

A Review of the Newly Adopted *NCCA Standards*

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The opinions expressed within are those of the author and do not reflect the views of the National Commission for Certifying Agencies or the Institute for Credentialing Excellence.

On November 26, 2014, the latest revision of the *Standards for the Accreditation of Certification Programs* was adopted by the National Commission for Certifying Agencies (NCCA). Although the *NCCA Standards* were designed for certification programs, they are relevant to licensure programs as well. This article will provide a high-level overview of the *NCCA Standards*, explain the relevancy of the *NCCA Standards* for licensure programs, describe the *NCCA Standards* revision process, and identify some of the changes in this revision of the *NCCA Standards*.

Overview

The purpose of the *NCCA Standards* is to delineate the attributes of a quality certification program. The *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” (p. 1). The major themes of the *NCCA Standards* are resources, autonomy, conflicts of interest, representativeness, transparency, accountability, confidentiality, security, psychometric soundness, quality assurance, and maintenance of currency with practice. All of these are issues that licensure and certification share.

The NCCA uses the *NCCA Standards* to evaluate certification programs that apply for NCCA accreditation. It is important to note that the NCCA accredits certification programs (e.g., Certified Medical Assistant) not certification organizations (e.g., American Association of Medical Assistants) or certification examinations (e.g., National Registry of EMTs Paramedic Certification Cognitive Examination). Currently, over 300 programs have been accredited by NCCA.

The *NCCA Standards* are organized as a collection of standards each of which has a description, one or more essential elements, and commentary intended to communicate expectations and help programs interpret the standard. When used for accreditation purposes, the *NCCA Standards* are minimum standards, meaning that certification programs must meet each and every standard and its essential elements to be granted accreditation. Programs cannot waive or otherwise opt out of compliance with any of the standards. In this regard, they are quite different than the aspirational Standards for Educational and Psychological Testing (American Educational Research Association, American Psychological Association, & National Council on Measurement in Education, 2014), which explicitly state, “Evaluating the acceptability of a test or test application does not rest on the literal satisfaction of every standard in this document” (p. 7).

Relevance of the *NCCA Standards* to Licensure

Although NCCA accreditation is voluntary, some regulatory bodies require practitioners of specific professions to have their skills certified by an accredited certification program. For example, OSHA regulation 29 CFR 1926 Subpart CC, released August 9, 2010, requires crane operators involved in construction to be certified by an accredited certification provider. Similarly, California CCR, Title 9, Section 13035(c) requires addiction counselors to be certified by an NCCA accredited certification program. The Advanced Practice RN (APRN) Consensus Model (2008) that was developed by the vast majority of nursing credentialing programs for the purpose of assisting state boards of nursing with the licensure, accreditation, certification, and education of APRNs, requires all APRN certification programs to be accredited by the Accreditation Board for Specialty Nurse Certification (formerly the American Board of Nursing Specialties) or the NCCA. This model, which impacts over 250,000 APRN practitioners, has been adopted by many states and is continuing to grow in its scope and reach. Although much of this legislation allows certification programs to choose their accreditation, the NCCA accreditation is arguably the most popular accreditation available. These examples demonstrate that application of the *NCCA Standards* has extended to the practice of regulation and further justifies their applicability to licensure.

The *NCCA Standards* Revision Process

The initial version of the *NCCA Standards*, which was then called the *Standards for Accreditation of National Certification Organizations*, was developed and adopted by section between 1977 and 1982. The initial version contained 46 statements that were arranged into nine general topics. Although the content did not change, the name of the *NCCA Standards* changed to the current name in 1987 as a result of the complete reorganization of the corporate structure. The *NCCA Standards* began its first revision process in 1999. This revision changed the structure to contain stated standards, required essential elements, and explanatory commentary, identical to the structure still in use today. This revision was officially adopted in 2001 and made effective in 2002. A minor content revision occurred in 2004 which clarified the requirements of the public member and the standard pertaining to test administration.

The most recent revision to the *NCCA Standards* began in 2013 with a call for volunteers. During the 18-month effort, a steering committee and three task forces comprised of over 50 volunteer certification industry leaders met regularly to draft and revise the *NCCA Standards*. The proposed *NCCA Standards* were submitted for public comment on September 6, 2014. Based on public comment, the *NCCA Standards* were modified slightly and presented for vote on October 24, 2014 to the 131 agencies with accredited programs. Of the 87 agencies that submitted a vote, 86% were in favor of adopting the new *NCCA Standards*, which were officially approved on November 26, 2014.

The new revision of the *NCCA Standards* goes into effect January 1, 2016. All NCCA accredited certification programs will be expected to comply with the new revision of the *NCCA Standards* at that time. New and renewing applicants will demonstrate compliance by completing the new version of the NCCA application, which should be released later this year. Programs that were accredited by NCCA before 2016 will not be required to submit any additional evidence of their compliance beyond the information provided each year to NCCA as part of their annual report.

The preamble of the *NCCA Standards* states that the revision process was guided by a few principles which include relevancy, currency, consistency, and distinctiveness. In addition, special attention was made during the revision process to involve individuals employed by corporate certification programs (e.g., Microsoft Certification Program) and to address the relevancy of the *NCCA Standards* for corporate certification programs. Corporate certification programs are different than more traditional certification programs because they are offered by an organization whose primary purpose is generally not certification, regulation, and/or licensure. Often times, the purpose of these programs is to assist hiring managers rather than protect the public. Corporate certification programs are also different from employment testing programs for several reasons, the most salient of which is that a credential is granted which has value to employers other than the corporation offering the certification program.

The 2013-2014 revision process used the verbiage of the existing *NCCA Standards* as a starting point. In other words, a zero-order revision was not pursued. However, the Steering Committee evaluated alternative ways in which to convey each of the standards. Ultimately, the Committee decided to maintain the current format, which provides a description of the standard, its corresponding essential elements and supplemental commentary.

Technology has changed greatly since the last revision of the *NCCA Standards* was adopted in 2004. At that time, certification programs submitted their applications to NCCA in paper format or electronically via a CD-ROM. Each application contained hundreds, if not thousands, of pages of documentation assembled into what became known as an NCCA application binder. In 2013, NCCA began requiring programs to submit their application for accreditation online through a website which requires applicants to address each essential element of the *NCCA Standards* separately by providing a narrative response and relevant supporting documentation.

It is logical to conclude that the change in submission format encouraged the NCCA, the NCCA Standards Revision Steering Committee and certification programs to think about the *NCCA Standards* more analytically. This may explain why, despite only a small increase in the number of standards, the number of essential elements in the latest revision of the *NCCA Standards* contains 87 essential elements, an increase of 40 from the prior revision, which contained 47. Given this increase, some may project that NCCA applications will take more time to complete. On the other hand, the essential elements of this revision are intended to more clearly and logically delineate the components of a certification program. As a result, some programs may actually save time completing their application.

Changes to the 2016 *NCCA Standards*

From a big picture perspective, there were not any major changes to the latest revision of the *NCCA Standards*. The focus of the revision effort was to clarify the wording and expectations of some standards and to expand the applicability of the *NCCA Standards* to the growing number of complex certification programs that require candidates to pass more than one certification examination to be credentialed. In addition, effort was made to update the *NCCA Standards* to reflect changes in the practice of test security. Along the way, an additional standard was born which covers error handling and quality control (Standard 23).

This revision of the *NCCA Standards* maintains the level of quality expected by accredited programs. In other words, certification programs are not being asked, for example, to make their programs more autonomous or their certification examinations more reliable. However, some standards were added or

expanded which will require certification programs to provide additional information to demonstrate their compliance. For example, Standard 16 Essential Element A requires programs to submit an item development plan, something that was not required under the previous revision of the *NCCA Standards*.

Although these additions will require certification programs to submit more information, accredited programs should already have the required policies and procedures in place. Therefore, these additions should require nothing more of applicants than submitting additional documentation along with their application. Nonetheless, some programs may find it necessary to spend additional time documenting their activities, policies, and procedures.

The *NCCA Standards* now contain 24 standards. There are five standards which pertain to purpose, governance, and resources, nine standards which outline policies and procedures, nine standards that apply to assessment instruments, and one standard which pertains to the maintenance of accreditation.

One small but important change was to the first standard, which now clearly excludes programs that only certify the competency of individuals to practice a skill. Although skill is not explicitly defined by NCCA, one can infer that a skill is a learned ability to carry out a task. Tasks are much smaller in their scope than a job role or occupation, and, generally speaking, individuals who possess a skill may use that skill in a wide variety of job roles. In essence, skills are the building blocks of a job role, profession, occupation, or specialty area. Although the assessment of a skill can be complex, it is out of the scope of the *NCCA Standards*.

In the governance section, small modifications were made to the documentation pertaining to the involvement of public members and relevant stakeholders. In addition to having a voting public member on the certification board, programs must now document how the public interest is “routinely represented and protected” (Standard 2: p. 4). In addition, programs must “identify their stakeholders and provide an ongoing mechanism to solicit their input” (Standard 2: p. 4). It could be argued that the new *NCCA Standards* require more involvement rather than simply more documentation. Either way, this modification is a win for protecting the interests of external stakeholders.

The text explaining the relationship between the training and certification functions of a certification organization was clarified by delineating it as a new standard entitled, “Education, Training and Certification” (Standard 3: p. 6). Although the wording has changed from the previous revision of the *NCCA Standards*, the intent of this standard is largely the same: to maintain an appropriate firewall between organizational functions. Specifically, the first part of this standard requires programs to maintain impartiality between the education and certification divisions of a certification organization. The second aspect provides a much-needed list of dos and don’ts for organizations that offer and require education/training of individuals pursuing certification. This list provides much-needed clarity to what has been a confusing standard for some time.

In turning to resources, the *NCCA Standards* now explicitly enable certification programs to be financially supported by another entity as long as there is a formal, written agreement in place obligating the sponsoring organization to support the certification program. With respect to human resources, the *NCCA Standards* now require programs to provide evidence of appropriate oversight and monitoring of personnel performing certification activities. This is an important modification from an accountability perspective. Programs can no longer defer responsibility for the actions taken by a testing

vendor. If a program does not have qualified resources in-house by which to monitor its testing vendors, it may behoove the program to periodically have the services reviewed or audited by a third party.

The standards that pertain to a program's policies and procedures were also reorganized and clarified. Evidence of a policy and procedure describing the retesting of failing candidates is now required (Standards 6, 7). Programs should already have this policy in place, although some may need to add this documentation to their candidate handbook or equivalent. In addition, the *NCCA Standards* now prohibit a program from unreasonably limiting access to certification (Standard 7). This standard will prevent programs from requiring certificants to pay expensive fees (e.g., membership fees) that support organizational activities separate from certification and recertification.

Some of the essential elements of the policies and procedures section now require programs to provide their rationale for the policies and procedures. Although it is beyond the scope and capacity of NCCA to thoroughly evaluate the rationale provided by a program, these additions will help prevent organizations from capriciously impacting their candidates.

The wording and intent of the essential element relating to the use and acceptance of alternative certification examinations was changed. Programs must now demonstrate the content and empirical equivalence of another certification examination to accept it as an equivalent. Demonstrating content and empirical equivalence requires quantitative data from both examinations, which realistically limits the use of alternative examinations to certification programs that are collaborating with the organization sponsoring the alternative. Stated another way, this standard prevents a certification program from "kidnapping" the certificants of another program.

Two new standards were created about confidentiality (Standard 10) and conflicts of interest (Standard 11), which clearly document that which was implied by the previous *NCCA Standards*. Since confidentiality is of utmost importance to all testing organizations, the requirements of this standard serve to guide the way in which programs document their confidentiality procedures. The standard about conflicts of interest requires programs to have all relevant individuals sign conflict of interest statements, a step which some organizations may not have taken with all relevant personnel in the past.

The changes to the psychometric standards were more substantive. A new standard was created regarding the composition of subject matter expert panels (e.g., standard setting panel). This standard (Standard 13) requires programs to have panels that are inclusive and representative, which was only implied in the prior verbiage. Since the procedures needed to obtain representativeness will vary from profession to profession, programs should seek the input of an experienced psychometrician prior to assembling panels of subject matter experts.

The job analysis and standard setting standards (Standards 14 and 17) do a much better job of outlining the information that must be contained in the research report documenting the outcomes of any studies. Also, these standards contain an additional essential element which requires programs to conduct these activities frequently enough to maintain the currency of the program.

A new standard was created about examination specifications (Standard 15). This standard requires programs to provide more detail in their specifications than has been required previously. This includes the objective of the exam, the trait being measured (e.g., cognitive or psychomotor), the distribution of content, the types of items that are to be used, the item and examination refresh design, and the

psychometric specifications such as the total number of test items, total administration time, and number of test forms.

The verbiage concerning test administration was transformed into its own standard (Standard 18) and more accurately reflects the objectives of a successful test administration. Stated in layperson terms, programs must ensure that test administration is fair, confidential, and secure. Those interested in remote proctoring will find that the test administration standard neither permits nor prohibits this strategy. Rather, it identifies the aspects of a successful test administration. Although this is encouraging news for remote proctoring advocates, there is still a lack of third party research suggesting that remote proctoring is equivalent to or more secure than the face-to-face proctoring methods in use today. As a result, despite the new verbiage, programs using remote proctoring may still find it challenging to become accredited.

The scoring, reliability, and equivalency standards (Standards 19, 20 and 21, respectively) were reworded for clarity. In addition, an essential element was added to the scoring standard which requires programs to provide additional performance information to failing candidates, and the reliability standard now requires conjunctively (i.e., multiple-hurdle) scored examinations to have sufficient reliability in each of the independently scored sections. The equivalency standard now makes it explicit that programs must use empirical procedures to equate forms. The commentary indicates, "The use of standard-setting procedures in place of equating procedures is generally unacceptable" (Standard 21: p. 26). This is a marked change from the previous revision and may impact some programs.

A new standard was adopted which pertains to quality control and error handling (Standard 23). This standard requires programs to monitor activities and to take appropriate action when irregularities or program errors occur. From a test taker's perspective, this may be the most significant change to the new revision of the *NCCA Standards* and should be welcome by the public as a way of providing some assurance that programs are not turning a blind eye to the unfortunate technical errors that sometimes occur. Unfortunately for the public, this standard does not go far enough to ensure that test results will be corrected if an organization discovers an error.

Similar to the modifications made to other standards, the recertification standard (Standard 22) will require programs to provide additional documentation. Programs will need to document their rationale for the recertification requirements, as well as their process for verifying that certificants have met the recertification requirements.

The maintenance of certification standard (Standard 24) added an essential element which allows NCCA to conduct a program audit. The commentary indicates that this audit may be onsite, virtual, or through a third party. This new element will discourage programs from providing false information, thereby enhancing the quality and credibility of the NCCA accreditation. This also increases the value and motivation for individuals to file a complaint against a program with NCCA. Although NCCA is not likely to audit every program in which a complaint is filed, it is likely that NCCA will exercise its right to audit during 2016 and beyond.

Although the new *NCCA Standards* are longer and require programs to submit more documentation, they do not increase the level of quality required by certification programs. Nonetheless, the additional detail may reveal weaknesses in some programs, which may find it necessary to modify their policies

and procedures in order to maintain their compliance with the *NCCA Standards*. Programs are advised to read the *NCCA Standards* carefully and to ask questions when they arise.

In reflecting on the changes as a whole, the *NCCA Standards* are more objective, which will make them easier for the certification programs and the NCCA to understand, implement, and enforce. The new *NCCA Standards* contain some new clauses, such as those in the governance and error-handling standards, which support the interests of test takers and the public while others, such as those in the financial resources and use of alternative certification examinations, better protect the interests of the certification program. It will be interesting to see if the addition of the clause permitting NCCA to audit a program will increase the attractiveness of the *NCCA Standards* to legislators and regulatory bodies. Although the length of the new *NCCA Standards* may intimidate some, it is likely that most will find plenty of changes to their liking.

References

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