



**National
Healthcareer
Association**

"The Benchmark In Allied Healthcare Certification"

National Healthcareer Association Certification Board Policies and Procedures

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NHA Certification Board Policies and Procedures

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NHA Certification Board Policies and Procedures

I. Purpose and Responsibilities of NHA Certification Board

The purpose of the NHA Certification Board (CB) is to ensure that NHA certification is a current, valid and reliable credential. The CB operates in the best interests of the general public, the allied healthcare industry and the certificant members of the NHA by establishing the highest quality standards and testing materials, policies and procedures. The CB is established as separate and autonomous board from NHA, Inc. and as of Fall 2009 has jurisdiction only for these select NHA certifications:

- Certified Phlebotomy Technician (CPT)
- Certified Billing and Coding Specialist (CBCS) and the
- Certified Clinical Medical Assistant (CCMA).

The allied healthcare system must be assured that the NHA certification process represents the requisite competencies for persons to perform their jobs safely and effectively. The responsibilities of each Board Member (Member) of the CB, and the CB as a whole, include (but are not limited to):

A. Members should stay current on the policies and health care trends within both the allied health care industry, as well as the above certification fields as a whole.

B. Members are expected to provide leadership and expertise to the NHA, the CB and NHA staff in order to update and improve the certification processes.

C. Members should become familiar with all aspects of the certification process and use their knowledge and expertise to ensure the process maintains the highest quality, fairness and reliability.

D. Members are required to attend all CB meetings preferably in person, or should initiate arrangements to attend by conference call. The members are required to be adequately prepared for all meetings, including a thorough understanding of the meeting agenda.

E. Members should be prepared to participate as needed on subcommittees and to act as subject matter experts if agenda items fall within the member's field of expertise.

F. Members should fully disclose to the CB any potential conflicts of interest and refrain from voting where there is apparent conflict.

G. The CB is responsible for a periodic Job Task Analysis Survey (JTA) for its certification exams. The current policy for updating the JTA is at least every five years. The CB decides by majority vote when the next JTA will be conducted and has authority to conduct a JTA when deemed necessary.

H. The CB is responsible for implementing an appropriate standard setting procedure for each new form of the exam. Should annual or ongoing updates of the minimum passing score be completed, a full, new standard setting procedure will be completed on the exam at least every five years.

I. The CB shall be solely responsible for all policies, procedures, and development of the exams under its jurisdiction only, including, but not limited to:

1. Developing the Item Bank
2. Hiring of the Executive Director, Psychometrician or outside consultants
3. Approval of NHA Certification Board Policies and Procedures
4. Approval of eligibility requirements and application policies
5. Approval of registration policies and procedures
6. Approval of the certification exams
7. Approval of the standard setting method for determining the passing score
8. Approval of Candidate Handbooks
9. Approval of the Code of Ethics
10. Convening the JTA Committee and conducting the JTA as needed
11. Convening the Appeals or Disciplinary Panel as needed
12. Approval of the various exam policies and procedures, including
 - a) Exam development procedures
 - b) Appeals Process
 - c) Recertification Process
 - d) Confidentiality Policy and Procedures
 - e) Disciplinary
 - f) Nondiscrimination/ADA

J. The CB will not determine:

1. Pricing of any other NHA exam or any other NHA fees not under its jurisdiction
2. Marketing or sales strategies for any exam not under its jurisdiction
3. Policies for any other NHA exam not under its jurisdiction.

K. Members have the individual responsibility to use the best ethical and professional standards of conduct to represent the certificant population and to operate in the best interest of the general public. Members have the responsibility, first and foremost, to each member of society, to other allied healthcare professionals, and to self. The following principles were revised from the **NHA Standards of Conduct – Core Values**. All members of the CB agree to:

1. Use best efforts for the betterment of society, the profession, and the members of the profession.
2. Be totally honest in all dealings and not lie, cheat, or steal, nor tolerate anyone who does.
3. Be dedicated to providing safe, effective, and competent procedure execution, with compassion and respect for human dignity and rights.
4. Uphold the standards of professionalism and be honest in all professional interaction.
5. Respect state and federal laws and also recognize a responsibility to seek changes in those requirements that are contrary to the best interests of members of society.
6. Respect the rights of clients as well as all members of society, colleagues, and other medical, health, certified professionals and shall safeguard confidences and privacy within the constraints of the law.

7. Continue to learn, apply, and advance scientific and practical knowledge and skills, stay up to date on the latest research and its practical application, maintain a commitment to education, make relevant information available to colleagues and the general public, and obtain consultation and use the talents of other allied health care experts when indicated in order to continuously improve the state of the industry.
8. Participate in activities contributing to the improvement of personal health, our society, and the betterment of the allied health industry.
9. Continuously act in the best interests of the general public.
10. Support fair and equal access to allied health training for all people.

II. Executive Director Responsibilities

The CB has the authority and responsibility to hire an Executive Director for the CB. The Executive Director will be responsible for the day-to-day management and administration of all the policies and procedures enacted by the CB. The CB's Executive Director major responsibilities (although others may be assigned) to the CB are to:

- A. Ensure that all policies and procedures mandated by the CB are implemented.
- B. Ensure that financial resources are available to fund the CB policies and procedures for the certification process. The Executive Director is responsible for making sure all CB activities are fully funded at all times. The CB, the Executive Director, and the NHA-BOD will develop an annual budget to insure the long-term success and profitability of the NHA. The Executive Director reports to the CB regarding compliance with all budgetary guidelines.
- C. Ensure that equipment and personnel resources are available to effectively administer the certification process.
- D. Notify the CB when any committees (Appeals, Disciplinary Panel, JTA) need to meet.

III. Authority and Resources of the NHA Certification Board

A. Authority

The authority of the CB ensures that its structure and policies protect against undue influence from NHA Inc. or other sources and provides for autonomy. The CB sets all rules, policies, and procedures for the certification process of the select exams under its jurisdiction. The CB serves as a governing body of the NHA and controls decision making over essential certification policies and procedures for these select exams. The CB is a separate and autonomous governing body whose existence is absolutely essential for the success of the National Healthcareer Association; therefore, the NHA will be financially responsible to the CB and will fund any and all activities the CB deems appropriate and necessary to insure the NHA certification exam process, procedures, and administration are delivered in the professional, ethical, valid, and reliable manner. This has been mandated in the NHA, Inc. Corporate Bylaws.

B. Resources

NHA, Inc. is mandated to deliver resources to the requests of the CB. These requests may include, but are not limited to financial resources, manpower resources, plant and equipment resources and logistical and administrative resources. National Healthcareer Association, Inc. has operated successful certification activities for over 15 years. During this time, NHA Inc. has provided all necessary resources for successful operation and will maintain or improve upon the resources currently provided for the certification processes. NHA, Inc. and the CB will act to ensure it has sufficient financial resources to conduct effective and thorough certification and recertification activities. The following is a partial list of the resources available to effectively and efficiently implement all of the policies and procedures of the CB.

1. The NHA building headquarters has an approximately 5,000-square-foot office suite at 7 Ridgedale Ave, Cedar Knolls, NJ, 07927. The building houses 11 separate offices. The headquarters has internally locked doors and locked fire-retardant file cabinets to house all tests and testing materials. The remaining areas of the building support all aspects of the certification process: test scoring, test support, accounting, personnel, information technology, systems design, systems support, graphic arts, customer support, applicant processing, shipping and receiving, mail processing and other resources for the certification process.

2. The NHA houses 19 workstations complete with multi-station phones and computers. The customer support stations have restricted access only to the information required to perform quality customer service activities. In total, the NHA office suite has over 30 active computer stations. The Information Technology Department uses modern technological security protocols and all of the computers are secure and password-protected.

3. The NHA office suite houses telecommunications, including 22 potts lines, 34 telephone extensions, giving the NHA the capacity to handle over 22 phone lines (voice and/or data).

4. The NHA office suite houses substantial technological equipment, including, but not limited to: two industrial-sized, state-of-the-art printer machines with scanning and emailing capabilities, high-volume laser printer, individual ink-jet printers at computer stations, UPS/DHL shipping station, USPS shipping/ mailing station, computerized bar-coding mailing system and commercial-grade graphic arts information technology hardware and software.

5. The NHA has hired all the personnel required to implement the CB policies and procedures, which includes (but is not limited to) the key staff of:

Executive Director: Cynthia M. Orr

Director of Operations: Diane Riffel

Finance: Tyson Needham

Director, Administration and Processing: Victoria Marmol

Accreditation and Psychometric Consultant (outsourced): Sandra Dolan, PhD

6. Job Descriptions of Key Staff:

Executive Director. Please see description in Section II.

Director of Operations. Responsible for the office management, shipping and receiving, office supplies and administration, office logistics, and office maintenance. Manages all resources to ensure continuous compliance with all NHA Certification Board procedures, policies, guidelines, and protocols.

Comptroller. Responsible for all business aspects of the NHA including bookkeeping, accounting, banking and credit card transactions.

Director, Administration and Processing. Responsible for the smooth operation of examination services, including test grading and score operations, entering scores and other appropriate data into the secure NHA database, accurate printing and mailing of certificates, pass letters, certification wallet cards, and fail letters. All data on Candidates/Certificants must be accurately entered into the designated secure Processing Department Computer, and all NHA Security Protocols must be adhered to. Manages all aspects of the CB testing process and Security Protocols according to CB Procedures, Policies, and Protocols. This department is responsible for interaction between the Service Department and all NHA Candidates and Certificants. The Director manages personnel who take incoming calls, emails, mail, faxes, or other correspondence from people interested in the allied healthcare industry who are interested in becoming NHA certified, or the general public inquiring on the status of an NHA Candidate or Certificant. DA manages personnel that are required to know and understand the NHA Policies, Procedures, and Protocols for the entire NHA Certification Process. Manages personnel and systems to register candidates for NHA Exams, data entry of all pertinent candidate data, receipt and processing of payments, and accounts for payments for NHA Examinations. The Director manages Continuing Education Unit (CEU) and Recertification Services. The CEU department is responsible for processing all incoming CEU calls, queries, forms, CEUs, and updates, and is also responsible for certificant data entry information, printing renewal certificates with new expiration dates, updating certificant information, updating members on recertification policies, revisions, and protocols, and following NHA Certification Board directives to ascertain acceptability and eligibility criteria to determine if a Certificant's CEU activities meet NHA certification board eligibility criteria. The Director manages all other aspects of Candidate/Certificant administrative processing according to Certification Board Policies, Procedures, Guidelines, and Protocols.

Information Technology Manager. Responsible for managing all computer equipment functions, maintenance, software, hardware, and computer related equipment. Supervises the maintenance, upgrade, and revision of the NHA Website and the marketing department. The IT Manager has primary responsibility for the safeguard of all NHA computer files, server files, and related areas, and designs and maintains the appropriate Security Programs and Protocols for the Testing Department Computer and all other computers in the NHA. The IT. Manager also ensures that the NHA Testing Department Computer and files are secure, autonomous, complete, and separate from all other computer systems within and without the NHA. Manages all IT functions to ensure that all NHA Certification Board policies, procedures, guidelines, and protocols are adhered to.

C. Division of Responsibilities in the NHA Examination Development Process

In order to demonstrate to the general public, potential NHA candidates and the Membership of the NHA that the NHA Certification Examination process is protected from undue influence, the Board of Directors has amended the NHA, Inc. Corporate Bylaws. The NHA, Inc. Board of Directors, as held accountable by the Corporate Bylaws, is prevented from having any undue influence over the policies, procedures, systems, or decisions made by the CB concerning any and all aspects of its certification process and will be responsible for upholding the highest standards and commitment to the health, safety, and welfare of the public. The CB has autonomy over and responsibility for developing, implementing, and maintaining all policies, procedures, guidelines, and systems to ensure only qualified professionals obtain and maintain the NHA credentials under its jurisdiction. The CB shall adopt any and all policies, procedures, guidelines, rules, regulations, and systems for the effective conduct of its operations as the CB shall require maintaining the highest quality standards. The CB may delegate certain of its day-to-day operational duties to the Executive Director. The CB shall be solely responsible for all policies, procedures, and development of the NHA Examination Process for its select exams, as described previously in these policies.

D. Autonomy

To ensure autonomy from the NHA, Inc., the CB is made up of at least seven (7) voting Board members and the Executive Director who is not a voting member. The CB has complete authority, responsibility, and autonomy from the NHA, Inc. for all aspects of the structure, policies, procedures, and decision-making concerning purpose, mission, governance, resources, and all other aspects of the selected certification exams and examination processes under its jurisdiction. To ensure autonomy and transparency of procedures, important actions and policies of the CB will be published. These include but are not limited to:

1. Nominations for the members on the CB
2. Elections of the members on the CB
3. Public posting of applicable documents, policies and procedures of the CB, such as:
 - a. Eligibility and application procedures
 - b. Candidate Handbooks
 - c. Examination development and content
 - d. Standard Setting
 - e. Appeals Process
 - f. Recertification Process
 - g. Confidentiality Policy and Procedures
 - h. Disciplinary Policy
 - i. Nondiscrimination/ADA

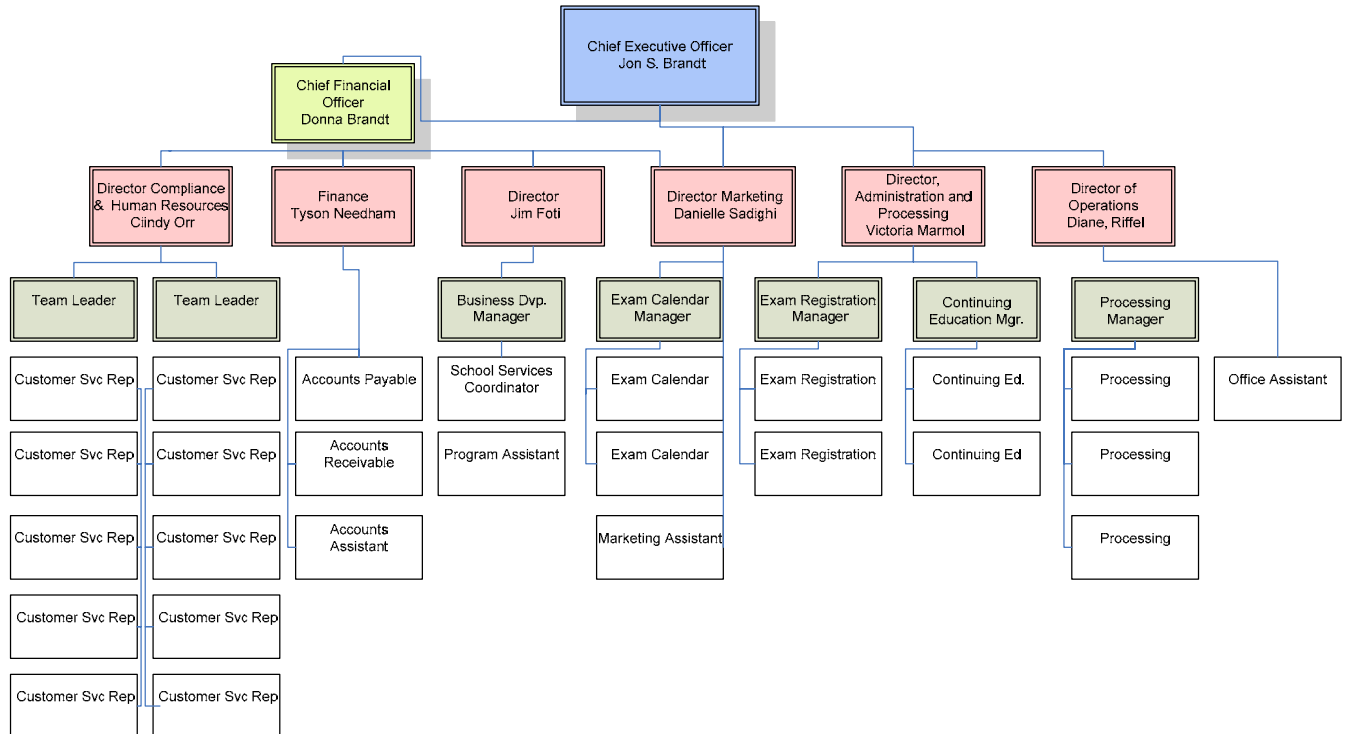
The CB policies and procedures are for our current and prospective certificants. They are revised periodically and published on the website. The CB has all authority over when documents are to be reviewed, revised, approved and published.

E. Separation from the NHA, Inc.

The CB will be autonomous from the education branch of the NHA, Inc. and the CB is removed from all aspects of the approval of training, courses of study or study materials leading to certification. Coursework, seminars, workshops or other educational materials will be delivered

by a separate arm of NHA, Inc. and any educational programs will be developed separately and autonomously from the responsibilities of the CB in order to maintain the credibility and security of the exams under CB jurisdiction. The following figure represents the 2009 NHA Organizational Chart and illustrates the autonomy of the CB from the NHA, Inc.

National Healthcareer Association Organizational Chart 2009



F. Procedures for Selection of NHA Certification Board Members

There will be a minimum of seven (7) voting CB members. Of these voting members, one member must meet the qualifications for a Public Member (without NHA certification) and represent potential clientele of the allied health industry. While the other seats are tasked with working for the continuous improvement of the industry, the Public Member will act to represent the populations we serve and ensure that all actions the CB takes are in the best interests of the public. For the remaining members, a member will be represented for each area of certification under the Certification Board's jurisdiction and must hold a current NHA certification in that area; one member must represent the NHA, Inc.; one member shall represent the healthcare industry; and one member shall represent education & training. All voting members shall serve 3-year terms. The CB Executive Director is an ex-officio (nonvoting) member who serves under the direction of the Board. Subsequent to the initial constitution of a Board seat, the selection process for CB members is as follows:

1. Six months prior to the term expiration of a CB member, the CB Executive Director will widely distribute requests for nominations to the NHA Certification Board seat or seats being vacated. The requests will include the qualifications for the specific seat or seats. Nomination requests will be sent by email, mail, website notice, and/or other means deemed appropriate by the NHA Certification Board.
2. The CB will review nominations to validate and qualify those nominated. Nominees for NHA Certification Board must have the qualifications required for the specific seat.
3. Following the CB's review, the Executive Director will contact qualified nominees to verify their willingness to serve and ability to comply with the demands of Board membership.
4. If willing and able to serve, the nominee will provide the Executive Director with a current resume and any supporting documentation (optional) describing their qualifications for the CB seat. At this time, the nominee will be asked to describe any potential conflicts of interest.
5. The CB will set the timeline for the submission of all nominations and for submission of all nominee resumes.
6. The CB will then direct the Executive Director to prepare the nominations, distribute the resumes and supporting documentation to NHA Certification Board members by email or mail, and/or other means deemed appropriate by the CB.
7. Elections will take place at a meeting of the CB, with a majority of the members' affirmation constituting selection. The responsibility for preparing election materials can be delegated to the Executive Director when deemed appropriate by the CB.
8. The CB Executive Director will ensure the proper and secure tabulation of votes and announce the winners for each CB seat.
9. The Chair of the CB will be elected by the CB by majority vote.

G. Current Certification Board Members

The 2009 constitution of the CB includes:

(nonvoting): Executive Director - Cynthia Orr, MA Ed. Admin.

Voting:

Seat 1: Public member - Ray Bramucci

Seat 2: NHA, Inc. representative - Diane Riffel

Seat 3: Healthcare Industry - Dennis Phallen

Seat 4: Education/Training - Dante Joa

Seat 5: CPT Certificant - Merrilyn Barto

Seat 6: CBCS Certificant - Kate Tierney

Seat 7: CCMA Certificant - Susan Yaws

IV. The NHA Certification Board Policies and Procedures

A. Eligibility and Registration

1. To be eligible to sit for the CB examinations the individual either 1) must have a High School Diploma, or equivalency, and recently successfully completed an NHA approved training program, OR 2) must have High School Diploma, or equivalency, and recently worked in the field of certification for a minimum of 1 year. Candidates must be able to provide written proof of experience by director or employer.

2. Exams are offered as either paper and pencil, or online, through a proctored and approved test delivery site. There are four ways for candidates to register for the examination: online, by mail, by fax or by phone.

3. All certificants must agree to abide by the following code of ethics.

“As a certified professional through the NHA, I agree to:

- Advance the profession in order to fulfill the basic needs of every member of society. I have a duty to use my best efforts for the betterment of society, the profession, and the members of the profession.
- Be totally honest in all dealings and not lie, cheat, or steal, nor tolerate anyone who does.
- Be dedicated to providing safe, effective, and competent procedure execution, with compassion and respect for human dignity and rights.
- Uphold the standards of professionalism and be honest in all professional interactions,
- Respect state and federal laws and also recognize a responsibility to seek changes in those requirements that are contrary to the best interests of members of society.
- Respect the rights of clients as well as all members of society, colleagues, and other medical, health, certified professionals and shall safeguard confidences and privacy within the constraints of the law.
- Continue to learn, apply, and advance scientific and practical knowledge and skills, stay up to date on the latest research and its practical application, maintain a commitment to education, make relevant information available to colleagues and the general public, and obtain consultation and use the talents of other allied health care experts when indicated in order to continuously improve the state of the industry.
- Participate in activities contributing to the improvement of personal health, our society, and the betterment of the allied health industry.
- Continuously act in the best interests of the general public.
- Support fair and equal access to training for all people.”

4. Additionally, the NHA Certification Board reserves the right to reprimand, suspend or revoke a member’s certification or take action for the following reasons:

- a) Cheating or collaboration on the exam. If an examinee is found cheating, he/she will be failed automatically. Any right to retake the exam will be forfeited as well as the right to retake the exam at a reduced rate.

- b) Unauthorized use of NHA proprietary materials and or copyright infringement with regards to exams, study guides and any other materials distributed as property of the NHA.
- c) Behavior that disregards the safety and rights of the patient.
- d) Material misrepresentation or fraud in any statement to NHA or to the public, including but not limited to statements made to assist the applicant, certificant, or another to apply for, obtain, or retain certification.
- e) Any violation of the law as defined by individual states. This includes felonies (Class A-E). If an examinee or a certified NHA member has been convicted of a felony and they wish to be considered for either exam registration or continuing education, individuals must submit court documents for consideration.
- f) Failure to meet the requirements for certification or recertification.

5. Cancellations. There are no refunds offered on certification exams unless the scheduled exam date is cancelled by the NHA. However, the exam fee may be transferred over to a new date for up to six months from the original date. A fee will be assessed each time an exam is rescheduled.

6. Special Accommodations (ADA). A “qualified individual with a disability” is one who has a disability and satisfies the requisite skill, experience, education and other requirements of the service, program or activity of which he or she is being measured; and with or without accommodations, can perform the essential functions of the service, program, or activity. An essential function is one that individuals are required to perform, and removing that function would fundamentally change the service, program, or activity. A person must be a “qualified individual with a disability” to be protected under the ADA.

Upon request, NHA shall make reasonable accommodations to assist candidates with disabilities. Special accommodations can be provided for individuals with documented disabilities by submitting a letter requesting special arrangements with the completed application. A current (within one-year of application) letter from a health care specialist knowledgeable of the candidate's disability stating the specific disability and his/her specific prescription for accommodations must accompany the completed application and letter of request. Requests for accommodations should minimally include:

- a) Documentation of the disability
- b) Accommodations requested for the examination
- c) Descriptions of past accommodations provided for in other educational or testing situations
- d) A current letter from a physician or other appropriate diagnostic health care specialist confirming the diagnosis of the disability and a prescription for specific accommodations.

Accommodations will be provided to qualified candidates with disabilities to the extent that such accommodation does not fundamentally alter the examination or cause an undue burden to the NHA or partner testing agent. The cost of excessive accommodation requirements is to be born by the candidate (i.e., electronic communication equipment, etc.). Examples of requests for special testing accommodations that may be granted include modification of seating or other physical arrangements in the testing facility or providing for the examination to be taken in an

accessible location, providing for a reasonable extension of testing time, providing an interpreter, reader or other auxiliary aid. Exams will not be translated into foreign languages and interpreters are not permitted to translate the examination.

7. English as a Second Language. The exam is written in the English Language. At this time there are no exams available in other languages.

8. Study Materials/Exam Review Workshop. After registering for the examination, the applicant may choose to receive a Study Guide electronically for \$7; for \$5 additional (shipping/handling) a printed version can be mailed. It is not required to purchase any study materials or workshops from the NHA in order to sit for the examination. However, the purchase of an NHA Exam Review Workshop or other study materials may be offered during the registration process to aid in preparing for the examination.

9. Grandfathering. The NHA Certification Board will not “grandfather” another certification, i.e., accept another organization’s certification or alternate pathway in lieu of meeting the eligibility requirements or for waiving a passing decision on the examination. All candidates must take and pass the required exam to receive certification.

10. Retaking the Exam. After initially failing an exam, the candidate will have two chances to retake the exam at a reduced price. A candidate must wait at least one month before retaking an exam. If the candidate is still unsuccessful after these two attempts, the candidate is required to take a refresher course and will have to retake at the full original price.

B. Exam Development

The NHA Certification Board evaluates the knowledge and skill of each applicant through testing and assessment. Only then will the NHA Certification Board award certification. The NHA Certification Board follows reliable and valid procedural processes for exam development. The CB will hire consultants, as necessary, to ensure that the certification process follows nationally recognized and accepted testing practices and principles.

1. The Job Task Analysis (JTA). Over time, constant improvements, reviews by SMEs, and updates on training have been made to ensure that NHA candidates have the requisite knowledge, skills, and abilities needed to perform and be successful in their career. As an ongoing effort to further define the areas of certification and to define the necessary skills for an entry level person in each certification area, a job task analysis should be regularly conducted according to accepted testing practices.

The CB is responsible for a periodic Job Task Analysis (JTA) for certification exams under its jurisdiction. The current policy is to update the JTA at least every five years. The CB decides by majority vote when the next JTA will be conducted and has authority to conduct a JTA when deemed necessary. The most recent JTA reports are summarized and published in the *Candidate Handbook*.

2. Item Writing. To provide instruction on the best item writing practices, SMEs and other item writers are distributed information on general measurement and testing principles, as well as specific item writing techniques (Exam Construction Guide, Dolan 2008). The goal of this Guide is to create clear and unbiased items which adequately test a candidate's knowledge in each of the designated content areas. The Guide is used as an educational tool and reference guide and provides information to the SMEs on Objective Measurement, Basic Principles of Testing, Planning the Test, General Item Writing Principles and Multiple Choice Item Writing. Additionally, the Guide provides information on what item bias is, the different kinds of bias, why bias is undesirable in testing and a Bias Checklist that the SMEs utilize when writing or reviewing items.

New items can be submitted by SME Committee members, as well as via submission by other SMEs authorized by the CB to participate in exam development activities. By having items written by a wider variety of experts, the CB can utilize this wider range of viewpoints to reduce content error and bias. Items will be reviewed and approved by the SME Committee members.

Requests for new items and modifications to existing items is an ongoing activity, which is heightened near the annual updating of the examination. Targeted item requests on certain domains may be necessary from time to time to better match the needs of the Table of Specifications. Item writers are requested to include a reference source for each item in order to minimize content error and to verify the correct answer.

At least annually, the SME Committee will create a new form and complete a standard setting procedure for this form, as described in the "Annual Exam Revision and Standard Setting" section of this document.

3. Exam Development Security. All items written for its exams must be kept in the strictest confidence. The CB and its SMEs go through enormous time, effort, energy, and expense to develop each and every item of its exams. Each participating SME or authorized personnel is required to take any and all steps necessary to protect each and every item from being seen and/or discussed by anyone other than authorized personnel. To reduce security threats, the participating SMEs/authorized personnel are selected for their integrity and dedication to the CB mission as well as their superior subject matter expertise.

SMEs/authorized personnel are limited to those individuals designated by the CB as having a need to know, such as the CB staff, psychometrician, SMEs for item writing/review for standard setting procedures and other individuals authorized by the CB.

All SMEs/authorized personnel are required to sign a non-disclosure statement that specifies that the participants recognize the importance of exam security, and that a breach of security jeopardizes the certification process, compromises the exams and negates the time, effort, energy, expense, integrity and purpose of all their hard work. SMEs/authorized personnel are instructed to follow the below instructions and explanations on each of the following areas of Exam Development Security:

- a) Do not discuss any aspect of the item or exam development with anyone outside of the SMEs or authorized personnel group.
- b) While participating in exam development activities during a meeting, never leave any materials unattended. At live meetings, do not remove materials from the meeting room.
- c) You are not permitted and will not allow anyone else to copy, photograph, or reproduce any items or exam development materials.
- d) You may not remove any items that you personally develop from the meeting site.
- e) You must destroy all copies, drafts, notes, and other development items relating in any way to the exam development process.
- f) Use of computers for item writing and exam development is permitted, provided that computer security measures are taken at all times.
- g) While working on exam development or item writing, the computer cannot be left unattended.
- h) Sensitive files must be password-protected and your password must be memorized or safely secured in a location to which no unauthorized individual can gain access.
- i) Transferring items or item materials over unsecured or unencrypted computer lines is expressly forbidden. Prior to sending items or any item-related information, you are required to ensure that the information is being sent by secure transmission to the CB or a designated representative.
- j) Before transferring items or item materials, contact the representative prior to transmission.
- k) Once item transfer is complete and the authorized representative confirms receipt, you will be advised to either delete all files pertaining to item writing materials and/or items, or to safely secure the required files, pending review by the CB or an authorized representative. Once review is complete, delete the materials.
- l) If the exam development materials or items are submitted by secure mail, the submitter should destroy all items and/or materials once the material is reviewed and accepted by the CB or an authorized representative.

C. Exam Administration/Proctoring

The CB exams are multiple choice exams administered via paper and pencil or internet-based at NHA approved testing sites.

1. Schools and other organizations can apply at no charge to become an approved NHA testing site. Once approved, the following policies apply.
 - a) Testing sites must submit a list of proposed exam dates and these dates must be approved by the *NHA*.
 - b) The examination proctor must be an employee of the school or testing site. The proctor's resume and Proctor's Oath must be submitted in advance and approved by the *NHA*.
 - c) The *NHA* will pay a fee to the proctor or directly to the school/testing site based on the number of examinees per test session.
 - d) If a school's site is used for the examination, it has the option to accept outside applicants. These professionals usually come from local hospitals, doctor's offices, and clinics, and have been pre-screened by the *NHA*.
 - e) The *NHA* will furnish the names of individuals who will attend the exam 24 – 48 hours before the scheduled exam date.

- f) All examinees must pre-register for the internet-based exams. At the discretion of the site, it may offer “walk in” testing for paper and pencil exams.
2. For the administration of a paper and pencil exam, the proctor will follow the specific requirements in the Proctors Oath regarding exam security, uniform testing conditions, seating arrangements, a maximum 30:1 examinee/proctor ratio, cheating, return of exam materials, etc. Examinee instructions for taking the paper and pencil exam are as follows.
- a) USE ONLY A #2 PENCIL.
 - b) Your full name, test ID and social security number must be clearly printed on the answer sheet in the appropriate boxes, as well as on the sign in sheet along with your complete mailing address. We must have a complete mailing address or we cannot process your exam and certifications.
 - c) **Do Not** write on the test booklet write only on the answer sheet. Anyone caught writing in the test booklet will be fined and risks being removed from the exam!
 - d) Please refrain from eating or drinking in the testing room.
 - e) Use of: beepers, radios, cellular phones, watch alarms, translators, dictionaries, and all other electronic devices are prohibited in the testing room. Please turn all electronic communications OFF.
 - f) Cheating of any kind will not be tolerated, including but not limited to: consulting textbooks or notes; discussing or reviewing any items on the exam with anyone else during the exam period; and talking to other students during the exam. If the exam monitor suspects anyone of talking or cheating during the exam, the monitor has the right to remove you from the testing room. You will have to retake the exam and be responsible to pay full price again if allowed to retest.
 - g) You should answer every question on the exam. If you are unsure of the correct answer, try to eliminate incorrect answers and take your best guess.
 - h) Test results will be sent to you via mail. Please do not call the office for results; the NHA will not release grades on the telephone. Please allow approximately 30 days after the test date.
 - i) The monitor will not answer any questions once the exam begins.
 - j) Please use the restroom facilities before the exam begins, you will not be allowed to leave the test room again until you complete the exam.
3. The general process for the internet-based exam includes:
- a) A day or so before the exam, NHA will provide a letter to the testing site that lists all of the examinees who have enrolled, the organizational codes, the examinee’s e-mail address and their password. For security purposes, testing sites are reminded to not release this list to anyone until the exam is proctored.
 - b) On the testing date and at the scheduled time, the examinee’s identify is verified and is checked in by the proctor.
 - c) The examinee is provided with a two minute PowerPoint presentation with instructions on how to take the examination along with the Exam Rules and Regulations.
 - d) The proctor accesses the epathcampus.com website.
 - e) The examinee accesses the login page, where they input their organizational code, e-mail address and the password provided to them by the proctor, then begins the exam.
 - f) Once the actual exam is administered, the examinee has 1 hour and 45 minutes to answer the questions, with a total testing time of a maximum 2 hours.

- g) At the end of the testing, the examinee is presented on screen with their preliminary (unofficial) score and pass/fail decision.

D. Annual Exam Revision and Standard Setting

The following is the process utilized for the annual updating of the exam and for item review and revision for exams under the CB jurisdiction.

- The CB will designate SME Committee members to participate in the Annual Exam Update
- Distribute to the SME Committee members a general Item Writing Guide and any other more specific organizational rules for item writing, review and revision.
- Complete an Item Analysis Report on exam form data from the past year to create a listing of the item statistics and item response frequencies. This Item Analysis Report will also specifically note and flag items that appear to be very difficult, very easy or misfitting.
- Since processes, practices and item answers may change over the course of a year, members of the SME Committee will review the entire set of exam items along with the item statistics as needed from the Item Analysis Report to evaluate whether the items are technically accurate, clear and relevant to current practice and have appropriate difficulty. Items will also be reviewed against NHA materials on industry standards.
- Flagged items from the Item Analysis Report will be especially evaluated and their statistics as well as item response frequencies reviewed. The SME Committee must decide for each item if it:
 - Is acceptable as is
 - Should be retired from the databank
 - Needs Revision
- Depending upon how many items are retired or revised from this review, the goal is to update the exam with at least 10% new or revised items each year. The SMEs will be requested to revise the necessary items and then to write new items in order to mostly closely match the requirements of the exam blueprint. Newly written items or revised items will be reviewed and approved by the Committee before being placed on a new exam form.
- To devise the passing standard for the new exam form, an (update) Angoff standard setting study will be completed on the new and revised items only. This process will mostly likely occur by conference call and/or email with 6-9 SMEs, where there will be a review of the exam characteristics and a discussion of the concept of the barely passing examinee. After these discussions, the new and revised items will be Angoff rated and the ratings from these new/revised items will be added to the Angoff ratings from the existing items. The average of the Angoff ratings will be translated into a minimum raw passing score for the new exam form. An Updated Standard Setting Report will be created that reports the processes followed and the results of the study.
- After publication of the exam, a “Quick” Item Analysis Report will be completed when approximately 100 exams are administered. The purpose of this analysis is to promptly identify possible errors in the answer key and to evaluate the performance of the new and revised items. This item analysis will flag items that appear to be very difficult or misfitting. The SME Committee will review the item analysis report and recommend any

actions that may be needed, such as correcting the answer key, revising items or dropping items from further scoring.

E. Exam Scoring and Reporting

Paper and pencil exam answer sheets are scanned and software is utilized to score the answer sheets and record the results electronically. Online exams are scored immediately by the web-based testing software and record the results electronically. All exam data is stored on the NHA's own servers.

Score results are sent directly to the applicant, with the exception of when a school registers one of its students for the examination. In the case where a school registers the examinee and pays for the examination for one of its students, the score results are sent directly to the school for distribution to its student. Score results are sent within approximately 30 days of the test date. A letter is included that reports the candidate's overall grade and if they passed or failed. If a candidate does not receive a passing score, they also receive information regarding retaking the exam. If a candidate passed, they also receive a wallet sized certification ID card and certificate with the NHA seal as proof of certification. Exam results can be appealed under limited and specific conditions stated in Appeals Policy.

F. Recertification

1. Purpose. The NHA Certification Board establishes policies and procedures for recertification for areas under its jurisdiction. The policies and procedures are reviewed and updated periodically. It is required that all certificants for exams under its jurisdiction participate in the recertification program to maintain active certification. NHA certificants are required to keep their certification current through annual continuing education activities.

The NHA recertification program validates the professionals' desire to stay current in their field of expertise. The health care field is in constant change and those certified must keep up with those changes. Therefore the NHA requires recertification every two years to stay current in the discipline, through evidence of at least 10 continuing education credits in every two year cycle.

The purpose of recertification is to ensure the certificant's commitment to staying current in his/her area of certification and to enhance their knowledge, skill and ability as professionals in their area of certification. The NHA recertification program encourages certificants to remain serious about their career by keeping their certification current. Industry changes and trends contribute to the need for all allied healthcare professionals to stay abreast of the latest information in their field through continuing education.

In order to support the purpose of recertification and to support NHA's commitment to ongoing education and training for its certificants and to protect the public, CB credentials are valid for two years and recertification through continuing education must occur every two years. This agrees with the general NHA recertification policy that states a two year period reflects a duration that accommodates the rate by which new information, skills and techniques are introduced into the allied health fields. The CB concluded that these credits and time interval:

- allow the certificant enough time to participate in CE activities that are most relevant to their personal practice
- allow the certificant to attend appropriate CE activities that are within a close-enough geographical distance so as to not burden the certificant with additional travel costs or loss of work time
- ensure that the certificant does not go for a long time period without continuing education

2. Length of Certification. Certification is valid for two years. Certificants are required to submit to the NHA evidence of at least 10 continuing education credits every two years to obtain recertification. Continuing education credits may be acquired through the NHA Continuing Education Program or through other outside educational programs or institutions. The NHA reviews credits based on the following criteria: current events, industry trends, and relevance to the allied healthcare field. If the credit meets any or all of the criteria, the credit will equal half the number of hours in attendance.

3. Submission of Documentation. Submission of continuing education credits and fees can be submitted to the NHA annually. Should continuing education credits and fees be submitted annually, upon approval of the five continuing education credits and the fees the certificant will receive a “CREDITS COMPLETED” sticker to apply to their Certification ID Card. Upon recertification, the certificant will receive a new wallet ID Card and Certification Certificate.

All recertification documents and fees must be submitted to the NHA national office by the certification’s expiration date, with a one month grace period. The required pieces are: 1) evidence of 10 continuing education credits and 2) annual fee of \$79.50 per year (\$159 total).

4. Reinstatement. Should a certification expire, reinstatement (recertification) is permitted within two years of the expiration date. If reinstatement is initiated within one year of the expiration date, the person must submit:

- evidence of 10 continuing education credits
- annual fee of \$79.50 per year (\$159 total), and
- \$99 reinstatement fee.

If reinstatement is initiated after one year of the expiration date but within two years of the expiration date, the person must submit:

- evidence of 15 continuing education credits
- fees of \$79.50 per year
- \$99 reinstatement fee.

After two years from the expiration date, reinstatement is not permitted and a person must apply and again take the examination to become certified.

G. Nondiscrimination

The NHA and CB do not discriminate or support the discrimination of or against any individual on the basis of gender, ethnicity, background, age, religion, marital status, national origin or physical disability.

H. Special Accommodations (ADA)

A “qualified individual with a disability” is one who has a disability and satisfies the requisite skill, experience, education and other requirements of the service, program or activity of which he or she is being measured; and with or without accommodations, can perform the essential functions of the service, program, or activity. An essential function is one that individuals are required to perform, and removing that function would fundamentally change the service, program, or activity. A person must be a “qualified individual with a disability” to be protected under the ADA.

Upon request, NHA shall make reasonable accommodations to assist candidates with disabilities. Special accommodations can be provided for individuals with documented disabilities by submitting a letter requesting special arrangements with the completed application. A current (within one-year of application) letter from a health care specialist knowledgeable of the candidate's disability stating the specific disability and his/her specific prescription for accommodations must accompany the completed application and letter of request. Requests for accommodations should minimally include:

- 1) Documentation of the disability
- 2) Accommodations requested for the examination
- 3) Descriptions of past accommodations provided for in other educational or testing situations
- 4) A current letter from a physician or other appropriate diagnostic health care specialist confirming the diagnosis of the disability and a prescription for specific accommodations.

Accommodations will be provided to qualified candidates with disabilities to the extent that such accommodation does not fundamentally alter the examination or cause an undue burden to the NHA or partner testing agent. The cost of excessive accommodation requirements is to be born by the candidate (i.e., electronic communication equipment, etc.). Examples of requests for special testing accommodations that may be granted include modification of seating or other physical arrangements in the testing facility or providing for the examination to be taken in an accessible location, providing for a reasonable extension of testing time, providing a reader or other auxiliary aid. Exams will not be translated into foreign languages and interpreters are not permitted to translate the examination.

I. Confidentiality

Confidential information (non-public information including, but not limited to, name, address, social security number, bank account numbers, financial or financial aid information, student numbers, medical information, certification numbers, etc.) are protected by federal, state and local statutes, including the Health Insurance Portability and Accountability Act (HIPAA). To

protect privacy, the database of personal information is accessible only by designated staff and contractors operating under a nondisclosure agreement. This database may also be used in aggregate (such as pass rates, number of certificants, score trends, etc.) for the purposes of research reports and other published data.

All candidate information including certification, registration and testing information will remain confidential, with the exception of whether a candidate has a current/active certification, i.e., "certification status". Written authorization by the candidate is needed to release their information (excluding certification status). An exception is the situation where a school registers and pays for its student's examination. In this case, the score results and certificates/card are sent directly to the school. Additionally, test scores will not be provided over the phone. This policy helps to maintain confidentiality for the student and helps ensure accuracy of results. The general public may access a candidate's certification status by calling the NHA.

J. Disciplinary

The NHA has established a code of ethics and guidelines in order to protect the public and the profession and certificants agree to follow the code of ethics and guidelines. The NHA reserves the right to reprimand, suspend or revoke a member's certification for the following reasons:

- 1) Cheating or collaboration on the exam. If an examinee is found cheating, he/she will be failed automatically. Any right to retake the exam will be forfeited as well as the right to retake the exam at a reduced rate.
- 2) Unauthorized use of NHA proprietary materials and or copyright infringement with regards to exams, study guides and any other materials distributed as property of the NHA.
- 3) Behavior that disregards the safety and rights of the patient.
- 4) Material misrepresentation or fraud in any statement to NHA or to the public, including but not limited to statements made to assist the applicant, certificant, or another to apply for, obtain, or retain certification.
- 5) Any violation of the law as defined by individual states. This includes felonies (Class A-E). If an examinee or a certified NHA member has been convicted of a felony and they wish to be considered for either exam registration or continuing education, individuals must submit court documents for consideration.
- 6) Failure to meet the requirements for certification or recertification.

To protect NHA's standards, while ensuring the credibility and rights of organizations and individuals participating in the NHA approved certification testing, a due process procedure is used when violations of standards that govern the administration of exams are suspected. This procedure involves: 1) Determining the existence of a possible violation, 2) Investigating the suspected violation, and 3) Communicating the findings and sanctions imposed, if any, to the affected parties.

If a consumer or other party makes a written and signed complaint to the NHA, the charged person will be notified of the complaint by registered mail. A written response concerning the

complaint is required to be submitted by the charged to a three-member CB Disciplinary Panel within 30 days. Scores or grades that are the subject of the investigation will be removed from the permanent record and placed in a file until the investigation is resolved. No grade reports will be issued reflecting credit for exams under investigation until the matter is resolved.

Upon review of complaint and evidence, the Disciplinary Panel will determine if further investigation is warranted. Based on its review after deliberation, and upon the affirmative vote of two-thirds of the Disciplinary Panel, the Disciplinary Panel shall determine whether grounds for disciplinary action exist and, if so, what disciplinary action should be taken. The Disciplinary Panel shall notify the charged member of their decision within thirty (30) business days by certified U.S. mail, return receipt requested. The charged member shall also be notified of his/her right to appeal.

K. Eligibility Appeals

The NHA reserves the right to deny registrations/applications that do not meet the eligibility requirements as set forth by the NHA Certification Board. Appeals to a denied application must be submitted in writing within 30 days of receiving the notice of ineligibility and must include an explanation of why the applicant thinks they should be eligible. Eligibility appeals will be reviewed by the CB and responded to in written form within 4-6 weeks. Appeals decisions will NOT be made available by telephone, fax or any other electronic means. Please send eligibility appeals to: National Healthcareer Association, Attn: NHA Certification Board (Appeals), 7 Ridgedale Avenue, Suite 203, Cedar Knolls, NJ 07927

L. Exam Question Challenge and Exam Appeals

- 1) Exam Question Challenge. Challenges that question the examination content or specific exam questions will be accepted and reviewed as part of NHA's quality control processes. Any challenges must be submitted in writing to the NHA within 5 business days of the completion of the exam and will be reviewed by NHA staff in consultation with subject matter experts, with the examinee being notified of the NHA response. However, the response will not include specific detail about the exam question in order to maintain the security of the item bank. This policy allows everyone to benefit from any legitimate challenges before grades are posted, while avoiding any unreasonable delays in the NHA's ability to process and deliver examinee's grades. Exam Question Challenges may be faxed to NHA, Attn.: Diane Riffel, (973) 644-4794, or may be sent via overnight courier to the following address: National Healthcareer Association, Attn.: Diane Riffel, 7 Ridgedale Ave, Cedar Knolls, New Jersey 07927.
- 2) Appeal of Exam Results/Certification Status. If there are any deviations from the CB policies, or improper behavior by a proctor, instructor or other examinee, persons should notify the NHA as soon as possible. If the incident occurs at a testing site, the incident must be brought to the proctor's (or an alternate testing supervisor's) attention at the time of their exam. Persons experiencing incidents or other behaviors in direct violation of any stated CB policy or procedure, or inappropriate behavior on behalf of an exam proctor or other examinees, are acceptable reasons to formally appeal exam results. The NHA must receive a written appeals letter from the examinee postmarked within thirty (30) days of his/her examination. The written appeals letter of the incident must include a detailed

explanation of the incident and how it affected their performance. The NHA will need verification and investigation of the event to render a decision. Exam appeals will be reviewed by the CB and responded to in written form to the examinee within sixty (60) business days of the postmarked appeals letter. The decision of the CB is final. Appeals letters should be submitted to: National Healthcareer Association, Attn: NHA Certification Board (Appeals), 7 Ridgedale Avenue, Suite 203, Cedar Knolls, NJ 07927.

M. Disciplinary Appeals

Decisions of the CB Disciplinary Panel may be appealed by the individual found to have been in violation on the following grounds only:

- The CB violated its policies and procedures for processing complaints of ethical violations.
- The decision of the panel was arbitrary and capricious and was not supported by the materials provided by the complainant and the charged member.
- The sanctions imposed are inconsistent with or disproportional to the violations found.

After the charged person has received written notification of the Disciplinary Panel's decision, he/she must notify the CB in writing within thirty (30) days by certified mail if he/she wishes to appeal the decision.

If an appeal is not requested, the CB shall issue its decision as the final decision as soon as the appeal period expires (30 days). An appeal may consist only of a letter stating one or more of the acceptable grounds of appeal and the reasons for the appeal. Appeals must be sent to: National Healthcareer Association, Attn: NHA Certification Board (Appeals), 7 Ridgedale Avenue, Suite 203, Cedar Knolls, NJ 07927.

The CB will render a decision regarding the appeal within thirty (30) business days of their receipt of the appeal. The CB decisions are limited to the following:

- Upholding the decision of the CB Disciplinary Panel
- Upholding the decision of the CB Disciplinary Panel, but altering sanctions. These sanctions will be outlined in the letter.
- Reversing the decision of the CB Disciplinary Panel.

Appeal decisions by the CB are final and are not subject to further appellate review.

N. Rescoring (Hand Scoring)

For security reasons, candidates will not be able to review their exam or obtain information on particular test questions. Although it is highly unlikely that a rescoring will result in a change of score, any examinee who feels that there was an error in exam grading and wants his/her exam rescored by hand must submit a written request with reasoning. There will be an additional fee assessed for rescoring. Within 60 days of the examination date, the examinee must send the written request to: National Healthcareer Association, Attn: Processing Dept., 7 Ridgedale Avenue, Suite 203, Cedar Knolls, NJ 07927.

O. Record Retention

The purpose of the NHA Record Retention Policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed or of no value are discarded at the appropriate time. Therefore, each department develops its own records management plan, in cooperation with the Office Manager and the NHA Board. The NHA requires that its records be maintained in a consistent and logical manner and be managed so that the NHA:

1. Meets legal standards for protection, storage and retrieval;
2. Protects the privacy of its members and those associated with the NHA;
3. Optimizes the use of space;
4. Minimizes the cost of record retention; and
5. Destroys outdated records in an appropriate manner.

The NHA Certification Board will maintain a current list of certificants and will provide verification of certification status to the general public. Electronic candidate records are kept on file indefinitely and are not destroyed. In the event an individual's certification has lapsed, the records are still maintained in the database under "inactive" status. Electronically, the CB will indefinitely maintain candidate personal information, scores, type of certificate, expiration dates and recertification information.

The item pool and master exam forms will be stored indefinitely in an electronic format as will be exam development documents such as the JTA Reports, Standard Setting Reports and item analyses. The item pool and master electronic exam forms are stored on password protected NHA servers and is accessible only by the CB Executive Director, director of operations and the director of compliance. The server, which also includes candidate records, is backed up daily and the back up tape is secured in a locked, fire-proof cabinet.

Printed exam forms are stored in the exam distribution department in a locked, fire-proof cabinet. There is very limited personnel access to this area and only the exam coordinator, the coordinators assistant, director of operations and director of compliance and the CB Executive Director are allowed access. Printed exam forms may be reused, but must be shredded after three uses. The printed exam form master, as well as all existing printed exam forms, are shredded upon the creation of a new exam form.

Paper copies of JTA Reports, Standard Setting Reports, item analyses, registration forms, proof of education, work history, answer sheets, sign in sheets and recertification paperwork are maintained at the NHA for one year. After that, they are transferred to Allstate Business Archives, a records storage facility located in Paterson, NJ, where they are maintained for an additional four years before they are destroyed.

P. Security

1. Exam Development Security. The exam development security processes have been previously described in the Exam Development section of these policies. In summary, all items written for its exams are kept in the strictest confidence. To reduce security threats, the participating SMEs/authorized personnel are selected for their integrity and dedication to the CB mission as well as their superior subject matter expertise. SMEs/authorized personnel are limited to those individuals designated by the CB as having a need to know, such as the CB staff, psychometrician, SMEs for item writing/review for standard setting procedures and other individuals authorized by the CB. All SMEs/authorized personnel are required to sign a non-disclosure statement and receive instructions and explanations on multiple areas of Exam Development Security.
2. Exam and Item Storage. As previously described in the Record Retention policy, the item pool and master electronic exam forms are stored on password protected NHA servers. The server, which also includes candidate records, is backed up daily and the back up tape is secured in a locked, fire-proof cabinet. Printed exam forms are stored in the exam distribution department in a locked, fire-proof cabinet with access by only the exam coordinator, the coordinators assistant, director of operations and director of compliance. The printed exam form master, as well as all existing printed exam forms, are shredded upon the creation of a new exam form. Any confidential printed materials used at meetings by the SMEs are shredded after the meeting.
3. Exam Administration Security. All proctors of the NHA must be pre-approved must sign the “NHA Proctor Oath”. For approval, the testing site must submit a letter requesting the approval of the proctor, along with a copy of the individual’s resume and signed oath. An NHA proctor is expected to adhere to the rules and regulations set forth in the “NHA Proctor Oath”. This oath is given to the individual along with a letter of explanation of the severity of the oath, and it is required to be signed and filed in our corporate office before final approval can be given. The oath attends to securing exam materials before and after the exam, standardized instructions for examinees, seating, observing examinees, cheating, exam checklists and return of exam materials to the NHA. All exam materials sent to or by the proctor are sent via a traceable method, with a signature required for receipt.