

**Interstate Renewable Energy Council
IREC DRAFT Standard 14732: 2012
General Requirements for Renewable Energy
& Energy Efficiency Certificate Programs**

***Public Comments as of 12/7/2011 and
IREC Standards Committee Responses***

LEGEND

Text of draft Standard

Public comment text

IREC Standards Committee response to comment

Edits made to Standard as a result of public comments

**Interstate Renewable Energy Council
IREC DRAFT Standard 14732: 2012
General Requirements for Renewable Energy & Energy Efficiency Certificate Programs**

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1. Scope

1.1 This standard forms the foundation for the accreditation of certificate-awarding entities developing and administering credit or non-credit energy efficiency and renewable energy-related programs offered in formal educational institutions and other legal entities. For the purposes of this standard, energy efficiency is defined as the goal of efforts to reduce the amount of energy consumed to produce a service, product, or condition. Renewable energy constitutes wind, solar, geothermal, biopower, hydrogen, non-conventional hydro, and renewable fuels.

1.2 This standard provides the accreditation requirements **that** energy efficiency and renewable energy-related programs must meet and document in order to earn and maintain accreditation. The purpose of accreditation is to determine if the program meets the requirements for issuance of a market-valued certificate.

1.3 This standard does not address requirements for the certification of individual practitioners, educators, or trainers in energy efficiency and renewable energy-related programs.

Add the work THAT to provides the accreditation requirements THAT energy efficiency Also add the work RECOGNIZED to issuance of a recognized market-valued certificate. This recognition is why any organization would want an IREC Certification in the first place.

“That” was added to the sentence as suggested. “Recognized” was not added as the Committee did not feel it added any further clarification to “market-valued.”

We have no concerns, just a question: Is this a program PV Installation and Solar Thermal Installation training organizations can apply for?

The certificate does not have a name. You may want to suggest possible names.

Both of these comments are addressed in the current content of the Standard.

2. Referenced Documents

2.1 NREL 2009 Renewable Energy Databook Gelman, R. (2010). 2009 Renewable Energy Data Book, August 2010 (Book). 132 pp.; NREL Report No. BK-6A2-48178; DOE/GO-102010-3074. <http://bpi.pnl.gov/forum>

2.2 ISPQ Standard 01022, Accreditation and Certification of Renewable Energy, Energy Efficiency and Distributed Generation Training Providers

2.3 ANSI/ASTM E 2659-09 Standard Practice for Certificate Programs

2.4 ANSI/ISO/IEC 17024:2003 Conformity Assessment—General Responsibilities for Bodies Operating Certification of Personnel

2.5 ANSI/ISE/IEC 17011:2004(E) Conformity Assessment—General Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies

2.6 ANSI/IACET 1-2007 Standard for Continuing Education and Training

Like you did in the first example <http://bpi.pnl.gov/forum> indicate where I can find these references. They may not be a click away but even if they can be found in a later appendix please tell me here how to contact that Nationally Recognized Authority or Consensus body. And even if the format does not call for it please tell me the year of publication for each of these references. Many change every couple of years yet your standard is likely to last for a long long time.

The Committee recommends that full citations as listed be used rather than URLs, since URLs are not permanent.

Glossary of Terms

This Glossary of Terms is provided solely for the purposes of this Standard. The terminology provided is to guide applicant organizations. Several sources were referenced including Professional Testing, Inc. website, www.proftesting.com, ASTM E2659-09 *Standard Practice for Certificate Programs*, and ISO/IEC 17024 *Conformity Assessment—General Requirements for Bodies Operating Certification of Persons*.

Accepted Testing Practices—Practices that experts who develop, maintain, and administer examinations follow to assure reliability and validity of assessment instruments. There are several published standards addressing accepted testing practices including:

- International Standard ISO/IEC 17024 *Conformity Assessment—General Requirements for Bodies Operating Certification of Persons* (accreditation standards) administered by the American National Standards Institute (ANSI);
- *Principles of Fairness: An Examination Guide for Credentialing Boards* (Council on Licensure, Enforcement and Regulation and National Commission for Certifying Agencies, revised 2002);
- *Standards for Education and Psychological Testing* (1999) published by the American Educational Research Association, the American Psychological Association and the National Council on Measurement in Education;
- *Uniform Guidelines of Employee Selection* (1978), adopted by the United States Equal Employment Opportunity Commission, Department of Labor and Department of Justice.

Accreditation—Third-party review and attestation of an entity's conformance with an established standard. Accreditation is awarded for a fixed period of time and requires renewal.

Certificate—A document awarded to individuals meeting and successfully completing the certificate program's requirements.

Certificate-Awarding Entity—A legal entity that offers education/training culminating in the award of a market-value certificate.

Certificate Invalidation—Certificates issued may be invalidated should the individual fail to comply with certificate program terms and conditions.

Certificate Program—A ~~course, sequence pattern, or group~~ course, sequence of courses, or learning events focusing on an area of specialized knowledge or information with specific learning objectives. The certificate program is developed, supervised, and evaluated by subject matter experts and culminates in the issuance of a document indicating fulfillment of specific completion requirements.

Certificate Program Personnel—Individuals employed, contracted or volunteering to administer any component of the certificate program, including instructional design and delivery; assessment development and administration; student registration; program delivery support and administration, and other key program related activities and services.

Criterion-Referenced—An assessment scoring methodology that measures an individual's performance against predetermined competency standards that have been validated by subject-matter experts, instead of against the performance of others. Each assessment must be validated against the competency standards it is assessing.

Document Control—The procedures established in developing, approving, revising, naming, storing, accessing, and disposing of program documents (policies, procedures, records).

Education/Training Cycle—Series of steps or stages that comprise a complete education/training program from admission to issuance of the certificate.

Generally Accepted—Procedures, processes, or practices that have been agreed upon and validated by experts in a discipline, and are referenced consistently in professional literature.

FERPA (Family Educational Rights and Privacy Act of 1974)—Federal legislation in the United States that protects the privacy of students' personally identifiable information (PII). The act applies to all educational institutions that receive federal funds. It states that parents of students under 18, or eligible students (students over 18, or those who have matriculated to an educational institution above high school) be allowed to view and propose amendments to their educational records. The act also mandates that schools must obtain written permission from parents or eligible students in order to release a student's PII.

Internal audit—Refers to a first-party review (internal self-assessment) of an entity's policies and procedures and the entity's conformance with such; frequently a component of a documented management system. Findings from internal audits include preventive and corrective actions for areas of non-conformance, as well as opportunities for continuous quality improvement.

Job Task Analysis—An industry accepted study by a group of experts that defines competencies in knowledge, skills, and attitudes that establish the basis for education/training curricula. Similar activities are also referred to as task analyses, practice analyses, and role delineation studies.

- a. Tasks are the individual functions, whether mental or physical, necessary to carry out an aspect of a specific job.

b. Knowledge, skills, and attitudes (KSAs) include the information and other attitudes that the practitioner must possess in order to perform a job competently, ethically, and safely.

Learner—A participant in a learning event who acquires knowledge or skills directly or indirectly through the facilitation of a subject matter expert.

Licensure—(for information only) A requirement sponsored by a governmental agency and typically requiring an exam for the purpose of protecting public health, safety, and welfare. Licensure exams are criterion-referenced tests which individuals are legally required to pass before they may be employed in the occupation or use a particular occupational title.

Management Review—Program management’s study of internal audit and program evaluation results followed by implementation of any corrective or preventive actions.

Management System—The combination and integration of policies, procedures, and processes by which the certificate program is developed, implemented, maintained, and evaluated.

Passing Score—Also known as the cut-off score, the passing score separates those who have successfully achieved the learning objectives from those who have not. It refers to the criterion-referenced minimum score a learner must achieve in order to pass a test or assessment.

Personnel—(see Certificate Program Personnel)

Prerequisites—Previously learned knowledge, skills, and attitudes that the learner must have *acquired* before new learning can occur; prerequisites can take the form of individual knowledge and skills, skill sets, and lessons, units of instruction, and/or courses that have specific learning objectives. These differ from entry requirements which are a list of abilities and accomplishments that an individual must have before he/she can take a course. Entry requirements usually take the form of abilities (e.g., math, language, or kinesthetic aptitudes), work experience (e.g., 2-3 years working as a solar installer apprentice), and/or education (e.g., a high school diploma).

Stakeholders—Any individual or group with a primary interest in, or who may be significantly affected by, the certificate program.

Summative Evaluation—A technique used at the end of a program to collect evidence (a) about the value of an instructional program or (b) to determine whether students in the program have mastered the stated learning objectives. Summative evaluation is intended to “prove” the effectiveness of a program or the competence of the students by “summing up” the results after the program has been completed.

Systematic Program Plan—A documented process to create or revise educational programs, workshops, or courses (i.e., instructional systems **design/development**) using the interrelated components of analysis, design, development, implementation, assessment, and evaluation.

Tangible Products—Any concrete or physical object that has multiple critical elements that must be evaluated for compliance to a standard or criterion. Examples include schematics, blueprints, diagrams, reports, architectural models, renderings, essay items on an assessment.

Valid Certificate—The length of time for which the certificate is considered current, based on the duration of program content relevance.

Simple correction to use a page break before the title GLOSSARY so that this shows up on the top of the next page over the actual glossary.

Comment accepted.

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3. General Requirements

Community colleges are not going to be able to afford to apply for these certificates. We provide training to a very underserved population in most cases. We are stretched to provide programming. To apply for these certificates would require monies we do not have and manpower we do not have.

This was not interpreted as a suggested change to the language of this Standard, but the Committee did comment that community colleges fund accreditation in many other subject areas. This is a voluntary accreditation and will be pursued at the discretion of individual institutions.

3.1 Eligibility for Accreditation: The certificate-awarding entity shall demonstrate that it has conducted the education/training program in its entirety, at least once, at the time the accreditation application is submitted.

I encourage strengthening the 3.1 Eligibility for Accreditation requirements in order to promote and distinguish top quality training programs from start-ups.

Recommendation that certificate-awarding entity must demonstrate that it has satisfactorily conducted the education/training program in its entirety at least once at the time of accreditation application submission in accordance with industry-recognized principles and best practices, including, but not limited to alignment of training program with industry-accepted goals and outcomes related to knowledge, skills, and abilities.

The intent of this section is to outline basic requirements. The requirements are expanded upon throughout the Standard.

3.2 Legal Entity: The certificate-awarding entity is a legal entity or is part of a legal entity.

Does legal entity directly require Incorporated status? I assume so but it's not clear what the term means here and for compliance purposes applicants may claim that they are not engaged in _illegal_ practises, therefore they are a _legal_ entity, or that only a law firm may apply...etc. With at least 50 jurisdictions interpreting this clause I would rephrase it to make this more specific.

It was the consensus of the Committee that the wording of this requirement is sufficiently clear as written.

3.3 Organizational Structure: The certificate-awarding entity shall ~~have an possess the required~~ organizational infrastructure ~~that to~~ ensures confidence on the part of learners and other stakeholders. Certificates shall be issued by an entity that has a designated manager charged with administrative oversight to ensure the certificate program conforms with all policies, procedures, and administrative processes.

Sentence starting 'The certificate-awarding entity shall possess...' is unnecessarily vague and then specified in the second sentence. The first sentence should be struck.

Recommendation that the certificate-awarding entity be issued by designated manager charged with administrative oversight and demonstrated relationship with other industry stakeholders including employers, industry associations, and workforce development practitioners to ensure certificate holds value to both workforce and employer and further ensures portability, recognition of industry-accepted standards and competencies, and stackability in a career pathway framework.

The Committee adjusted wording in this section to be more precise. It was the consensus of the Committee that the first sentence and second sentence relate different concepts, so both were kept.

3.4 Policies and Procedures: The certificate-awarding entity shall have policies and procedures guiding decisions related to the administration of the systematic program plan and the management system.

Vague and imprecise. Strike this clause or make it much more specific.

The consensus of the Committee is that this requirement is specific as currently written. There will be additional guidance in the Program application.

3.5 Stakeholder Participation: The certificate-awarding entity shall provide interested and relevant parties affected by the workforce outcomes of the program with opportunities to participate in program development and continuous quality improvement initiatives in a manner that maintains balance of stakeholders and transparency of process. ~~No one interest shall predominate.~~

Ibid. The last sentence in particular is vague - I think that the authors meant something like 'changes under vote shall be voted on transparently and no one stakeholder class shall have more than 30 % of total eligible voting rights.'

Balance and transparency are important concepts to include. “No one interest shall predominate” was struck to address this comment.

Recommendation that this section include language defining examples of, but not limiting definition of, stakeholders such as employers, workforce development practitioners, students/trainees, training professionals, industry associations, community-based training providers, community college system, etc.

It was the consensus of the Committee that is not the Standard's role to define "stakeholders." This should be defined by individual applicants.

3.6 Linkage with Industry: The certificate-awarding entity shall maintain relationships with the subject industry as a means to ensure the continued market value and currency of the certificate.

Speaking as an industry association I find this clause unduly and unhelpfully vague; this standard seems written by and for already-licensed educational institutions.

Recommendation to provide examples of industry stakeholders such as employers, workforce development practitioners, students/trainees, training professionals, industry associations, community-based training providers, community college system, etc.

It was the consensus of the Committee that providing examples would be too prescriptive. This should be defined by the applicant.

3.7 Staff Size: The certificate-awarding entity shall ~~have demonstrate it has~~ sufficient personnel to meet program obligations and functions.

Vague - already covered by requiring a dedicated program manager. If response time is the issue, then demonstrated response time should be specifically required - 1 business day to acknowledge correspondence, 3 to respond would be a reasonable requirement I believe.

It is not clear how 3.7 on pg 10 and 5.1.1. on pg 12 differ. Both refer to sufficient personnel. Apparently 3.7 refers to staff and 5.1.1 refers to faculty, but this is not clear. The word "sufficient" is also vague. Could this be quantified as a student-to-staff ratio?

The statement is made "sufficient personnel". You need to define sufficient. At least in terms of topics.

The Committee elected to quantify 'sufficient' with 'demonstrate', putting the onus on the applicant to show that the personnel are sufficient.

3.8 Commitment to Quality: The certificate-awarding entity shall have a written process for ~~continuous quality~~ improvement of ~~program implementation and management~~. Top

management shall ensure that this policy is understood and implemented at all levels of the organization.

Writing the process or policy down has little to do with understanding and implementation. Seems a way to create a slowdown here. I believe that this is redundant given the requirement for policy and procedure in Section 4.

Recommendation to include language stating that certificate-awarding entity will ensure annual review of statement of commitment to quality; benchmark against outcomes; and demonstrate integration of evaluative recommendations as continuous improvement to training program.

The Committee changed wording in this section to clarify precisely what is being continuously improved.

4. Requirements for Policies and Procedures

4.1. Written Policies and Procedures: At a minimum, there shall be written policies and procedures to address the following. **Policies must comply with applicable regulations or statutory requirements.**

This list is far too long for us at a (small, renewable energy) national association - I understand that may be intentional to separate the wheat from the chaff.

The Committee feels that an important role of the Standard is to both require that organizations document their existing policies and procedures, as well as to ensure that they have all necessary policies and procedures in practice. The Committee's consensus was to leave in all policy and procedure requirements.

- 1. Certificates:** The certificate-awarding entity must have written policies and procedures providing for granting and use of certificates and invalidation of certificates. Certificate invalidation shall occur only if it is found that the certificate holder has not fulfilled the certificate program requirements.

12.1 Certificates must include the names of the certificate issuer and holder, the title and scope of the certificate program, the date issued, a unique certificate number, date of expiration, if applicable, and the designation obtained if applicable. The certificate must be signed or validated by an authorized official.

12.2 The certificate-awarding entity shall define the correct references to and authorized uses of the certificate and communicate those to certificate holders and other stakeholders.

Recommendation that any certificate with expiration or requiring renewal includes the date or timeframe of expiration or mandated renewal.

Expiration is addressed in the current language of the Standard. Renewal is not typically used in reference to certificate programs so will not be addressed.

2. *Complaints and Appeals:* The certificate-awarding entity shall have defined policies and procedures for filing, handling, and resolving complaints and appeals. **Due process shall be assured.** These policies and procedures shall be published and accessible to the public. ~~Policies and procedures must include due process for learners.~~

Recommendation to include language with regards to certificate-awarding entities to ensure that the appeal process include other industry stakeholders in the review process of the appeals procedure and decision, for example an industry advisory committee of employers and training professionals. (Committee) means those persons designated by the sponsor to administer the program. A committee may be either joint or non-joint, such as (1) a joint committee that is composed of an equal number of representatives of the employer(s) and of the employees represented by a bona fide collective bargaining agent(s) or (2) a non-joint committee, which may also be known as a unilateral or group non-joint (which may include employees) committee, has employer representatives but does not have a bona fide collective bargaining agent as a participant as an example.

It is not the role of the Standard to prescribe the appeals process to this level of detail.

Notwithstanding the introduction to this document, it is not totally clear to me whether this clause applies to training only or also to the certification of individuals. I would add 'related to training' to the end of the first sentence, if this is what's intended.

In the clause regarding due process “for learners” was struck, to be more inclusive of other stakeholders.

- 3. *Conflict of Interest:*** The certificate-awarding entity must have clear and documented policies and procedures to ensure conflicts of interest concerning the certificate program are minimized and managed, or avoided if possible. Such policies and procedures shall apply to all certificate program personnel.
- 4. *Confidentiality:*** Except as required in this Standard, or by regulations and statutory requirements, the certificate-awarding entity must have written policies and procedures providing for the confidentiality of information obtained in the course of education/training activities. Information that must be kept confidential includes, but is not limited to, any personally identifiable information of learners and/or applicants.

I believe that this legal requirement should follow local law and specifically mention so. Something along the lines of 'The entity must comply with all local confidentiality laws and also...' As written it is open-ended and vague.

This is addressed in the Standard as currently written.

5. *Non-Discrimination:* The certificate-awarding entity shall assure its practices do not discriminate in admitting candidates, educating/training learners, providing access to resources, and hiring personnel. ~~Policies must comply with applicable regulations or statutory requirements.~~

Recommendation that in addition to proposed language inclusion of language promoting proactive efforts for diversity and inclusion in order to ensure that the sector does not inadvertently continue gender segregation.

The Committee considers this to be too prescriptive to be accepted as addition to the requirements for the Standard.

6. ~~Paid Advertising~~*Paid Promotions:* ~~Advertising Promotion and sponsorship acknowledgement are restricted under this standard and are is prohibited within the delivery of educational content. including, but not limited to, banner ads, subliminal ads, pop up window ads, or links to promotion of products and/or services. Sponsorship acknowledgement is allowed.~~ Policies and procedures must address conflict of interest and undue influence.
7. *Release of Information:* The certificate-awarding entity must have written policies and procedures providing for the release of information gained in the course of education/training activities about an applicant or learner only with the written consent of the subject person, unless otherwise required by applicable law.
8. *Record-Keeping and Documentation Systems:* The certificate-awarding entity shall maintain a comprehensive record-keeping and documentation system that includes types of records maintained, access to records, storage timeframes, and records disposition. At a minimum, the record-keeping and documentation system shall include the following:
 1. systematic program plan
 2. relationship to relevant industry
 3. stakeholder participation
 4. program evaluation reports
 5. student records

6. complaints and appeals
7. personnel records
8. internal audit
9. confidentiality and privacy
10. financial records
11. certificates issued.

Point one is unclear and should be better defined. Point two is completely baffling to me, i.e. what would satisfy this requirement?

The only other comment I wanted to make was the record keeping related to Certificates. In many institutions that I work for (Community Colleges) they do not enroll non-credit students into their "official" computer system as students. Certificate records are not accessible the same way that a transcript may be requested. At worst the paper records are destroyed after a relatively short period of time. Since "Student Certifications" are not time limited in this industry the granting institutions need to maintain records past the expected lifetimes of their students and that means electronically.

The committee has elected to leave the requirement as written.

- 9. Safety and Safe Practices:** The certificate-awarding entity must have and maintain policies and procedures that ensure ongoing safety and safe practices in the delivery of the certificate program ~~and encourage proper and safe industry practices.~~
- 10. Undue Influence:** Where any form of outside financial support is provided to the certificate-awarding entity, there shall be documentation ensuring no undue influence on the program has occurred as a result of such financial support.

I find this too vague to be meaningful.

The Committee elected to leave this requirement as written. It is not the intent of the Standard to be more prescriptive.

5. Requirements for Personnel

5.1 Program Personnel: The certificate-awarding entity is responsible for and has authority over personnel matters related to the certificate program. Personnel shall include employees, volunteers, and contractors.

5.1.1 The certificate-awarding entity shall ~~have~~ demonstrate it has sufficient and qualified personnel to perform the functions required by the certificate program.

I believe that 5.1.1. is vague and unhelpful and should be struck in favour of 'at least one dedicated employee', as above.

It is not clear how 3.7 on pg 10 and 5.1.1. on pg 12 differ. Both refer to sufficient personnel. Apparently 3.7 refers to staff and 5.1.1 refers to faculty, but this is not clear. The word "sufficient" is also vague. Could this be quantified as a student-to-staff ratio?

The statement is made "sufficient personnel". You need to define sufficient. At least in terms of topics.

The Committee quantified 'sufficient' with 'demonstrate.' The onus will be on the applicant to show that the personnel are sufficient.

5.2 Qualifications of Certificate Program Personnel: The certificate-awarding entity shall **define and document** ~~assure that program personnel have~~ the necessary education, training, certification, and/or experience **for personnel who** design, develop, and/or implement the program. ~~The certificate-awarding entity must define and document competency requirements, qualifications and experience required for all certificate program personnel who design, deliver, and/or implement the curriculum. Competency requirements must be reviewed at least annually with subject matter experts to ensure that the requirements are current. Qualifications requirements must be reviewed at least annually.~~

While I understand the intention of this clause, the outcome is potentially onerous. What is necessary education, training, certification and/or experience, and according to whom? Vague.

Recommendation to add language stating that all training professionals/instructors maintain updated current industry-recognized credentials as defined by the certificate-awarding entity.

Language in the Standard was clarified to address these comments.

5.3 Responsibilities of Personnel: At a minimum, the certificate-awarding entity shall identify personnel responsible for the following key program activities:

1. Formulating and implementing policies and procedures that guide administration and management of the certificate program;
2. Planning and monitoring for the viable financial operation of the certificate program;
3. Designing and implementing the certificate program;
4. Recruiting, monitoring, and evaluating the performance of instructors;
5. Providing oversight to the roles and responsibilities of volunteers, contractors, and associated committees;
6. Communicating information about the certificate program; and

7. Making the decision to issue a certificate.

5.4 Written Job Descriptions: The certificate-awarding entity shall provide all program-related staff with clearly documented job descriptions listing their duties and responsibilities, identifying their supervisors and personnel reporting to them. Written job descriptions shall be reviewed and updated annually **to reflect current responsibilities.**

Fewer and fewer organisations engage in written job descriptions, let alone review and update them annually.

The committee did not agree with this comment.

5.5 Evaluation of Employees: The certificate-awarding entity shall conduct regular performance evaluations and document the results, including plans for continued professional development.

We do not do this and will not do it as it creates disharmony in the office. Suggest it be struck, in favour of the written description.

It is the consensus of the Committee that evaluation of employees is important and the requirement will stand as written.

~~**5.6 Professional Development:** The certificate-awarding entity shall support the ensure that professional development is available to of its personnel and is linked to the stated program competency requirements.~~

It is not clear why this is relevant to having a first-class training program. Seems restrictive and I suggest it be struck from the document.

This requirement was struck as to not prescribe how organizations address professional development needs. This is already referenced in 5.5 Evaluation of Employees.

~~**5.67 Management of Contracted Services:** The certificate-awarding entity shall identify all providers of contracted services related to key program activities. The certificate-awarding entity shall maintain full responsibility for all contracted services. At a minimum, a signed agreement of record must be in place that includes provisions for:~~

1. compliance with certificate program policies and procedures;
2. confidentiality and conflict of interest;
3. monitoring and evaluation of the contractor's work; and
4. protection of intellectual property and ownership of the program.

~~**5.78 Qualifications of Contracted Personnel:** The certificate-awarding entity shall provide evidence that all contracted services are delivered by qualified providers.~~

~~5.9 Commitment to Professionalism and Quality: The certificate-awarding entity must have written processes for continuous quality improvement applicable to all program personnel.~~

It is not clear why a continuous quality improvement process is necessary for training; not all organisations work this way. Perhaps the authors meant 'training must be revised every year' or something similar?

This requirement was struck, as it is covered in 3.8, and cannot be assessed as written in this section.

~~5.9.1 Compliance Requirement: Representatives of the certificate-awarding entity, and any of its staff or contractors, shall agree, in writing, to comply with the requirements of the standard and commit to practicing professionally in delivering a quality program.~~

6. Requirements for Financial Viability

6.1 *Financial Viability:* The certificate-awarding entity must provide evidence of ongoing financial resources, stability, and capability for the operation of the certificate program, including the delivery of the curriculum for all enrolled participants.

I think this is an excellent requirement as most of this document is.

7. Requirements for Certificate Program Application

7.1 *Application Process:* The certificate-awarding entity shall require potential learners to submit a signed application form, which contains:

1. The scope and requirements of the education/training program;
2. A statement that the applicant agrees to comply with the requirements and directions of the education/training program and to supply any information relevant to safety and medical issues;
3. The description of how the applicant meets the required education and work experience criteria, if applicable, including supporting documentation and prerequisites; and,
4. ~~Personal identification Contact information., including, at a minimum, but not limited to, name, address, and contact information~~

Why is this document detailing that contact information must be in the application document? Seems so intuitive that I wonder about the intent of this section or how carefully the document has been edited.

7.1.4 was adjusted to read 'Contact Information,' leaving the details to the organization.

Recommendation to include language in trainee application to include any pre-requisites or other minimum educational, training, or employment-related criteria if applicable.

Recommendation to include language regarding use of industry-accepted, tested, and reliable skill and/or knowledge-based assessment tools if applicable.

This is already covered in the Standard.

8. Requirements for Management System

8.1 Management System: The certificate-awarding entity shall have a documented management system ensuring that the requirements of this Standard are effectively applied and in accordance with established program policies.

8.1.1 Documentation Requirements: A documented management system must include all policies and procedures of the organization that directly impact the development and administration of the certificate program. Minimally, the management system must include the following components: document control, internal audit, and management review.

8.1.2 Document Control Requirements: Document control shall include the tracking, management, and utilization of certificate program documents to ensure system integrity and the fair and consistent application of policies.

8.1.3 Internal Audit Requirements: An internal audit shall be conducted as deemed necessary by the organization and at least annually. The internal audit shall identify any deficiencies, the cause(s) of such deficiencies, corrective and preventive actions and shall be conducted by personnel without any direct or indirect responsibility for the management and administration of the program.

8.1.4 Management Review Requirements: Management shall review the results of the internal audit and sign off on corrective and preventive actions.

8.1.5 Communication of Audit Results: Results of the audit shall be communicated to program personnel and corrective and preventive actions shall be implemented in a timely manner.

Note: A documented management system based on the ISO 9001 would be one method of satisfying this requirement.

9. Requirements for Safety

~~9.1 Commitment to Safety and Safe Practices: The certificate-awarding entity must have and maintain policies and procedures that ensure safety and safe practices in the certificate program and encourage proper and safe industry practices.~~

As for the Safety Requirements this may require specific programs such as Fall Protection (OSHA) and Electrical Safety Program (NFPA 70 E) or Chemical Safety Programs (WHMIS in Canada).

This section needs to be developed in detail with specific guidelines and requirements based on accepted industry standards... ie. OSHA.

~~9.2 Compliance with Jurisdictional Safety Requirements: The certificate-awarding entity shall demonstrate compliance with the required jurisdictional safety requirements and codes (including but not limited to fire codes, ventilation, OSHA). Learning outcomes shall include safe practices in accordance with the scope of the certificate.~~

By who/how does program site safety compliance get demonstrated?

Recommendation to include language indicating that trainees/participants shall have a minimum of industry-recognized safety training included in, or as a pre-requisite to, participation in the certificate program if applicable.

~~9.3 Safety Evaluations: The certificate-awarding entity shall provide a safety evaluation, and applicable corrective action plan at the time of application and at annual reporting.~~

By who/how does site safety compliance get evaluated?

This section was eliminated to address these comments and be less prescriptive. Any requirements pertaining to safety policies and procedures were moved into Section 4.

109. Requirements for Certificate Program—Analysis, Design, Development, Implementation, Assessment and Evaluation

~~109.1 Certificate Development: The certificate-awarding entity shall develop the certificate program in accordance with the requirements of the systematic program plan.~~

Recommendation to include language that indicates that the systematic program plan shall be aligned and compatible with industry-recognized career pathways and demonstrated value-add to the industry at large.

The Committee appreciated this comment, but in the absence of nationally recognized career pathways for our industries this is difficult to address. In addition, the requirement to align curriculum with an industry-accepted JTA should demonstrate industry value.

109.2 Job Task Analysis Basis for Curriculum or Syllabus: The certificate-awarding entity shall offer course(s) or program(s) that are based on a current valid Job Task Analysis that has been developed using generally accepted procedures and supported by documentation.

109.2.1 Syllabi and Curricula: The syllabi and curricula, together with stated prerequisites, if any, shall ensure that participating learners receive instruction and practice that is linked to the knowledge and skill competencies as stated in the Job Task Analysis.

There is no curricula material requirements given. There has to be some type topics, length, etc. defined.

The requirement in the Standard that a formal instructional design model be used to develop the Systematic Program Plan should address one aspect of this comment.

The Committee feels that attaching a number of hours or length requirements for courses or certificate programs to the Standard would be too prescriptive, even impossible, given the range of technologies and types of programs that could fit the requirements of the Standard.

109.2.2 Availability of Job Task Analysis: The Job Task Analysis shall be available upon request as a reference to learners.

Recommendation to include JTA to trainees/participants as an integral component of the training certificate program.

It was the Committee's consensus that this is sufficiently addressed in this requirement of the Standard.

109.3 Systematic Program Plan: The certificate-awarding entity shall ~~have policies addressing the development and maintenance of the~~ a systematic program plan.

109.3.1 Documentation of Systematic Program Plan: The certificate-awarding entity shall document how it has integrated the needs analysis, program design, development, implementation, learner assessment, and evaluation into a systematic program plan.

~~109.3.2~~ *Comprehensive Curricula and Syllabi*: The certificate-awarding entity shall have a defined curriculum and syllabus for each course submitted for accreditation. Instruction shall conform to the curricula and syllabi.

There is no curricula material requirements given. There has to be some type topics, length, etc. defined.

The requirement in the Standard that a formal instructional design model be used to develop the Systematic Program Plan should address one aspect of this comment.

It is the consensus of the Committee that attaching a number of hours or length requirements for courses or certificate programs to the Standard would be too prescriptive, even impossible, given the range of technologies and types of programs that could fit the requirements of the Standard.

~~109.3.3~~ *Curricula and Syllabi Development Revision and Maintenance*: The certificate-awarding entity shall ~~revise and maintain as needed have established policies guiding the development and revision of a comprehensive~~ the curricula and syllabi, including applicable prerequisites (skills and knowledge) needed for learners to achieve learning objectives.

The curriculum and content be unbiased, or unbranded. No single manufacturers goods to be taught but reference to a sample.

This has been addressed in Section 4.1.6.

~~109.3.4~~ *Utilizing Another Entity's Third-Party Curricula*: Certificate-awarding entities utilizing a curriculum developed by a ~~another entity third-party~~ must demonstrate that the curriculum meets the requirements of the systematic program plan.

~~109.4~~ *Program Requirements for Certificate Issuance*: The certificate-awarding entity shall establish and publish requirements for issuing a certificate. Such requirements shall be aligned with the program's curricula.

~~109.4.1~~ *Minimum Guidelines for Issuance*: Requirements for issuing a certificate shall include minimum guidelines for participation and achievement on assessments of learning outcomes.

In order for this new IREC/ANSI accreditation to be accepted in the market place as an indication of completion of a rigorous training certificate program and go above and beyond the current ISPQ standard for an individual course or courses, ___ feels there is a need to define a minimum number of contact hours for training duration of a certificate program. The definition of contact

training hours should also be clearly defined (lecture vs. assessment etc). See ACCET Example: www.accet.org/downloads/docs/doc15.pdf Without a minimum number of contact hours, a training provider can offer very short and surface level training even if the JTA is touched on point by point and even with an assessment at the end. The term certificate program needs to be reserved for rigorous and complete training that CAN NOT be accomplished in a few days or only a week long training. The industry is flooded with NABCEP "test prep" / "boot camp" training that does not emphasize adequate time and exposure to concepts and learning content. _____ proposes at least 120 contact hours (about 3 typical college full semester courses or 3 full weeks of in-person training) for this accreditation and the right to call a program a certificate program. Any other training program that is a few days or One or Two week courses long can apply for the individual ISPQ Accreditation for individual courses.

I think it's in IREC's and the industry's best interest to establish a minimum number of contact hours for a certificate program. Otherwise, we'll start to see this certificate program get diluted by mediocre training institutions that are trying to sell a one or two week class as a "certificate programs". I think a minimum should be 120 hours. This accreditation should be reserved for training organizations and educational institutions that can offer a full program vs. a few courses. I want IREC to set this standard, not training organizations.

It is the consensus of the Committee that attaching a number of hours or length requirements for courses or certificate programs to the Standard would be too prescriptive, even impossible, given the range of technologies and types of programs that could fit the requirements of the Standard.

~~109.5 Certificate Term: If the certificate-awarding entity has an expiration date, the term shall be referenced in information to learners and stakeholders. shall determine a certificate's validity based on the program's scope and the currency and relevance of content. Validity shall be referenced in program policies and information to learners and stakeholders.~~

Recommendation to include language on whether or not the certificate expires and if applicable, requirements for renewal or maintenance of certificate.

This is addressed in the current language of the Standard.

~~109.6 Facilities Requirements:~~ The certificate-awarding entity shall have or have access to facilities in which to conduct education/training.

~~109.6.1~~ *Support of the Learner*: Education/training facilities must support the learners' participation in the program and attainment of learning objectives. ~~in accordance with the safety requirements of the Standard.~~

~~109.6.2~~ *Safety Requirements*: Facilities must provide a safe learning environment that supports the delivery of the course, interaction of learners and instructors, and instructional technology, **including proper safety materials and equipment.**

~~109.6.3~~ *Off-site Facility Requirements*: Certificate-awarding entities conducting education/training off site or in facilities not owned shall assure and attest such facilities comply with the requirements of the Standard.

Recommendation to include language which specifies that training facilities are not only accessible but are conducive to learning, supportive of the learning process and provide the trainee/participant with access to necessary tools inclusive of, but not limited to, hand tools, text books, Internet and/or online resources, PPE, safety materials, technical equipment such as props and other tools, etc. in order to facilitate a holistic and comprehensive learning environment supporting achievement of the certificate by the participant.

It is the consensus of the Committee that facilities, tools, equipment, hardware, resources and safety requirements are adequately addressed within the Standard.

~~109.7~~ *Tools, Equipment, and Hardware Requirements*: The certificate-awarding entity shall assure the necessary tools, equipment, and hardware are available for learners to achieve learning outcomes. This includes but is not limited to personal protective equipment, safety materials and equipment, education/training hardware, and tools.

~~109.8~~ *Resource Requirements*: The certificate-awarding entity shall provide access to library, research materials, and applicable job placement resources for the learners' reference and use. Services **may be provided through various media and providing these resources** may be subcontracted.

Recommendation to include language regarding access to Internet and computers as appropriate resources to support learning and job search/placement; access through referrals to community-based resources for remedial training if necessary or applicable.

I think that it should be stated that an online library is acceptable.

Wording of the requirement was edited to make it clearer that different formats are acceptable.

109.9 Delivery of Certificate Program: The certificate-awarding entity shall deliver course(s) that meet the following requirements:

1. The instruction is presented in an organized and sequential learning format;
2. Courses shall include use of effective adult learning principles and practices;
3. Assignments and practice exercises are clear and have defined and measurable learning goals (e.g. rubrics, checklists);
4. The instructor provides timely and specific feedback to learners regarding their progress toward attainment of learning objectives;
5. Specific practice exercises related to the learning objectives should be offered. Practice exercises may take the form of group projects, case studies, scenarios, lab activity, practical experiences, and other forms of learner-centered instructional practice;
6. Learner assessments that evaluate achievement of the learning objectives are conducted.
- ~~7. Learners evaluate program content, instructor effectiveness, quality of the technical experience, and support/assistance that is provided; and~~
- ~~8. The program is evaluated on a regular basis for the quality of technical design, instructional materials, links, and the specific delivery applications.~~

Most importantly, please consider adding a specific minimum CONTACT HOUR educational requirement. Requiring 120 hours seems like a minimum for any certificate-awarding entity. Participation solely in shorter evening/weekend type programs should NOT qualify.

I am not sure if this is the correct section, but I would like to recommend that you require a minimal amount of training hours under the certificate program. I don't think 40 contact hours would be enough to really provide a 'certificate', but more like 120-130 contact hours (online and in person) at least! I feel that this should be clearly stated.

Class size or student to instructor to student ratio should be addressed. In order to adequately offer an environment that fosters questions and instructor interaction in both lab and classroom environments we feel a 25:1 ratio is the maximum student to instructor ratio. Requiring this will speak to the topic of adequate instructor support.

As stated above, it is the consensus of the Committee that attaching a number of hours or length requirements for courses or certificate programs to the Standard would be too prescriptive, even impossible, given the range of technologies and types of programs that could fit the requirements of the Standard.

In addition, the Glossary definition was edited to more clearly state that a certificate program can be a course or sequence of courses or learning events.

~~109.10 Online Delivery:~~ In instances in which learning is delivered online, requirements for the delivery of the certificate program as outlined in this standard must be met in addition to the following conditions: ~~the following additional requirements and conditions must be met:~~

1. Each course or learning event must have an identified instructor.
2. The provider must indicate in advance of the program the hardware and software that are required for the learner to participate;
3. Navigation must be clearly described orally or in writing. If difficulties are encountered during navigation, instructions are given on how to get assistance;
4. There must be a system in place capable of monitoring and tracking the learning process, learner assessments, and learner records;
- ~~5. Paid advertising is prohibited within the educational content including, but not limited to, banner ads, subliminal ads, pop-up window ads, or links to promotion of products and or services. Sponsorship acknowledgement is allowed; (moved to policies)~~
6. Learners must have a mechanism to contact the provider with technical and content related questions. Response time related to training questions must be stated in the syllabus and adhered to; and
7. Contingency strategies must be in place to provide a quick recovery from technology-related interruptions in order to complete the training in a timely manner.

Recommendation to include assistance by training provider for online learning support.

Not only should there be a 'contact person' for online students, but this person should be a knowledgeable instructor of the course content. Without clarifying this, the 'contact person' could just be a technical assistance person that helps the student log in and navigate the online course, and may not necessarily be qualified to answer questions regarding course content in a satisfactory way.

** Clearly require that there needs to be an INSTRUCTOR (with proper credentials) assigned to any online course and not just a point of contact. There is a growing amount of low quality online and computer based training without adequate instructional support from qualified instructors. Online learning should have the same level of quality instructional support as in-person training. * Pacing guides need to be clearly defined in self paced courses * If there is a requirement for synchronous (live) activities or group meetings in an online course that needs to be clearly stated * In order to adequately offer an environment that fosters questions and instructor interaction in online classroom environments we feel a 25:1 ratio is the maximum student to instructor ratio. Requiring this will speak to the topic of adequate instructor support.*

I am in full support of having the exact same instructional standards in place for online as for in-person. The current language is weak and could benefit from enhancing the requirements for an instructor. Students need to have more than just a mechanism to contact the provider with

questions. There needs to be an actual qualified instructor who is answering questions and who is engaged in the class.

Quality Standards for online delivery programs should be comparable to face-to-face programs. Online programs WITHOUT instructor-based online delivery, supervision, evaluation, and assessment should NOT be eligible for credit.

It was the consensus of the Committee that some of the comments regarding online delivery were more prescriptive than the intent of the Standard. However, the language was strengthened to make it clearer that online programs must meet ALL the requirements of the Standard, INCLUDING those in this section. Also, it was made clear that the student must be able to contact the provider with technical or content related questions. An item requiring that each online course have an identified instructor was added.

109.11 Assessment of Learners: The certificate-awarding entity shall, at the conclusion of each course, evaluate learner attainment of learning outcomes by use of a ~~written or alternative criterion-referenced assessment examination~~. All ~~Written~~ examinations shall meet the requirements as set forth in this Standard. Assessment of learners may ~~also~~ include ~~written examinations, other mechanisms such as~~ practical examinations, exercises, and group projects.; ~~and attendance requirements.~~

___ feels that this area needs to be clarified as it seems pretty clear at first that a written exam is required, but then it is stated that attendance can be used to satisfy this assessment requirement. ___ recommends requiring written examinations through quizzes or tests for lecture based classroom courses and attendance can be used ONLY for laboratory based learning opportunities.

Sections pertaining to assessments were rewritten to more clearly distinguish between requirements for written versus non-written assessments

109.11.1 Information to Learners: The criteria by which learners will be evaluated for a given education/training course or program shall be made known to the learners at the outset of the course or program.

Recommendation to provide information to trainee in writing.

109.12 Written Examinations: Assessment of individual learners must include a summative written examination. Written ~~e~~Examinations must be criterion-referenced and based on stated

learning objectives. All examinations must be developed in conformity with accepted assessment practices.

Again this area seems pretty clear, but attendance is cited in 10.11 as a acceptable form of assessment: Assessment of learners may also include other mechanisms such as practical exams, exercises, group projects, and attendance requirements. ___ recommends requiring written examinations for lecture based classroom courses and attendance can be used ONLY for laboratory based or hands-on learning opportunities.

Reference to attendance requirements was removed because attendance cannot be criterion referenced. The language in the requirement was expanded to indicate that all forms of assessment must be criterion referenced and meet the other requirements of the Standard for examinations. A requirement calling for a summative written examination was added.

The certificate-awarding entity must have written policies and procedures for examination development, maintenance, and administration that ensure the following:

109.12.1 Examination Development and Maintenance

1. Examinations shall assess learners' achievement of the stated learning objectives.
2. Examination questions follow accepted guidelines for specific question types (multiple choice, performance, etc.)
3. Examinations are developed in a secure manner (security of examination materials, non-disclosure agreements, restricted access of examination materials to authorized personnel, etc.).
4. Examinations are pilot-tested before they are scored.
5. Examinations ~~Assessment instruments~~ are evaluated/reviewed for quality, relevance, and accuracy of measurement ~~and effectiveness~~ on a regular basis.

Recommendation to provide provisions for accessibility for examinations including, but not limited to, materials provided in other languages where demographics demonstrate need such as with communities where there is limited English proficiency.

It was the consensus of the Committee that the current requirements for reasonable accommodations are sufficient and should not be expanded on to explicitly include language considerations.

109.12.2 Examination Administration

1. Examinations, including online, are administered in a secure and standardized manner.

2. Examination administration must be aligned with the type of examination (written, oral, or performance).
3. Reasonable accommodations are provided for learners with special needs.
4. Examination administrators shall follow examination administration protocols.

Recommendation to provide provisions for accessibility for examinations including, but not limited to, materials provided in other languages where demographics demonstrate need such as with communities where there is limited English proficiency.

It was the consensus of the Committee that the current requirements for reasonable accommodations are sufficient and should not be expanded on to explicitly include language considerations.

109.12.3 Scoring of Examinations

1. The passing score shall be determined by a methodology that is criterion-referenced.
2. Learners shall receive a score report that indicates their performance against the stated learning objectives.
3. A scoring rubric shall be used for all performance examinations.
4. Evidence must be provided to ensure the scoring of the exam is consistent across raters (i.e. inter-rater reliability).

Recommendation to include language on non-biased scoring including, but not limited to, blind scoring, etc.

It was the consensus of the Committee that current requirements for scoring of examinations sufficiently address these comments.

109.13 Other Types of Assessments (Oral, Performance, Tangible Products [add to glossary])
Other Than Written: All assessments must be criterion-referenced and based on stated learning objectives. All assessments must be developed in conformity with accepted practices.

The certificate-awarding entity must have written policies and procedures for development, maintenance, and administration of all types of assessments that ensure the following:

109.132.1 Development and Maintenance of Other Types of Assessments

1. All assessments shall measure learners' achievement of the stated learning objectives.
2. Measurement instruments for other types of assessments must follow accepted guidelines for development (e.g., criterion-referenced checklists, rubrics, observation instruments).

3. All assessments are developed in a secure manner (security of assessment materials, non-disclosure agreements, restricted access of assessment materials to authorized personnel, etc.).
4. Measurement instruments are pilot-tested before they are scored.
5. Assessments are ~~and~~ evaluated/reviewed for quality, relevance, and accuracy of measurement ~~and effectiveness~~ on a regular basis.

~~109.132.2~~ Administration of Other Types of Assessments

1. All assessments are administered in a secure and standardized manner.
2. When a physical performance is assessed, all space and equipment needs are specified and standardized; these requirements are met before any assessment is conducted.
3. Oral examinations are conducted individually and privately.
4. Administration of all types of assessments must be aligned with the type of examination (oral, performance, or tangible product).
5. Reasonable accommodations are provided for learners with special needs.
6. Examination administrators shall follow examination administration protocols in accordance with the type of assessment.

~~109.132.3~~ Scoring of Other Types of Assessments

1. The passing score shall be determined by a methodology that is criterion-referenced.
2. A scoring rubric, checklist, or observation instrument shall be used in accordance with the type of assessment.
3. Individual items in checklists and other observation instruments shall have specific criteria for observation (yes/no, pass/fail, behaviorally anchored rating categories).
4. Checklists and other observation instruments shall have included on the instrument specific stated criteria for mastery of the task, skill, or knowledge that the instrument is measuring.
5. Learners shall receive a score report that indicates their performance against the stated learning objectives.
6. Processes must be in place to ensure consistency in scoring ~~Evidence must be provided to ensure the scoring of all types of assessments are consistent across raters~~ (i.e., inter-rater reliability).
7. Learners shall receive their scores in accordance with published timelines.

~~109.134~~ *Awarding Credits*: If academic or continuing education credit is offered for the certificate program, there shall be a consistent and documented method by which such credits are awarded.

~~109.134.1~~ *Use of Another Entity's ~~a Third-Party Scheme Credit-Awarding System~~*: If another entity's ~~third-party's~~ credit-awarding system is used, the method must conform to that organization's requirements. If credit is awarded by another entity ~~third party~~, it must be documented. Information about the amount and type of credits awarded and the requirements for earning credits shall be communicated to all stakeholders.

~~109.145~~ *Evaluation of Program Effectiveness*: The certificate-awarding entity must conduct an evaluation of program effectiveness.

~~109.145.1~~ *Comprehensive Program Evaluations*: The certificate-awarding entity shall develop, implement, and maintain an evaluation process that allows learners, contractors, and other program participants to provide feedback on all aspects of the program (course design, delivery, quality of instruction, assessment instruments, graduate job placement, facilities, equipment, administration processes, etc.).

~~109.145.2~~ *Results of Performance Data*: The comprehensive evaluation shall include results of performance data related to the learners' attainment of learning outcomes, and these data shall be used to make modifications or revisions to the course and/or program.

~~109.145.3~~ *Record of Evaluations*: The results of evaluations shall become part of the official record of the program. The comprehensive evaluations shall be part of the entity's continuous quality improvement process.

~~110.~~ Requirements for Information about the Certificate Program

~~110.1~~ *Information about the Certificate Program*: The certificate-awarding entity shall publish and make available relevant program information.

~~110.2~~ *Communicating Use of Certificate*: The certificate-awarding entity shall communicate to certificate holders and other stakeholders authorized use of the certificate and its designation, if applicable. (see 4.1.7)

~~110.3~~ *Informational Materials*: The certificate-awarding entity shall publish and define the purposes and uses of the certificate in the marketplace, shall not state or suggest that certificate holders are certified, licensed, registered, or accredited, or suggest that successful completion of the certificate program will guarantee a job for the certificate holder.

Materials should be unbiased or brand neutral.

This has been addressed in the Standard.

110.4 Information Provided to Learners and Stakeholders: At a minimum, the certificate-awarding entity shall provide applicants, learners, and stakeholders with an accurate, current, detailed description of the following:

1. The scope of the certificate program, including the current Job Task Analysis;
2. Curricular content, including learning objectives and assessment methodologies;
3. A description of prerequisites and program requisites, including fees, additional charges for instructional materials, tools, and protective equipment;
4. The skill sets that certificate holders would expect to gain and examples of the types of jobs for which they might apply upon successful completion of the program.
5. Relevant program policies (deadlines, cancellation and refund policies, appeals and due process);
6. The terms of awarding academic or continuing education credits; and
7. Changes to the program and effective dates.

Recommendation to include language regarding renewal of certificate; costs of program including renewal, and parameters and timeline of renewal process or certificate expiration if applicable.

All of these items are already addressed in this requirement of the Standard. Renewal is not typically used in reference to certificate programs so will not be addressed.