

30 October 2006

Office of the Secretary of the Commonwealth  
Attention: Proposed Regulations  
Securities Division, Room 1701  
One Ashburton Place  
Boston, MA 02108

Dear Secretary Galvin:

The National Organization for Competency Assurance (NOCA) appreciates this opportunity to comment on the proposed additions to 950 *Code of Massachusetts Regulations* (CMR), 12.204(2)(i) and 12.205(9)(c)(15), regarding the use of credentials or professional designations that indicate special expertise or training in advising or servicing senior investors.

For the reasons that follow, NOCA supports the proposed regulations that would prohibit the use (by broker-dealer agents and investment adviser representatives) of credentials or professional designations purporting to indicate special expertise or training in advising or servicing senior investors, except such credentials or designations that have been accredited by a nationally recognized independent accrediting organization whose purpose is to develop standards and implement methods for assuring competency.

### **Background Information About Credentialing**

“Credential” is a broad term that encompasses professional certification (of individuals by a non-governmental organization), accreditation (of organizations, institutions, facilities, or programs, by a non-governmental organization), licensure (of individuals by a government agency), and registration (which has several meanings beyond the scope of our current comment). Essentially, a legitimate credential—that is, a credential which is legally defensible and psychometrically sound—is verification by an authoritative third party that the credential-holder has met predetermined, standardized, and uniformly applied criteria that measure appropriate job qualifications.

As noted in *The NOCA Guide to Understanding Credentialing Concepts*:

. . . when conducted according to legally defensible and psychometrically sound methods and standards, credentialing . . . assures that a highly qualified, objective, recognized third party (the credentialing body) has examined this person, program, product or service and found it to meet defined, published, psychometrically sound, and legally defensible standards.<sup>1</sup>

This third-party assurance that an occupationally relevant and credible standard has been met helps to ensure the health, welfare, and safety of the public—most directly, that of employers, consumers, government regulators,

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<sup>1</sup> Cynthia C. Durley, National Organization for Competency Assurance, *The NOCA Guide to Understanding Credentialing Concepts* 5 (William Kersten *et al.*, eds., 2005).

and business partners of the credential holder. Thus, reputable credentialing organizations serve the public interest by decreasing uncertainty in the labor market and in the marketplace.

Historically, as a new occupation comes into being and evolves, its body of knowledge develops and becomes accepted by the individuals performing that job, by employers, and by customers. The emergence of a defined body of knowledge and a specific vocabulary are important steps in the development and definition of an occupation. As a profession's body of knowledge becomes commonly accepted, the profession typically becomes regulated, either by the profession itself or by a government agency. In order to regulate appropriately—that is, to regulate in a legally defensible way—skill sets must be defined, and knowledge and skills competencies must be assessed and validated. Credentialing (certification and licensing) programs perform those functions, helping an occupation mature and become stable. This longstanding process, culminating with the development and acceptance of professional credentials, is especially imperative in occupations in which public protection is of primary importance.

Established in 1977, NOCA<sup>2</sup> is the national membership organization for the credentialing industry, representing more than 600 credentialing organizations. Through an annual conference, regional and audio seminars, publications, and government affairs activities, NOCA serves the credentialing industry as a clearinghouse for information on the latest trends and issues of concern to practitioners and organizations focused on certification, licensure, and human resource development.

The National Commission for Certifying Agencies (NCCA) is the accreditation arm of NOCA. Credentialing programs may apply and be accredited by the NCCA if they demonstrate compliance with each of the *NCCA Standards for the Accreditation of Certification Programs*, which exceed the requirements set forth by the American Psychological Association, et al.<sup>3</sup> and by the United States Equal Employment Opportunity Commission.

Driven in part by the proven reliability of high-profile, national credentialing programs (such as the Certified Financial Planner<sup>TM</sup>), and in part by the “nationwide trend whereby state regulatory agencies are getting out of the testing business, and instead recognizing professional certifications as meeting state regulatory requirements,”<sup>4</sup> the credentialing industry has grown steadily over the past thirty years. In just six years, from 1999 to 2005, the estimated number of certified individuals increased from approximately 9 million to over 15 million.<sup>5</sup> In the same six-year period, NOCA membership increased almost 60% and the number of NCCA-accredited programs grew 150%.<sup>6</sup>

### **The Proposed Regulations Reflect Sound Public Policy**

The National Organization for Competency Assurance (NOCA) supports the proposed additions to the *Code of Massachusetts Regulations* (CMR) and commends Secretary Galvin and the Massachusetts Securities Division for proactively addressing this threat to senior investors in the Commonwealth. Prohibiting the use of unaccredited and misleading credentials by broker-dealer agents and investment adviser representatives is an effective means of preventing financial predation on some of the most vulnerable members of society. In addition, combining a governmental mandate with private sector expertise is a logical way of achieving this objective at minimal cost to the taxpayers of Massachusetts.

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<sup>2</sup> On the internet at [www.noca.org](http://www.noca.org).

<sup>3</sup> American Educational Research Association (AERA), American Psychological Association (APA), and National Council on Measurement in Education (NCME), *The Standards for Educational and Psychological Testing*, 1999.

<sup>4</sup> *Supra* note 1 at 10.

<sup>5</sup> Wade Delk, *Trends in Certification*, CM News, Aug. 2006, at 19.

<sup>6</sup> *Id.*

As with all well-conceived government regulations, 12.204(2)(i) and 12.205(9)(c)(15) set forth specific requirements that would protect the public, but would not interfere unduly with existing market mechanisms. Allowing the use of credentials and professional designations that meet objective, third-party tests of legal defensibility and psychometric soundness not only would eliminate meaningless or deceptive credentials from the marketplace, but also would encourage healthy competition among legitimate providers of financial services and products. The ultimate beneficiaries of this market-driven but governmentally-safeguarded system would be the senior investors of Massachusetts. They would continue to be able to evaluate and select financial and investment professionals that suit their personal preferences, but would be assured that the information they receive about the education and current competence of such professionals would be reliable and useful.

The regulatory framework embodied in the proposed regulations would also reduce the enforcement costs for the Commonwealth of Massachusetts. The careful, disinterested scrutiny of independent entities that accredit professional credentialing programs would dramatically reduce the frequency of regulatory enforcement actions initiated by the Massachusetts Securities Division, such as the action against Brokers Choice of America and Senior Benefit Centers Network mentioned in the statement of Secretary of the Commonwealth William Francis Galvin announcing the proposed regulations.

### **Credentials Accredited by NCCA or ANSI/ISO/IEC 17024 Should Be Exempt from the Prohibitions of the Proposed Regulation**

Both proposed regulations include a reference to “a nationally recognized independent accrediting organization whose purpose is to develop standards and implement methods for assuring competency.” It is NOCA’s position that, as stated in Secretary Galvin’s announcement, credentials or designations that have been accredited by “a nationally recognized independent accrediting organization such as the National Commission for Certifying Agencies (“NCCA”) of the National Organization for Competency Assurance or the American National Standards Institute/International Standards Organization/International Electrotechnical Commission 17024 (“ANSI/ISO/IEC 17024”) accreditation program” should be deemed exempt from the prohibitions of the proposed regulations.

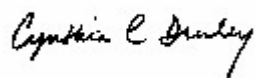
The *NCCA Standards for the Accreditation of Certification Programs* are attached.

### **Conclusion**

For the reasons stated above, the National Organization for Competency Assurance supports the proposed addition of 12.204(2)(i) and 12.205(9)(c)(15) to 950 *Code of Massachusetts Regulations*.

NOCA is grateful for your consideration of our input. If you have any questions about this issue or anything else related to credentialing, please contact our Executive Director, Jim Kendzel, at 202-367-1165 or [jkendzel@smithbucklin.com](mailto:jkendzel@smithbucklin.com). Please let me know if we may be of further assistance. Thank you.

Yours truly,



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President  
National Organization for Competency Assurance

Attachments: *The NOCA Guide to Understanding Credentialing Concepts*  
*NCCA Standards for the Accreditation of Certification Programs*

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# **The NOCA Guide to Understanding Credentialing Concepts**

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## EXECUTIVE SUMMARY

Nearly every profession uses credentialing to establish criteria for fairness, quality, competence, and/or safety for professional services, products, or educational endeavors. In some cases, professions voluntarily develop quality standards of practice; a profession may also be regulated by the State or Federal government. Despite the widespread use of professional designations, credentialing terms are often misused and general concepts often misunderstood. The National Organization for Competency Assurance (NOCA), the national membership association for professional certification organizations, developed *The NOCA Guide to Understanding Credentialing Concepts* to assist its stakeholders, including legislators, educators, employers, credentialing agencies, professionals and the public, in understanding and correctly using credentialing terms and concepts.

This paper addresses the following:

- Purposes served by credentialing
- Definitions and descriptions of credentialing terms
- Processes used in conducting or choosing a psychometrically sound and legally defensible credentialing examination program
- Differences between didactic (end-of-course) examinations and professional credentialing examinations

### **General NOCA Information ([www.noca.org](http://www.noca.org))**

Established in 1977, NOCA serves as a clearinghouse for information on the latest trends and issues of concern to practitioners and organizations focused on certification, licensure, and human resources development. NOCA's accrediting body, the National Commission for Certifying Agencies (NCCA), is the international leader in setting quality standards for credentialing organizations and grants accreditation to those organizations that meet these Standards.

NOCA's mission is to promote excellence in competency assessment for practitioners in all occupations and professions by:

- Providing expertise and guidance
- Developing and implementing standards for accreditation of certification programs through NCCA (NOCA's accrediting body)
- Providing educational and networking resources
- Serving as an advocate on certification issues

NOCA's vision is to:

- Establish NOCA as the authority in certification and NCCA as the authority in accreditation of certification programs.
- Educate the general consumer so they understand the value of voluntary certification and recognize the NCCA seal as representative of quality certification programs.
- Enhance quality member benefits and resources so all certification organizations will join NOCA and aspire to NCCA accreditation of their certification programs.
- Lead the global transformation to excellence in competency assessment.

## WHAT PURPOSE DOES CREDENTIALING SERVE?

Credentialing programs serve many purposes including, but not limited to:

- Protecting the public
- Establishing standards for professional knowledge, skills, and practice
- Assuring consumers that professionals have met standards of practice
- Meeting the requirements of governmental regulators
- Helping members of an association or organization work with governmental agencies to regulate the profession
- Developing a customized credential to meet unique needs in the marketplace, because: such a credential does not currently exist; a credential exists, but the organization wishes to differentiate itself from its competition; or because new technologies or procedures have developed into a new scope of practice or body of knowledge
- Meeting the needs of employers, practitioners, and the public to identify individuals with certain knowledge and skills
- Furthering a company's overall business goals – that is, to ensure that consumers have access to skilled professionals knowledgeable about the company's products and services
- Advancing the profession
- Reflecting an individual's attainment of knowledge of a specifically defined course of study or of technical skills recognized by a manufacturer or service provider
- Providing the individual certificant with a sense of pride and professional accomplishment
- Demonstrating an individual's commitment to a profession (and to life-long learning, if the credential is a professional certification, requiring recertification by continuing education, examination, self-assessment, etc.)

## DEFINITIONS AND DESCRIPTIONS OF TYPES OF CREDENTIALS

Credit for the sources of these definitions is shared among the resources listed in the bibliography.

**Credentialing** is the umbrella term that includes the concepts of accreditation, licensure, registration, and professional certification.

**Credentialing** can establish criteria for fairness, quality, competence, and/or safety for professional services provided by authorized individuals, for products, or for educational endeavors. Credentialing is the process by which an entity, authorized and qualified to do so, grants formal recognition to, or records the recognition status of individuals, organizations, institutions, programs, processes, services or products that meet predetermined and standardized criteria.

The **credentialing process** is essentially a method for maintaining *quality* standards of knowledge and performance, and in some cases, for stimulating *continued self-improvement*. Credentialing confers occupational *identity*.

**Accreditation** is the voluntary process by which a nongovernmental agency grants a time-limited recognition to an institution, organization, business, or other entity after verifying that it has met predetermined and standardized criteria.

**Professional certification** is the voluntary process by which a non-governmental entity grants a time-limited recognition and use of a credential to an individual after verifying that he or she has met predetermined and standardized criteria. It is the vehicle that a profession or occupation uses to differentiate among its members, using standards, sometimes developed through a consensus-driven process, based on existing legal and psychometric requirements. The holder of a professional certification is called a **certificant**.

**Licensure** is the mandatory process by which a governmental agency grants time-limited permission to an individual to engage in a given occupation after verifying that he/she has met predetermined and standardized criteria, and offers title protection for those who meet the criteria.

**Registration** has at least three meanings: one is the governmental process by which a governmental agency grants a time-limited status on a registry, determined by specified knowledge-based requirements (e.g., experience, education, examinations), thereby authorizing those individual's to practice, similar to licensure. Its purpose is to maintain a continuous record of past and current occupational status of that individual, and to provide title protection.

A second meaning of **registration** is simply a listing of practitioners maintained by a governmental entity, without educational, experiential, or competency-based requirements; for example, maintaining a list of practitioners on a state 'registry.'

A third use of the term **registration** is a professional designation defined by a governmental entity in professional regulations or rules. However, the governmental regulatory body does not itself maintain a listing or registry of those who purport to meet registration requirements. Verification and authentication of such individuals are left to the employer of the individual claiming to be registered.

Therefore, when conducted according to legally defensible and psychometrically sound methods and standards, credentialing, in the form of accreditation, licensure, the first form of registration, or a professional certification, assures that a highly qualified, objective, recognized third party (the credentialing body) has examined this person, program, product or service and found it to meet defined, published, psychometrically sound, and legally defensible standards.



While the following may be considered by some to be types of credentialing processes, these certificate programs are not held to the objective standards required of the other types of credentialing programs.

**A certificate program** is a training program on a topic for which participants receive a certificate after attendance and/or completion of the coursework. Some programs also require successful demonstration of attainment of the course objectives. One who completes a professional certificate program is known as a **certificate holder**. A credential is usually NOT granted at the completion of a certificate program.

There are three types of certificate programs: **knowledge-based certificate**, **curriculum-based certificate**, and **certificate of attendance or participation**.

A **knowledge-based certificate** recognizes a relatively narrow scope of specialized knowledge used in performing duties or tasks required by a certain profession or occupation. This certificate is issued after the individual passes an assessment instrument.

A **curriculum-based certificate** is issued after an individual completes a course or series of courses and passes an assessment instrument. The content of the assessment is limited to the course content and therefore may not be completely representative of professional practice (and therefore it is not as defensible to use this or the knowledge-based type of certificate for regulatory purposes as compared to a professional certification).

A **certificate of attendance or participation** is issued after an individual attends or participates in a particular meeting or course. Usually, there is no knowledge assessed prior to issuing this type of certificate. A certificate of attendance or participation is **not a credential**, because the recipients are not required to demonstrate competence according to professional or trade standards.

(These aforementioned certificate programs should not be confused with high level, post-master's degree programs offered within some nursing specialties.)

## PROCESSES USED IN CONDUCTING OR CHOOSING A PSYCHOMETRICALLY SOUND, LEGALLY DEFENSIBLE CREDENTIALING PROGRAM

While professional regulation may occur on the Federal level, it is most often conducted by State professional regulatory boards whose mission it is to protect the public by ensuring that professionals meet Federal or State-specific credentialing requirements such as completing specific educational and/or experiential requirements and passing an examination to demonstrate competence to practice the profession. Only those who meet the regulatory requirements and remain in compliance with the State professional practice act may legally practice the profession.

Some professional regulatory boards use national examinations prepared specifically for regulatory purposes. Others recognize examinations prepared by voluntary credentialing programs. In this case, the regulatory body must ensure that all required or recognized credentialing programs and their examinations are developed and conducted according to legally defensible and generally accepted psychometric principles and standards. These standards include the following:

- *Standards for Educational and Psychological Testing* (1999, American Psychological Association, American Educational Research Association, National Council on Measurement in Education)

- *Principles of Fairness: An Examining Guide for Credentialing Boards* (Revised 2002, Council on Licensure, Enforcement, and Regulation, National Organization for Competency Assurance).
- *Uniform Guidelines on Employee Selection Procedures* (1978, Equal Employment Opportunity Commission, Civil Service Commission, US Department of Labor, US Department of Justice)
- *NCCA Standards for the Accreditation of Certification Programs* (2003, National Organization for Competency Assurance's National Commission for Certifying Agencies)

Engaging the services of a **psychometrician** is necessary to interpret and implement these standards as part of a psychometrically sound and legally defensible credentialing program.

According to Larry Early in *Starting a Certification Program, 2<sup>nd</sup> Edition*, **psychometrics** is the science and technology of mental measurement, including psychology, behavioral science, education, statistics, and information technology.

A professional **psychometrician** is needed to:

- Design and analyze results of a job analysis or role delineation to define knowledge and/or skill associated with performance domains and tasks associated with the identified profession.
- Establish examination specifications based on a job analysis or role delineation.
- Select appropriate examination item format to meet measurement goals.
- Facilitate examination development based on examination specifications and item writing principles.
- Facilitate passing standard ('cut score') studies, such that the cut score is consistent with the purpose of the credential and the established standard of competence for the profession.
- Advise on examination administration policies and procedures that are appropriate, standardized, and secure.
- Analyze examination results using appropriate statistical methods.
- Establish scoring and reporting procedures, and ensure the security and confidentiality of such scores and reports.
- Ensure that the reported scores are sufficiently reliable for the intended purpose(s) of the examination.
- Ensure that different forms of an examination assess equivalent content and that candidates are not disadvantaged for taking a form of an examination that varies in difficulty from another form.
- Conduct ongoing research in the areas of reliability and validity.

## DIFFERENCES BETWEEN END OF COURSE TESTS AND PROFESSIONAL CREDENTIALING EXAMINATIONS

According to the Education Policy and Leadership Center, high stakes testing is the use of test scores to make decisions that have important consequences for individuals, such as tests some states require before individuals can graduate from high school; college and graduate school admissions tests; and credentialing (licensure, registration and certification) examinations.

Therefore, any examinations used to meet state licensure or registration requirements are considered “high stakes” because passing such examinations allows individuals to perform professional duties as proscribed by State or Federal regulatory bodies. End-of-course examinations should not be allowed to substitute for professional credentialing examinations in these high stakes testing situations, because these examinations are not designed for, and are therefore not valid for, these purposes. Educational courses and examinations offered as part of a course or degree program are not designed to stand alone; few if any such tests are developed and scored according to psychometrically sound principles and standards, and therefore, are not likely to be legally defensible in making employment and promotion decisions.

Unfortunately, sometimes confusion exists regarding the concepts of end-of-course (didactic) examinations or educational knowledge-based certificate programs as compared to professional certification or other professional credentialing examinations. In addition to the differentiating characteristics described earlier in this paper, there are five major criteria that distinguish a **professional credentialing (certification, licensure or registration) examination** from an **end-of-course examination**:

1. A professional role delineation or job analysis is conducted and periodically validated.
2. A demonstration of how the examination is linked to a defined body of knowledge, based on the professional role delineation or job analysis, is provided.
3. A demonstration of reliability and validity of the examination, based on psychometrically accepted statistical methods, is provided.
4. A minimum passing score is developed using psychometrically accepted statistical methods.

A demonstration that alternate forms of the examination are parallel in construction and content coverage, and equated for difficulty using psychometrically sound techniques, is provided.

In addition, when a professional credentialing examination is part of a **professional certification**, credential maintenance or recertification is (or should be) required. The credential maintenance process or recertification requirements involve the enhancement and/or the evaluation of continued competence, with an emphasis on lifelong professional learning and development.

A knowledge-based or curriculum-based certificate program, on the other hand, often has a short ‘shelf life.’ To earn the certificate, individuals are exposed to and learn information and/or skills, and then take a test of some type. A professional disadvantage to a certificate program is that the knowledge gleaned to earn the certificate may be too generic to be useful in one’s career, or may be too narrow in its focus, or may quickly become outdated. These types of certificate programs may become insufficient in and of themselves for demonstrating continuing competence, or for moving people forward in their careers. In addition, certificates obtained at the conclusion of such courses may not be developed and are not bound by generally accepted psychometric principles, as noted above.

While curriculum-based end-of-course examinations are usually based on curriculum guidelines and learning objectives, valid, accredited **professional credentialing examinations**, including licensure,

registration, and certification examinations should be based on a **professional role delineation or job analysis**. According to the National Commission for Certifying Agencies' *Standards for the Accreditation of Certification Programs*, a **job analysis** or **role delineation** study is defined as:

*Any of several methods used singly or in combination to identify the performance domains and associated tasks, knowledge, and/or skills relating to the purpose of the credential and providing the basis for validation.*

A **role** is likewise defined as:

*A more specific or narrower set of knowledge and skills than may be encompassed by the term 'profession' or 'occupation,' and may also be the focus of certification for a particular product or service.*

The results of the job analysis or role delineation are used to develop the blueprint or outline for the credentialing examination.

The reason that credentialing examinations are based on a job analysis and the application of knowledge in the work setting and not based solely or primarily on theoretical knowledge is grounded in concepts surrounding the legal defensibility of these examinations to regulate entry into a profession or promotion within a profession. A legally defensible credentialing examination tests the application of knowledge required to perform a specific task, not necessarily the underlying theory that serves as the foundation for this application of knowledge. This does not mean that the theory is not important, just that it is not often tested. There have been legal cases that have set precedent to support this decision to test the application of knowledge rather than theory. Individuals have argued that if they can perform the task, they should be able to become employed, whether or not they have the theoretical foundation.

Certainly one can argue that the theoretical foundation helps a professional or other certificant to understand the duties performed on the job. While this may very well be true, a credentialing examination cannot discriminate against those who do not know the theory, as long as the examination candidates can demonstrate that they have the knowledge required to perform the tasks reflected in the job analysis or role delineation.

Therefore, in summary, if state or federal regulatory bodies allow end-of-course examinations to substitute for professional credentialing examinations, they may be vulnerable to legal challenges. Questions of particular importance in the determination of whether or not a high stakes examination may be successfully defended against a legal challenge include but are not limited to these:

- How was it objectively determined that the examination measures content representative of the profession or the duties to be allowed to be performed by the professional?
- How was the passing point determined so that candidates are not penalized for taking a more difficult form of the examination?
- How can one determine if various forms of the examination are equivalent or equated in both content coverage and difficulty?

## CONCLUSION

Organizations sponsoring professional credentialing programs and State and Federal regulatory bodies share a common mission: Public protection. Optimally, if a professional regulatory body recognizes or requires examinations developed and administered by an independent credentialing organization, the organization's professional certification programs would be accredited by the National Commission for Certifying Agencies (NCCA), the accrediting body of the National Organization for Competency Assurance (NOCA). All professional certification programs accredited by NCCA have demonstrated that they meet generally accepted psychometric principles and standards, leading to legal defensibility and public protection.

Please note that whether or not an *educational institution* sponsoring a course with an end-of-course examination is accredited is immaterial in this discussion, because accreditation of an educational institution *does not* address whether or not its end-of-course examinations are developed based on generally accepted psychometric standards, and are therefore valid for use as 'high stakes' examinations. In addition, accreditation of an educational institution does not, in and of itself, assess whether or not the four standards mentioned previously in this paper as crucial to the development of psychometrically sound and legally defensible examination programs have been applied to the development of end-of-course examinations.

There is a nationwide trend whereby state regulatory agencies are getting out of the testing business, and instead recognizing professional certifications as meeting state regulatory requirements. **Public protection is the core business and primary responsibility of both State and Federal regulatory agencies.** As such, the examinations required of professionals regulated by these agencies must be legally defensible and meet generally accepted psychometric standards. The reader should note, however, that there are few if any legal restrictions governing certification bodies. Virtually any organization can claim to be one.

Therefore, when choosing or recommending a professional credentialing program, stakeholders should investigate key components, and determine whether or not the credentialing program is accredited, and if so, by which accrediting body. If the credentialing program is accredited by NCCA, this means that the credentialing organization has independently demonstrated that the examinations within its NCCA-accredited certification programs are developed, administered, scored and reported according to generally accepted psychometric standards and its governance and administration also meet NCCA Standards. Insisting on NCCA accreditation of a certification program is a safeguard for regulatory bodies looking to use professional certification programs or examinations when implementing professional regulatory requirements.

For more information about NOCA membership and NCCA accreditation, and the topics discussed in this paper, contact:

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# National Commission for Certifying Agencies

## Standards for the Accreditation of Certification Programs



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# Table of Contents

Preamble.....	1
Introduction.....	1
Structure and Development of the Standards.....	2
Standards.....	4
Purpose, Governance and Resources.....	4
Responsibilities to Stakeholders.....	7
Assessment Instruments .....	10
Recertification.....	18
Maintaining Accreditation .....	19
Glossary .....	20
Project Donors .....	25
2002 NCCA Commission .....	26
2002 NOCA Board of Directors .....	27
Steering Committee.....	28
Task Force on Purpose, Governance and Resources .....	28
Task Force on Responsibilities to Stakeholders .....	29
Task Force on Assessment Instruments.....	29
Task Force on Recertification .....	29



## Preamble

### INTRODUCTION

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The National Commission for Certifying Agencies (NCCA) accredits certification organizations complying with its Standards. The mission of NCCA is to help ensure the health, welfare, and safety of the public through the accreditation of certification programs/organizations that assess professional competence. The NCCA uses a peer review process to establish accreditation standards, to evaluate compliance with these standards, to recognize organizations/programs which demonstrate compliance, and to serve as a resource on quality certification. The purpose of NCCA accreditation is to provide the public and other stakeholders the means by which to identify certification programs that serve their competency assurance needs. NCCA Standards address the structure and governance of the certifying agency, the characteristics of the certification program, the information required to be available to applicants, certificants, and the public, and the recertification initiatives of the certifying agency. NCCA is a separately governed accreditation arm of the National Organization for Competency Assurance (NOCA), a membership association of certification organizations providing technical and educational information concerning certification practices.

Since the Standards were first issued in the late 1970s, NCCA has observed fundamental changes in the nature, scope, and importance of certification. First, the certification community has expanded dramatically to include a broader variety of occupational and professional credentials offered by non-profit organizations, for-profit entities, governmental agencies, and industries. Second, it is increasingly common for a certification organization to offer multiple certification programs. Third, the certification community has expanded internationally. Fourth, the certification and testing communities have introduced the computer as a means of both developing items and new assessment formats, as well as administering assessments. This change has also led to the implementation of modern testing methodologies to capitalize on the power of the computer to score and scale the assessment instruments. Fifth, an increasing number of certification programs are recognized by state and provincial regulatory authorities, a practice that expands the traditional definition of certification.

In keeping with its service to the public and to various other stakeholders of professional certification, and in order to address fundamental changes in certification, NCCA undertook the review and revision of its accreditation standards. In 1997, NCCA established two Task Forces to address the feasibility of revising the accreditation Standards to address the changes described above and to ensure the currency of the Standards for the foreseeable future. The Task Forces were eventually combined at the end of 1997 to form a Steering Committee.

In August 1998, NCCA obtained approval from the NOCA Board of Directors to conduct fundraising activities in support of the continued work of the Steering Committee. As an outcome of this effort, NCCA hired an independent project manager.

During 1999 and early 2000 the Steering Committee conducted activities through the formation of four Task Forces, each focusing on a different set of accreditation standards: (1) Purpose, Governance, and Resources (2) Responsibilities to Stakeholders (3) Assessment Mechanisms, and (4) Recertification. The Task Forces represented a cross section of currently accredited groups, testing services, and other professionals with expertise in certification.

Members of the Steering Committee and the Task Forces reported to NCCA in November, 1999, and to the NOCA Board and Membership in December, 1999. A complete report of the Standards Revision Project was prepared and submitted to NCCA by the Steering Committee in March, 2000. After NCCA review and revision of the Steering Committee's report a draft of these documents was made available for public comment. Following numerous revisions and review periods throughout 2001 the draft Standards were presented to the organizations accredited by the NCCA for ratification in January, 2002. The Standards were approved in February, 2002.

## STRUCTURE AND DEVELOPMENT OF THE STANDARDS

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The Standards focus on certification programs and are organized into five sections: (1) Purpose, Governance, and Resources, containing five Standards (2) Responsibilities to Stakeholders, containing four Standards (3) Assessment Instruments, containing nine Standards (4) Recertification, containing two Standards, and (5) Maintaining Accreditation, containing one Standard.

To earn or maintain accreditation by NCCA, the certification program must meet *all* Standards and provide evidence of compliance through the submission of required documentation.

The statements describing the Standards are numbered consecutively. Accompanying each Standard are ***Essential Elements***, which are directly related to the Standard and specify what a certification program must do to fulfill requirements of the Standard.

A second subsection under each Standard is called ***Commentary***. The Commentary section clarifies terms, provides examples of practice that help explain a Standard, or offers suggestions regarding evidence that must be documented to demonstrate compliance. NCCA reserves the right to revise the Essential Elements and the Commentary sections in response to changes in certification practice.

The development of the Standards was guided by the following assumptions:

1. A number of previous NCCA Standards, such as the requirement that the certifying agency be non-governmental, nonprofit, and national in scope, are restrictive. Further, by opening the accreditation process to include certification programs in for-profit organizations, NCCA more effectively achieves its public service mission.
2. The appropriate unit of accreditation is the certification program rather than the certifying organization. In fact, NCCA accreditation previously required that all certification programs offered by an agency meet all standards in order for the agency to achieve accreditation.
3. NCCA accreditation should be awarded for a period of five years for the initial program certification. If organizations or agencies apply for NCCA accreditation of additional programs following accreditation of the original program(s), any new programs will be accredited until the date the organization's initial accreditation expires. All of an organization's accredited programs will be eligible for renewal on the same the five-year renewal cycle.
4. Autonomy in the management and administration of certification protects certification programs from undue influence. Autonomy is required in order for certification programs to serve stakeholder interests, primarily those of consumers of professional services. However, since certification programs take different forms for different professions and occupations, a variety of structures may be effectively employed to prevent undue influence from competing interests.

5. The term stakeholder has been used to refer to candidates and the public, as well as to members of a profession, occupation, or regulatory body. The term denotes the primary interest of the public and other consumers of the certification program. The term also encompasses certificants and the entities offering certification, as well as educators, and employers. It is appropriate to acknowledge the legitimate influence of all stakeholder bodies.
6. The NCCA Standards pertaining to assessment instruments should be consistent with the Standards for Educational and Psychological Testing (American Educational Research Association, American Psychological Association, and National Council on Measurement in Education, 1999), as well as other standards and guidelines related to certification accreditation developed by specific professions, occupations, governmental agencies, and international organizations, or certification activity criteria more generally, such as (but not limited to) Principles of Fairness: An Examining Guide for Credentialing Boards (Council on Licensure Enforcement and Regulation and the National Organization for Competency Assurance, 1993) and the Uniform Guidelines on Employee Selection Procedures (Equal Employment Opportunity Commission, Civil Service Commission, U.S. Department of Labor, and U.S. Department of Justice, 1978).
7. Recertification is valuable for all certification programs. Demonstrating continuing competence through a variety of recertification mechanisms is in the best interests of both the public and the discipline certified.

## Standards

### PURPOSE, GOVERNANCE, and RESOURCES

#### Standard 1

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**The purpose of the certification program is to conduct certification activities in a manner that upholds standards for competent practice in a profession, occupation, role, or skill.**

***Essential Element:***

- A. It is the responsibility of the certification program applying for NCCA accreditation to identify the population being certified and to provide justification for the appropriateness of its certification activities. Typically, a certification program issues a credential or title to those certified. If the applying program does not, an explanation should be provided explaining why the issuance of a credential or title is not appropriate to the profession, occupation, role, or skill.

***Commentary:***

- A. Suggested evidence to document that the Standard has been met may include a mission statement, bylaws, articles of incorporation, a policy and procedures document, a governing committee charter, or candidate brochures.

#### Standard 2

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**The certification program must be structured and governed in ways that are appropriate for the profession, occupation, role, or skill, and that ensure autonomy in decision making over essential certification activities.**

***Essential Elements:***

- A. The certifying program must show that the governance structure, policies, and procedures that have been established protect against undue influence that could compromise the integrity of the certification process.
- B. The governance structure, policies, and procedures must provide for autonomy in decision making regarding important aspects of the certification program such as eligibility standards; the development, administration, and scoring of the assessment instruments; selection of personnel; and operational processes.
- C. The development, administration, and scoring of assessment instruments must promote the purpose of the certification program.
- D. To avoid conflicts of interest between certification and education functions, the certification agency must not also be responsible for accreditation of educational or training programs or courses of study leading to the certification.

**Commentary:**

- A. The appropriate structure and governance of a certification program will reflect the interests of the general public in the credential. In traditional forms of professional or occupational certification, public interest requires direct protection of essential certification decisions from undue influence. Such protection is especially important when a certification program is sponsored by a professional membership association or proprietary entity. In these cases it is appropriate that the certification program's structure and governance protect the integrity of essential certification decisions.

When the certification program involves a proprietary product or service, the issue of undue influence is different. In these cases it is assumed that the proprietor has a clear and reasonable self-interest in preventing external or competing influences from diminishing the quality of the certification. It is recognized that the public is often not a direct consumer of the activities of the certified population. The public interest will be adequately protected when the needs of the proprietor, employers, or purchasers who rely on the credential provide significant direction over certification policy and decision making.

- B. Pressure to adjust certification standards either to limit the number of certificants or to reduce or elevate the established standard by changing requirements could interfere with the maintenance of standards established for a given certification.
- C. Certification programs may satisfy the requirement for autonomy of the governing body or governing committee in a number of ways. Incorporation of the certifying agency as an independent unit usually ensures autonomy. The bylaws of a parent organization may be constructed so that certification program governance and decision-making are defined as the responsibility of a specific unit of the organization with complete authority over all essential certification decisions. A governing committee may be given such authority in the policies and procedures and organizational chart of a corporation.
- D. In addition to not *accrediting* programs leading to the initial certification, the certification organization must not require that candidates complete that organization's program for certification eligibility. If a certification organization *provides* an educational program (including but not limited to primary education, exam preparation courses, study guides), the organization must not state or imply that: 1) this program is the only available route to certification; or 2) that purchase or completion of this program is required for initial certification.
- E. Suggested evidence to document that the Standard has been met may include a mission statement, bylaws, articles of incorporation, business plans, a policy and procedures document, a governing committee charter, or organizational charts.

**Standard 3**


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**The certification board or governing committee of the certification program must include individuals from the certified population, as well as voting representation from at least one consumer or public member. For entities offering more than one certification program, a system must be in place through which all certified populations are represented, with voting rights, on the certification board or governing committee.**

**Essential Elements:**

- A. A system or structure must be established for ensuring appropriate stakeholder involvement by designating certain representative positions on the governing body. To ensure a balance of program input, the governing body may implement a rotating system of representation over a set period of time.

- B. The certification program must establish bylaws and/or policies and procedures for the selection of individuals who serve on the board or governing committee. This information must show that the selection of these individuals prevents inappropriate influence from a parent or outside body.

***Commentary:***

- A. It is important that stakeholders (e.g., the public and other consumers, employers, regulators, and certificants) are represented on the body(ies) that sets policies regarding the certification program, including activities related to eligibility and the development, administration, and scoring of the assessment instrument.
- B. Suggested evidence to document that the Standard has been met may include a mission statement, bylaws, articles of incorporation, business plans, a policy and procedures document, a governing committee charter, or organizational charts.
- C. The public member is considered by NCCA to be a person who represents the direct and indirect users of certificants' skills/services. The public member may be a professional, but should not have similar credentials to the certificants. The NCCA recommends, but does not require, that the public member has at some time been a consumer of the certificants skills or services or is someone who has a background in public advocacy.

The public member is/has not:

- A current or previous member of the profession encompassed by the certification programs of the certification organization.
- An employer or an employee of individuals in the profession encompassed by the certification programs of the certification organization.
- An employee of an individual certified by the certification organization or of an employer of individuals in the profession encompassed by the certification programs of the certification organization.
- An employee of any certification organization.
- Currently deriving more than 5% of their total income from the profession encompassed by the certification programs of the certification organization.
- Derived in any of the five years preceding my appointment as a public member on the governing body more than 5% of their total income from the profession encompassed by the certification programs of the certification organization.
- Worked for or provided contract services to the certification organization at any time during the five years preceding my appointment as a public member on the governing body.

## Standard 4

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**The certification program must have sufficient financial resources to conduct effective and thorough certification and recertification activities.**

***Essential Element:***

- A. Financial reports of the certification program must demonstrate adequate resources available to support ongoing certification and recertification processes.

***Commentary:***

- A. The certification program should be able to document that monies used for the certification program are readily available.
- B. Suggested evidence to document that the Standard has been met includes financial statements for the certification program.

**Standard 5**

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**The certification program must have sufficient staff, consultants, and other human resources to conduct effective certification and recertification activities.**

***Essential Elements:***

- A. Key staff and non-staff consultants and professionals must possess adequate knowledge and skill to conduct certification program activities.
- B. The certification program must have adequate resources to conduct the activities (e.g., processing of applications, administering the assessment instrument, storage of records) of the certification program.

***Commentary:***

- A. Documentation of resource availability and activity occurrence does not mean that every certification program must have its own office or building; in some cases, all activities could be adequately handled with services from a testing company, consultants, or management service.
- B. Suggested evidence to document that the Standard has been met may include resumes or curriculum vitae of key staff, non-staff consultants, and professionals, and associated organizational charts describing the inter-relationships among the individuals providing services to the certification program.

**RESPONSIBILITIES to STAKEHOLDERS****Standard 6**

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**A certification program must establish, publish, apply, and periodically review key certification policies and procedures concerning existing and prospective certificants such as those for determining eligibility criteria; applying for certification; administering assessment instruments; establishing performance domains, appeals, confidentiality, certification statistics, and discipline; and complying with applicable laws.**

***Essential Elements:***

- A. Published documents that clearly define the certification responsibilities of the organization must include the following:
  - The purpose of the certification program
  - Eligibility criteria and application policies and procedures
  - Materials outlining all examination processes and procedures
  - A detailed listing and/or outline of the performance domains, tasks, and associated knowledge and/or skills

- A summary of certification activities (number of candidates examined, pass/fail statistics, and number of individuals currently certified) for each program
  - Discipline, nondiscrimination, and confidentiality policies and procedures
  - Appeals policies and procedures
- B. Confidentiality policies must (a) ensure that candidate application status and examination results are held confidential, and (b) delineate the circumstances under which this information may be disclosed or made public.
- C. Policies and procedures must be published and must include guidelines by which candidates may question eligibility determination, assessment instrument results, and certification status.
- D. Disciplinary policies must include procedures to address complaints that may concern conduct that is harmful to the public or inappropriate to the discipline (e.g., incompetence, unethical behavior, or physical/mental impairment affecting performance). These policies must ensure appropriate treatment of sensitive information and fair decision making.

***Commentary:***

- A. Publications concerning eligibility criteria, applications, assessment instruments, appeals, discipline, confidentiality, etc., are required to inform candidates and other stakeholders about program policies.
- B. Applicable laws and regulations include nondiscrimination, disabilities, and other issues which may affect fairness to candidates or protection for consumers.
- C. Procedures for requesting accommodations for disabled candidates should be stated clearly and published in an appropriate agency document. The process should include mechanisms that will ensure that proper evidence is submitted to the agency to assist the agency in making a determination regarding the requested accommodation.
- D. Any accommodation provided should be reasonable and not compromise the validity and reliability of the assessment instruments.
- E. Suggested evidence to document that the Standard has been met may include a policy and procedures manual, a candidate handbook, and any written documents or forms regarding procedures for obtaining approval for an accommodation.

## Standard 7

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**The certification program must publish a description of the assessment instruments used to make certification decisions as well as the research methods used to ensure that the assessment instruments are valid.**

***Essential Element:***

- A. Procedures related to assessment instruments must address development and validation, eligibility requirements, and administration (e.g., availability and location, fees, reporting of results).

***Commentary:***

- A. Suggested evidence to document that the Standard has been met may include a candidate handbook, brochures about the certification program, and other public documents.



## Standard 8

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**The certification program must award certification only after the knowledge and/or skill of individual applicants has been evaluated and determined to be acceptable.**

***Essential Elements:***

- A. If any current certificants (at the time the application for accreditation is made) were granted certification without having to meet the examination requirements established for certification, a rationale must be provided to explain how the competence of those individuals was evaluated and found to be sufficient. The period during which such test exemptions were granted must have been terminated before the certification program is eligible for accreditation.
- B. Once a program is accredited, “grandfathering,” or any other procedure for granting a credential in the absence of evaluating the knowledge and/or skill of an individual, is not acceptable.

***Commentary:***

- A. Grandfathering is generally seen as a conflict with stakeholder interests. It is used from time to time in licensure as a means of protecting the rights of individuals who entered a profession prior to its regulation and should not be excluded from the right to practice. Professional certification does not normally carry such potential to restrict the right to practice.
- B. Suggested evidence to document that the Standard has been met may include a policy and procedures document, a candidate handbook, brochures about the certification program, and other public documents.

## Standard 9

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**The certification program must maintain a list of and provide verification of certified individuals.**

***Essential Element:***

- A. The certification program must maintain a list of current and previous certificants.

***Commentary:***

- A. The certification program should provide and verify that a certificant possesses currently valid certification upon request from any member of the public. Policies governing verification should allow disclosure of whether or not the certificant is currently in good standing, without communicating other information which may violate the confidentiality rights of certificants or applicants.
- B. The certification program may discard information about previous certificants after a reasonable time period when such information is no longer valuable to the certification program’s stakeholders.
- C. Suggested evidence to document that the Standard has been met may include a policy and procedures document, a candidate handbook, brochures about the certification program, directories in which certificant names are published, and other public documents.

## ASSESSMENT INSTRUMENTS

### Standard 10

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**The certification program must analyze, define, and publish performance domains and tasks related to the purpose of the credential, and the knowledge and/or skill associated with the performance domains and tasks, and use them to develop specifications for the assessment instruments.**

***Essential Elements:***

- A. A job/practice analysis must be conducted leading to clearly delineated performance domains and tasks, associated knowledge and/or skills, and sets of content/item specifications to be used as the basis for developing each type of assessment instrument (e.g., multiple-choice, essay, oral examination).
- B. A report must be published that links the job/practice analysis to specifications for the assessment instruments.

***Commentary:***

- A. No single method exists to define performance domains, tasks, and associated knowledge and/or skills. Appropriate strategies include (a) committees of representative experts to define performance domains and tasks and associated knowledge and/or skills, including a review of related practice- or job-based information, or a review of the information from a previous study (b) rating scales (e.g., frequency and importance) to identify and select critical performance domains, tasks, and associated knowledge and/or skills (c) collection of job/practice information using logs, observations of practice, and/or interviews, or (d) review of proposed performance domains, tasks, associated knowledge and/or skills, and rating scales by an independent panel of experts.
- B. Validation of performance domains, tasks, and associated knowledge and/or skills is typically accomplished by conducting a survey of current certificants and/or individuals providing services or performing a job consistent with the purpose of the credential. It is important to sample widely within the profession, occupation, or role, or among those who use or support a product, to ensure representation in terms of major practice areas, job titles, work settings, geography, ethnic diversity, gender, and work experience. Stakeholders such as educators, supervisors, and employers may be included, as appropriate. An adequate sample size should be used to ensure that the estimated level of measurement error is defensible.
- C. Analysis of ratings information collected in the survey should determine how and to what degree the performance domains, tasks, and associated knowledge and/or skills relate to the purpose of the credential. Linkages to the content of the assessment instruments should be based on the use of ratings data. Empirical algorithms or other psychometric methods used to analyze or combine ratings from different scales should be specified. Analyses of demographic information collected from survey participants should also be examined to evaluate representativeness of the findings.
- D. A table of specifications should be prepared for each assessment instrument specifying the weighting of performance domains, tasks, and associated knowledge and/or skills to be included. The weighting system should be based primarily on data collected from survey participants, with informed review and interpretation provided by a panel of subject-matter experts. Decision rules used to eliminate performance domains, tasks, and associated knowledge and/or skills from the specification table should be explained. The specifications may also include instructions to the item writers to be used in developing assessment instruments.

- E. Because rapid changes may occur in knowledge and/or skills and in technology, it is important that certification programs periodically review performance domains, tasks, and associated knowledge and/or skills in the specifications to ensure that they are current. Since it is impossible to specify with precision how often the review should be conducted, each certification agency should develop its own timeframe and rationale. For existing certification programs, any changes between new specifications and previous specifications should be noted and explained.
- F. Suggested evidence to document that the Standard has been met requires a complete report summarizing the results of the job/practice analysis, which may include:
- A description of the background and experience of subject-matter experts and professionals who participated in various phases of the job/practice analysis
  - Identification of the psychometric consultants or organization used to conduct the job/practice analysis or important phases of it
  - A description of methods used to delineate performance domains, tasks, and associated knowledge and/or skills
  - A copy of the job analysis survey, including all instructions, rating scales, open-ended questions, and background demographic information collected from participants
  - A description of the survey's sampling plan and its rationale
  - Documentation of survey results, including return rate, analysis of ratings data, algorithms or other psychometric methods used to analyze or combine ratings data, and a rationale supporting representativeness of survey findings
  - A table of specifications for each assessment instrument specifying weighting of the performance domains, tasks, and associated knowledge and/or skill, along with any decision rules used to eliminate any of these elements from the table of specifications
  - Date of the study and description of a plan to update periodically the job/practice analysis
- G. The formal report of the job/practice analysis study to be provided to demonstrate compliance with this standard may be considered by the organization to be a confidential document, and therefore, the organization may decide to not make it widely available. However, in these cases, the organization must publish and make available a summary of the study or statement(s) describing the exam specifications development process for dissemination to prospective candidates and other interested members of the public.

## Standard 11

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**The certification program must employ assessment instruments that are derived from the job/practice analysis and that are consistent with generally accepted psychometric principles.**

***Essential Elements:***

- A. Assessment instruments, including assessment items, exhibits, instructions to examinees, scoring procedures, and training procedures for administration of assessments, must be products of an appropriately designed and documented development process.
- B. The content sampling plan for test items or other assessment components must correspond to content as delineated and specified in the job/practice analysis.
- C. An ongoing process must exist to ensure that linkage between the assessment instruments and the job/practice analysis is maintained, as assessment components are revised and replaced over time.

This linkage between assessment content and job/practice analysis must be documented and available for review by stakeholders.

- D. Certification programs must follow a valid development process that is appropriate for assessment instruments.
- E. A systematic plan must be created and implemented to minimize the impact of content error and bias on the assessment development process. Assessment content must be reviewed by qualified subject matter experts.

***Commentary:***

- A. Documentation for assessments should include a detailed description of the delivery format for each portion of the assessment and the type of response required of candidates. Developers should take reasonable steps to ensure that modes of presentation and response are justified by job relatedness. If the form of the assessment instrument is to be delivered on computer, the documentation of item selection rules or display features should be described. Certification programs should document how background and experience factors of the candidate population were considered in selecting item types or other assessment formats.
- B. Qualifications of subject matter experts, assessment development professionals, content reviewers, and others involved in assessment development should be appropriate to the content area tested and assessment procedures used and documented.
- C. Training provided to item writers, item reviewers, and others who produce assessment content should be structured, delivered, and documented in a professional and consistent manner.
- D. The development and assembly process for assessment instruments should be documented.
- E. The development process should include pilot testing of new items with a representative sample of the target population, with revision based on statistical analysis of results, where appropriate.
- F. Certification programs should document procedures used to examine the performance of items or other assessment components and describe the criteria used to identify components for revision or removal from the assessment.
- G. The size of the item pool must be sufficient to sample specifications for the assessment and to provide adequate item exposure control to safeguard the security and integrity of the item bank and test forms, particularly in relation to computer-based administration.
- H. Provision should be made for monitoring continued validity of each assessment item and assessment form during the period in which they are active.
- I. Suggested evidence to document that the Standard has been met may include: specifications for the assessment instruments; training materials, agendas, and reports on item development; procedures for the development of assessment instruments; and technical reports.

## Standard 12

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**The certification program must set the cut score consistent with the purpose of the credential and the established standard of competence for the profession, occupation, role, or skill.**

***Essential Elements:***

- A. Cut scores must be set using information concerning the relationship between assessment performance and relevant criteria based on the standard of competence.

- B. A report must be published documenting the methods and procedures used to establish the standard of competence and set the cut score, along with the results of these procedures.

***Commentary:***

- A. No single method exists to set cut scores. Appropriate strategies include the use of judges or panelists who focus their attention on assessment content by rating each item or task, or who consider the candidates or their completed assessments.
- B. The raters in a cut score study must understand the purpose of the assessment, the standard of competence, and how to apply the cut score process that is to be used. Raters should have a sound basis for making required judgments. If data are available, estimates of the effects of setting the cut score at various points should be provided.
- C. The cut score study should be documented in sufficient detail to allow for replication, including full descriptions of the procedures followed, results, and how they should be interpreted.
- D. Suggested evidence to document that the standard has been met includes a report of the cut score study that addresses the following:
- Overview of the cut score process
  - Qualifications of those designing and implementing the process
  - Number of panelists, manner of selecting the panelists, and their qualifications
  - Material used
  - Data collection procedures
  - Descriptions or conceptualizations developed by the panelists
  - Data collection activities
  - Meeting agendas
  - Any adjustments made to the cut score by a governing body or policy group
- E. This formal cut score report may be considered confidential by the organization; however NCCA accreditation review requires that a formal report of the cut score be submitted with the application. In these cases, the organization must make available a summary of the study or statement regarding the study to prospective candidates and other interested stakeholders. The summary can be in journal articles, candidate bulletin, or other information accessible to candidates and stakeholders.

## Standard 13

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**The certification program must document the psychometric procedures used to score, interpret, and report assessment results.**

***Essential Elements:***

- A. The certification program must describe procedures for scoring, interpreting, and reporting assessment results.
- B. For responses scored by judgment, developers must document training materials and standards for training judges to an acceptable level of valid and reliable performance. Any prerequisite background or experience for selection of judges must also be specified.

- C. Candidates must be provided meaningful information on their performance on assessment instruments. Such information must enable failing candidates to benefit from the information and, if psychometrically defensible, understand their strengths and weaknesses as measured by the assessment instruments.
- D. Reports of aggregate assessment data in summarized form must be made available to stakeholders without violating confidentiality obligations.

***Commentary:***

- A. Certification programs are responsible for establishing quality control procedures that regularly monitor the precision of calculations used to compute assessment scores and their conversion to standardized, equated, or scaled scores, if performed.
- B. The certification program should publish an explanation of the appropriate uses and misuses of reported score information.
- C. Suggested evidence to document that the Standard has been met may include descriptions of scoring procedures, training documents, quality control procedures, and sample score reports for passing and failing candidates.
- D. Evidence in support of essential element D should include documentation of aggregate assessment data to the various stakeholder groups on interest. For example, details of the aggregate assessment data might be appropriately reported to representatives of the program sponsor (e.g. a board or committee) and documented in the NCCA Accreditation application. In addition, however, some aggregate data must be available to the public and the certificant population, at a minimum addressing the number of candidates and the number of individuals attaining the certification credential during a specified period of time.

## Standard 14

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**The certification program must ensure that reported scores are sufficiently reliable for the intended purposes of the assessment instruments.**

***Essential Element:***

- A. Certification programs must provide information to indicate whether scores (including any subscores) are sufficiently reliable for their intended uses, including estimates of errors of measurement for the reported scores. Information must be provided about reliability or consistency of pass/fail decisions. When appropriate, information should be provided about the standard error of measurement or similar coefficients around the cut score.

***Commentary:***

- A. The level of reliability required for an assessment instrument depends on the type of assessment device and the purpose for which scores will be used.
- B. Different types of assessment instruments require different methods of estimating reliability. Reliability should be estimated using methods that are appropriate for characteristics of the assessment instruments and the intended uses of the scores.
- C. Suggested evidence to document that the Standard has been met may include:
  - Methods used to assess reliability of scores (including subscores), and the rationale for using them
  - Characteristics of the population involved (e.g., demographic information, employment status)

- A reliability coefficient, an overall standard error of measurement, an index of classification consistency, an information function, or other methods for estimating the consistency of scores
- Standard errors of measurement or other measures of score consistency around the cut score
- Information about the speededness of performance on the assessment instruments
- Any procedures used for judgmental or automated scoring
- The level of agreement among judges

## Standard 15

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**The certification program must demonstrate that different forms of an assessment instrument assess equivalent content and that candidates are not disadvantaged for taking a form of an assessment instrument that varies in difficulty from another form.**

***Essential Elements:***

- A. Equating or other procedures used to ensure equivalence and fairness must be documented, including a rationale for the procedure used.
- B. When assessment instruments are translated or adapted across cultures, certification programs must describe the methods used in determining the adequacy of the translation or adaptation and demonstrate that information attained from adapted and source versions of the assessment instruments produce comparable test scores and inferences.

***Commentary:***

- A. Different ways exist to link assessment scores, ranging in rigor from strict equating models to judgmental methods.
- B. When certification programs use more than one mode of administration (e.g., paper/pencil and computer-based testing), it is important to document equivalence of score information and any score adjustment method used to achieve equivalence.
- C. A rationale should be provided for the reporting scales selected and methods used to determine score scales.
- D. The scales on which scores are reported should not encourage finer distinctions among candidates than can be supported by the precision of the assessment instruments. The scale values should be chosen in a manner that avoids confusion with other scales that are widely used by the same population of candidates.
- E. Raw scores should not be reported except under one or more of the following circumstances:
  - Only one form of the assessment instrument is to be offered
  - Scores on one form will not be compared with scores on another form
  - Raw or percentage scores on all forms are comparable, or
  - Raw or percentage scores are reported in a context that supports intended interpretations.
- F. When scaling scores, the stability of the score scale should be checked periodically. When indicated, steps should be taken to minimize score misinterpretations. If a change to the assessment instrument or to the composition of the candidate population alters the meaning of

scores, it may be appropriate to rescale the scores to minimize confusion between the old and new scores, or in the absence of rescaling, to ensure that the differences between the old and new scores are clearly communicated to candidates and to other stakeholders.

- G. Certification programs should, whenever possible, conduct pilot studies prior to implementation of the adapted version of the assessment instruments. Field study research should be part of a program of ongoing maintenance and improvement. Tryout and field studies should be part of a larger research program to ensure comparability and quality of cross-cultural information on the assessment instruments.
- H. Suggested evidence to document that the Standard has been met may include:
- A description of the methods used to determine that different forms of an assessment instrument measure equivalent content and ensure that candidates are not disadvantaged for taking a form of the assessment instrument that varies in difficulty from another form
  - An equating and scaling report

## Standard 16

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**The certification program must develop and adhere to appropriate, standardized, and secure procedures for the development and administration of the assessment instruments. The fact that such procedures are in force should be published.**

***Essential Element:***

- A. Assessment instruments must be administered securely, using standardized procedures that have been specified by the certification program sponsor.

***Commentary:***

- A. Non-standardized administration procedures may adversely influence scores as well as the inferences drawn from these scores. When administration procedures deviate from the expected, such irregularities must be thoroughly documented.
- B. Chief examiners and proctors should be thoroughly trained in proper administration of the assessment instruments in an effort to minimize the influence of test administration on scores. Similarly, all candidates should have equal access to preparatory materials and instructions available from the sponsor.
- C. Certification programs are responsible for protecting the integrity of assessment information. This responsibility requires a security program that restricts access to assessment information to authorized personnel.
- D. Administration sites should offer similar conditions, such as adequate lighting, comfortable seating, and an environment free from noise and other distraction.
- E. Suggested evidence to document that the Standard has been met may include:
- Candidate handbook or similar document
  - Chief examiner and/or proctor manual
  - Quality control policy and procedures documents
  - Security procedures manual



## Standard 17

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**The certification program must establish and document policies and procedures for retaining all information and data required to provide evidence of validity and reliability of the assessment instruments.**

***Essential Element:***

- A. Policies and procedures must ensure that items and forms of the assessment instruments are stored in a medium and method that emphasizes security, while being accessible to authorized personnel. Such policies must not only describe procedures for a secure system but also address actions required of personnel.

***Commentary:***

- A. Policies should establish a time period for retention of physical or electronic copies of forms of the assessment instruments and of reports and analyses related to the development process. The documents may be used in matters relating to challenges concerning scores, validity, or other essential issues. Documentation of the secure retention of assessment instruments and development information (e.g. cut score studies, technical reports) must be provided as part of the NCCA Application Accreditation. Note here how this information is securely maintained.
- B. Suggested evidence to document that the Standard has been met should include policy and procedures documents.

## Standard 18

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**The certification program must establish and apply policies and procedures for secure retention of assessment results and scores of all candidates.**

***Essential Element:***

- A. Organizational policy must determine the length of time that assessment results will be retained.

***Commentary:***

- A. Organizational policy concerning the length of time that assessment results will be retained and score reports provided should be stated clearly in information provided to candidates.
- B. Certification program policy should prevent assessment results and other personal information from the candidate's file being provided to a third party without the candidate's documented permission. The policy should be stated in information provided to candidates.
- C. Suggested evidence to document that the Standard has been met should include policy and procedures documents.

## RECERTIFICATION

### Standard 19

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**The certification program must require periodic recertification and establish, publish, apply, and periodically review policies and procedures for recertification.**

***Essential Elements:***

- A. The published policy must contain a statement of the basis and purpose for recertification and all recertification requirements.
- B. The rationale for the recertification time interval must be included in the policy.
- C. Recertification policies and procedures in handbooks, guides, and/or electronic media must be published and made available to certificants and the public.

***Commentary:***

- A. An explanation of consequences for the certificant when recertification requirements are not met should be provided.
- B. In the case of a certification program involving a proprietary product or service, the proprietor may describe recertification on the basis of a systematic process of upgrading the product or service in connection with steps taken to withdraw technical support provided by the proprietor for the previous version of the product.
- C. Suggested evidence to document that the Standard has been met should include certification renewal policy and procedure documents and a candidate handbook.

### Standard 20

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**The certification program must demonstrate that its recertification requirements measure or enhance the continued competence of certificants.**

***Essential Element:***

- A. The purpose of periodic recertification, whether to measure continued competence or to enhance continued competence, must be stated. If the purpose of recertification is to measure continued competence of certificants, then the certification program must substantiate the validity and reliability of the assessment instruments used to measure continued competence. If the purpose is to enhance continued competence of certificants, then the certification program must demonstrate how the policy contributes to professional development of the individual certificant.

***Commentary:***

- A. Methods used to measure continued competence may include an up-to-date edition of the assessment instruments used for initial certification or assessment instruments designed specifically for recertification.
- B. Methods used to enhance continued competence should be provided, with an explanation of how the requirement supports professional development of the certificant.
- C. Suggested evidence to document that the Standard has been met should include certification renewal policy and procedure documents and a candidate handbook.

## MAINTAINING ACCREDITATION

### Standard 21

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**The certification program must demonstrate continued compliance to maintain accreditation.**

***Essential Elements:***

- A. The certification program must annually complete and submit information requested on the current status of the certification agency and its programs.
- B. The certification program must report any change in purpose, structure, or activities of the certification program.
- C. The certification program must report any substantive change in examination administration procedures.
- D. The certification program must report any major change in examination techniques or in the scope or objectives of the examination.
- E. The certification program must submit any information NCCA may require to investigate allegations of lack of compliance with NCCA Standards.

## Glossary

**Accommodation—**

A reasonable modification in an assessment instrument or its administration made to compensate for the effects of a qualified disability without altering the purpose of the assessment instrument.

**Accountability—**

Responsibility of a certification board, governing committee, or other sponsor of a certification program to its stakeholders to demonstrate the efficacy and fairness of certification policies, procedures, and assessment instruments.

**Accreditation—**

1. **General use:** Approval of an educational program according to defined standards.
2. **As related to NCCA:** Status awarded to a certification program that has demonstrated compliance with the *Standards for the Accreditation of Certification Programs* set forth by the National Commission for Certifying Agencies.

**Administrative Independence—**

An organizational structure for the governance of a certification program that ensures control over all essential certification and recertification decisions without being subject to approval by or undue influence from any other body. See Autonomy.

**Applicant—**

An individual who declares interest in earning a credential offered by a certification program, usually through a request for information and the submission of materials. See Candidate.

**Assessment Instruments—**

Any one of several standardized methods for determining if candidates possess the necessary knowledge and/or skill related to the purpose of the certification.

**Autonomy—**

Control over all essential certification and recertification decisions without being subject to approval by or undue influence from any other body. Autonomy in the management and administration of certification enhances the ability of certification programs to serve stakeholder interests, primarily those of consumers of professional services. See Administrative Independence.

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**Bias—**

IN THE CONTEXT OF SCORING: a systematic error in a score on an assessment instrument.

IN THE CONTEXT OF EXAMINATION FAIRNESS: may refer to the inappropriateness of content in the assessment instrument, either in terms of its irrelevance, overemphasis, or exclusion.

IN THE CONTEXT OF ELIGIBILITY AND RECERTIFICATION REQUIREMENTS: may refer to the inappropriateness or irrelevance of requirements for certification or recertification if they are not reasonable prerequisites for competence in a profession, occupation, role, or skill. See Fairness.

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**Candidate—**

An individual who has met the eligibility qualifications for, but has not yet earned, a credential awarded through a certification program. See Applicant.

**Certificant—**

An individual who has earned a credential awarded through a certification program.

**Certification—**

A process, often voluntary, by which individuals who have demonstrated the level of knowledge and skill required in the profession, occupation, role, or skill are identified to the public and other stakeholders.

**Certification Agency—**

The organizational or administrative unit that offers and/or operates a certification program.

**Certification Board—**

A group of individuals appointed or elected to govern one or more certification programs as well as the certification agency, and responsible for all certification decision making, including governance.

**Certification Committee—**

A group of individuals appointed or elected to recommend and implement policy related to certification program operation. (See governing committee)

**Certification Program—**

The standards, policies, procedures, assessment instruments, and related products and activities through which individuals are publicly identified as qualified in a profession, occupation, role, or skill.

**Commentary—**

Comments, remarks, and observations that clarify terms, provide examples of practice that help explain a standard, or offer suggestions regarding evidence that must be documented to demonstrate compliance.

**Content Domains—**

The set of organized categories characterizing subject matter under which knowledge and skills may be represented in specifications for assessment instruments.

**Consumer—**

See also “Public Member”

**Continuing Competence—**

The ability to provide service at specified levels of knowledge and skill, not only at the time of initial certification but throughout an individual’s professional career. See Recertification and Continuing Education.

**Continuing Education—**

Activities, often short courses, that certified professionals engage in to receive credit for the purpose of maintaining continuing competence and renewing certification. See Recertification and Continuing Competence.

**Cut Score—**

A specific score on an assessment instrument or instruments at or above which passing decisions are made and below which failing decisions are made.

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**Discipline—**

A formal, published process for the enforcement of standards governing the professional behavior (i.e., ethics) of certificants.

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**Eligibility Requirements—**

Published criteria, often benchmarks for education, training, and experience, with which applicants must demonstrate compliance in order to qualify for certification.

**Equating—**

A statistical process used to convert scores on two or more alternate forms of an assessment instrument to a common score for purposes of comparability and equivalence.

**Essential Element—**

A statement that is directly related to a Standard and specifies what a certification program must do to fulfill the requirement of the Standard.

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**Fairness—**

The principle that all applicants and candidates will be treated in an equitable manner throughout the entire certification process. See Bias.

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**Grandfathering—**

The process by which individuals are granted certification without being required to meet a formal examination requirement. This process is frequently invoked when a certification program is initiated, as a way of recognizing the experience and expertise of long-term experts, and/or to allow grandfathered individuals to develop the initial form(s) of the certification examination. Individuals initially certified through grandfathering may, in the future, be required to pass a form of the certification examination they did not participate in developing in order to maintain certification.

**Governing Committee—**

A group of individuals appointed or elected to formulate and implement policy related to certification program operation. The NCCA uses this term to denote those committees that are given complete authority over all essential certification decisions.

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**Incorporation Status—**

Legal recognition granted by states to organizations; determines IRS classification as for-profit or nonprofit.

**Item—**

A general term referring to problems and/or questions that appear in assessment instruments and to which candidates must respond.

**Item Bank—**

The system by which test items are maintained, stored, and classified to facilitate item review, item development, and examination assembly.

**Item Type or Format—**

The structure of a problem or question in an assessment instrument (i.e., multiple choice, open-ended).

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**Job/Practice Analysis/Role Delineation Study—**

Any of several methods used singly or in combination to identify the performance domains and associated tasks, knowledge, and/or skills relating to the purpose of the credential and providing the basis for validation.

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**Parent Organization—**

The legal entity under which a certification program is established when the certification program is governed as part of a larger organization.

**Performance Domains—**

The set of organized categories characterizing a role or job under which tasks and associated knowledge and/or skills may be represented in the job/practice analysis.

**Public Member—**

A representative of the consumers of services provided by a defined certificant population, serving as a voting member on the governing body of a certification program.

**See also “Consumer”**

**Publish—**

Make available in hardcopy, electronic, or web-based formats and easily accessible and available on request. The degree of accessibility may be a function of the level of confidentiality of the information.

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**Recertification—**

Requirements and procedures established as part of a certification program that certificants must meet in order to ensure continuing competence and renew their certification. See Continuing Competence and Continuing Education.

**Reliability—**

The degree to which the scores on an assessment instrument are free of measurement error.

**Role—**

A more specific or narrower set of knowledge and skills than may be encompassed by the term *profession* or *occupation*, and may also be the focus of certification for a particular product or service to the public.

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**Self-Assessment—**

A process by which an assessment instrument is self-administered for the specific purpose of providing performance feedback rather than a pass/fail decision.

**Stakeholders—**

The various groups with an interest in the quality, governance, and operation of a certification program, such as the public, certificants, candidates, employers, customers, clients, and third party payers.

**Standard—**

An accreditation requirement that must be met by a certification program submitting an application to the National Commission for Certifying Agencies.

**Standardization—**

IN THE CONTEXT OF ASSESSMENT INSTRUMENTS: ensuring that the process is conducted according to a specified plan in order to provide the same conditions for all candidates.

IN THE CONTEXT OF SCORING: ensuring that candidate responses are judged using predefined criteria in order to provide a consistent basis for evaluating all candidates.

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**Technical Report—**

A summary of psychometric procedures and their results as implemented in the assessment instruments used in a certification program, often addressing such issues as content validity, item writing, test assembly, reliability analysis, cut score development, scoring, and equating.

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**Undue influence—**

Control of decision making over essential certification policy and procedures by stakeholders or other groups outside the autonomous governance structure of a certification program.

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**Validity—**

The degree to which accumulated evidence supports specific interpretations of all components of a certification program (e.g., education, experience, and assessment instruments).



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