

**December 7, 2007**

**ANSI's Comments on NASAA's Model Rule**

The American National Standards Institute strongly supports in concept the NASAA Model Rule on the use of Senior-Specific Certifications and Professional Designations. The model rule is necessary due to the wide diversity and quality of programs developed and marketed by those who publicly state they “certify” people with a special body of knowledge. Without the use of a nationally accepted standard to evaluate the quality of personnel certification bodies, consumers (and most particularly Seniors) will not be able to determine if the individual has acquired the necessary specialized body of knowledge to assist them in their financial decisions.

Although ANSI supports this proposed rule, there are specific areas that we believe need to be revised. On page 1, paragraphs 1 the use of the word “professional designation” needs to be removed. There are two reasons for making this suggestion. First, if a professional designation includes a “degree” or a “certificate issued at the end of training of an educational course” or an honorary credential for years of high quality work and professional expertise, different criteria should be used to evaluate the quality of these other types of credentials. It should be noted, the accrediting bodies identified in the proposed rule only accredit “certification bodies”.

Second, the use of the words “professional designation” becomes more problematic when used in section 1(d) with “certification” and “certifying organization”. Agencies who award professional designations often would not meet the criteria in (d) (ii) (iii) (iv). These are criteria specific to certification bodies. In addition, the statement in (d)(i) indicates that being identified as an educational organization is good, but it is just as problematic when the organization primarily is ( or is closely conjoined with), a marketing organization because of the need for a fire wall between training/education and certification.

In regard to the first paragraphs on page one, ANSI would support the more detail wording of the first para 1. The more specificity in defining the scope of this rule may prevent further “loopholes” for individuals who may say the scope does not apply to them.

In 1(d) (ii) (iii), the use of the words “meaningful standards” is not measurable. Use of words like “valid” or “measurable” would provide more quantitative means for determining if the standards or procedures are appropriate and if they have been achieved. The same would be true regarding the use of the words “meaningful continuing education requirements” in 1(d) (iv).

In para 2, the sentence “For purposes of this rule, a designating or certifying organization is presumed to be an educational organization... would not be correct. Certification bodies are often free standing or affiliated with trade and/or professional associations. They generally do not exist in educational institutions.

In para 3, it will be important to separately address special certifications and training. These are very different concepts with certification requiring much more documentation of the science needed to determine specialized knowledge than a training course with an assessment tool. The mechanisms for evaluating the level of competency are not at the same level of scrutiny.

Paragraph 5 should be deleted. Higher Education Accreditation does not specifically evaluate the content outcomes of an educational program. Accreditation in this context evaluates structure, process and resources and does not evaluate specific course content. The accrediting bodies do not want to be held accountable for evaluating specific courses and if the assessment tools evaluate the content learned. That is not currently their role.

It is ANSI’s opinion –based on years of experience with certification and accreditation programs this proposed rule should not mix the concepts of certification, certificate and university degrees with the same evaluative criteria. Each mechanism does evaluate competencies in different degrees and each has its own merit and value in particular settings, but only certification exists to “protect the public”. In this case, the public policy concern articulated by NASSA that Seniors need to be protected in the marketplace – should lead to the conclusion that individuals who are providing the specialized services must be held to the highest standards of accountability.