.
37.		X		AICP has no value – not recognized as a professional credential to practice planning.
38.		X		Does not want this to happen, but if it does, no more than 12 hours/year.
39.	X			
40.		X		Does not want this to happen, but if it does, no more than 12 hours/year.
41.		X		Code of Ethics requires a commitment to best serve the interest of our clients/constituencies/municipalities; inherent in this is staying up-to-date – responsibility lies with the individual not APA.
42.			X – Too many hours – 12/year; too expensive.	Are local chapters prepared to offer a sufficient number of programs? A diversity of courses and materials need to be offered. Chapters should offer a free ethics course every two years.

NY METRO CHAPTER MEMBER	SUPPORT	DOES NOT SUPPORT	SUPPORT WITH MODIFICATIONS	OTHER ISSUES
43.		X		Too expensive; will let membership lapse if required.
44.		X		Too many hours; not practical for experienced planners – most courses are too basic; would likely let membership lapse if required.
45.		X		Goal of all this is not clear. Additional cost in addition to yearly dues.
46.		X		Have already reached a prominent place in profession, yet would still need to pay to take classes. Does not take into account experience. Does not take retirees into account.
47.			X – Should have exemption for planners practicing 20+ years.	Would take up limited and valuable time away from family and work.
48.		X		This proposal will take away members. AICP should lobby for exempt status based on years in AICP.
49.		X		CMP is biased against planners living outside major metro areas where travel to conferences and expenses makes it expensive and unwieldy to maintain. Additionally, as hearing handicapped individual, conferences are not sensitive to providing a learning environment that uses reading material.
50.			X – Reduce to 36 credits per 3 year period. Most planners don't have luxury of companies paying for conference/AICP travel. Should offer free/cheap web classes.	
51.		X		It does not address the underlying issues of: 1) time needed to obtain CM, 2) cost need to maintain CM, 3) fairness in venues needed to obtain CM, and 4) the fact that planners do not need an AICP to practice planning.

## ATTACHMENT B

### APA New York Metro Chapter – CMP Proposal Member Survey

On March 5, 2007 APA NY Metro Chapter sent out a survey to its members to gain input and feedback on the Certification Maintenance Proposal; one hundred and two (102) Chapter members responded. The Survey results are as follows:

Summary of CMP Survey	
<b>Do you have AICP certification?</b>	
% Certified	87%
% Not Certified	5%
% No Response	8%
<b>Should there be any mandatory educational requirement to maintain AICP certification?</b>	
% No Education Requirement	25%
% Yes Education Requirement	58%
<b>If yes, are you in favor of the current proposal?</b>	
% Do Not Support Current CMP Proposal	61%
% In Support	14%
<b>If no, what are your specific objections?</b>	
<b>Number of hours you would agree to:</b>	
% Less than 12 Units/2 yrs	36%
% 12 units/ 2 years	33%
% 18 units/2 yrs	25%
% 24 units/yrs	25%
% 24+ units	13%
<b>Ways to obtain credit:</b>	
Other Professional Organizations	63%
More Self-Guided Study	49%
Mentoring	32%
<b>Expense</b>	
% Expense not concern	15%
% Expense Concern	73%
<b>Time Off From Work</b>	
% Time Off Not Concern	16%
% Time Off Concern	78%
<b>If this proposal goes through for 40 hours every two years, would you:</b>	
Definitely Keep AICP	12%
Probably Keep AICP	21%
Not Sure	23%
Probably Drop AICP	23%
Definitely Drop AICP	5%