



Center for Mindful Stress Resilience

January 3, 2022

Christy Berger, Regulatory Analyst
California Board of Behavioral Studies
1625 N. Market Blvd., Suite S-200
Sacramento, CA 95834

Dear Ms. Berger,

Thank you for the opportunity to comment on the CE regulatory package. I am writing on behalf of Niroga Institute, a non-profit organization providing trauma-informed mindfulness and stress resilience courses to mental health providers in schools, juvenile halls, community service organizations, clinics, and more. We have provided up to 90 Mental Health CEUs in a single year.

We are concerned that if Self-Study is no longer allowed as a continuing education course option, we will not be able to serve the majority of our mental health partners, especially amid the ongoing pandemic, and despite the urgent need for mental health services increasing in California.

Our Self Study Program includes courses of up to 6-hours long in which participants, at their own pace, read course materials, watch videos that highlight the content, and take quizzes along the way ensure comprehension of evidence-based trauma-informed practices. We ensure client subject competency by an evaluation following completion of the course and this year, we will be increasing the interactivity of our courses through a new learning platform.

The Self Study option for our course allows for those we serve to learn at an affordable cost while continuing to serve their at-risk, often low-income, clients and communities. In an effort to accommodate multiple learning styles, the self-study option allows for clients to absorb the material at a pace that is best for them, allows them to select a time where they are more ready to learn, and gives them an option to review the content afterwards to aid with retention.

Though we also value in-person and live online courses, we respectfully request clarification that a continuing education "course" includes a self-study option prior to finalizing these regulations, to ensure that all options support inclusivity and equity. Thank you for your care and consideration.

Sincerely,

Rosalind Lwin
Associate Executive Director