



November 29, 2007

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Rex Staples
NASAA
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RE: PROPOSED ADOPTION OF A NASAA MODEL RULE ON THE USE OF SENIOR-SPECIFIC CERTIFICATIONS AND PROFESSIONAL DESIGNATIONS

Society of Certified Senior Advisors (SCSA) welcomes the opportunity to submit comments on NASAA's proposed rule regarding senior-specific certifications and designations.

SCSA supports a single national standard for credentials to give clear rules of the road to professionals, companies, credentialing organizations and the public.

Accreditation will give the public, professionals, regulators and companies confidence in a credential. To avoid confusion about what a designation is and is not, or the ability of someone to misrepresent a credential, we support the procedures FINRA recommends to assure that designations are not used in a misleading manner; namely "appropriate disclosure about what a designation does and does not signify."

We therefore recommend that NASAA expand its rule to require that designations adopt an accurate disclosure statement. The CSA disclosure statement reads:

Certified Senior Advisors (CSA) have supplemented their individual professional licenses, credentials and education with knowledge about aging and working with seniors. Know what those licenses, credentials and education signify. The CSA designation alone does not imply expertise in financial, health or social matters. Details: www.csa.us

Few seniors can be expected to know what someone's credentials mean. This lack of understanding makes it incumbent on credentialing organizations to spell out what they confer and what they don't. The answer is not to discourage the education behind

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credentials, or to require that someone conceal their credentials or education. Full disclosure limits the ability of an unscrupulous person to misrepresent a credential and increases the consumer's ability to make informed choices about whom they work with.

Thank you for the opportunity to comment on this model rule and for your consideration.



Edwin J. Pittock, CSA
President

EJP/oa